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U.S. Nuclear Regulatory Commission
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Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT FOR 2008

Attention: John Hickman

In accordance with 10 CFR 50.36(a)(2) and Rancho Seco Quality Manual, Appendix A, Section 1.5.3, we are submitting the Rancho Seco 2008 Annual Radioactive Effluent Release Report for the period of January 1, 2008 through December 31, 2008. We are also submitting versions of the Offsite Dose Calculation Manual (i.e., CAP-0002, Revisions 21 and 22) that were revised since the last submittal.

If you or members of your staff have questions requiring additional information or clarification, please contact me at (916) 732-4817.

Sincerely,

Einar Ronningen
Superintendent, Rancho Seco Assets

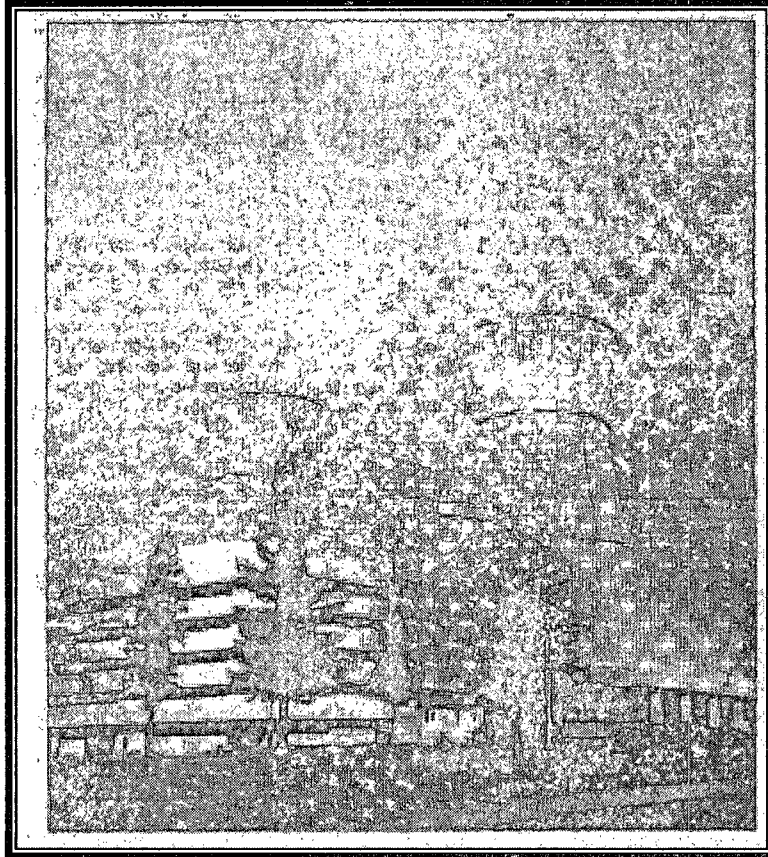
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**RANCHO SECO
NUCLEAR GENERATING STATION**

LICENSE NUMBERS DPR-54 and SNM-2510



ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

JANUARY – DECEMBER 2008

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INTRODUCTION

Rancho Seco Nuclear Generating Station (RSNGS) Unit No. 1 is located in Sacramento County, California approximately 25 miles southeast of Sacramento and 26 miles north-northeast of Stockton. Rancho Seco Unit No. 1 began commercial operation on April 17, 1975. The single unit on the Rancho Seco site was a pressurized water reactor supplied by Babcock and Wilcox. The rated capacity was 963 gross megawatts electrical. Because of a public vote on June 6, 1989, Sacramento Municipal Utility District (the District) shutdown the Rancho Seco Nuclear Generating Station and completed defueling operations on December 8, 1989. Transfer of the spent fuel rod assemblies from the Spent Fuel Pool into dry storage at the Interim Spent Fuel Storage Installation (ISFSI) was completed on August 21, 2002. The Retention Basins, which were used to collect, mix, and analyze radioactive liquid waste prior to release to combined effluent, were removed in August 2007. No liquid radioactive waste was discharged in 2008. The Reactor Building Stack Exhaust Fan (A536) was permanently removed from service in June 2008. A temporary Reactor Building Exhaust fan was installed in the main steam line penetration of the Reactor Building in July 2008 and was operated and monitored when dismantlement activities occurred in the Reactor Building. The radiological dismantlement project was completed in December 2008.

This Annual Radioactive Effluent Release Report (ARERR) provides a summary of gaseous and liquid effluent releases made from Rancho Seco during the period of January 1 through December 31, 2008. Also presented in this report is the projected radiological impact from these releases and a summary of solid radioactive waste shipments.

This report has been prepared by the District to meet the requirements of Rancho Seco Quality Manual (RSQM), Appendix A, Section 1.5.3 and Offsite Dose Calculation Manual (ODCM) Revision 22, Step 6.12. It is presented in accordance with the format of USNRC Regulatory Guide 1.21. The radiation doses reported in this ARERR are calculated for a hypothetical individual who receives the maximum possible exposure at or beyond the applicable Site Boundary.

Releases of radioactivity in gaseous and liquid effluents during this report period did not exceed the limits of 10 CFR 20 or the numerical guidelines of 10 CFR 50, Appendix I. A 40 CFR 190 dose evaluation is not required because radioactive effluent releases did not exceed twice the numerical guidelines of 10 CFR 50, Appendix I.

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I. SUPPLEMENTAL INFORMATION

A. REGULATORY LIMITS & GUIDELINES FOR EFFLUENT RELEASES

1. Gaseous Effluents

- a. Dose rate limit at or beyond the Site Boundary for Gaseous Effluents for Tritium and radioactive material in particulate form with half-lives greater than 8 days (ODCM, Technical Requirement 6.11.5):

1500 mrem/year to any organ

- b. Dose commitment to a member of the public at or beyond the Site Boundary for Gaseous Effluents from Tritium and radioactive material in particulate form with half-lives greater than 8 days (ODCM Technical Requirement 6.11.6, numerical guidelines of 10 CFR 50, Appendix I):

7.5 mrem per calendar quarter to any organ

15 mrem per calendar year to any organ

2. Liquid Effluents

- a. The concentration of radioactive material in liquid effluents released beyond the Site Boundary for Liquid Effluents shall not exceed the limits of 10 CFR 20, Appendix B, Table 2, Column 2. This applies to all radionuclides except dissolved or entrained noble gases (ODCM Technical Requirement 6.11.1).

- b. Dose commitment to a member of the public at or beyond the Site Boundary for Liquid Effluents from radioactive materials in liquid effluents shall be limited to (ODCM Technical Requirement 6.11.2, numerical guidelines of 10 CFR 50, Appendix I):

1.5 mrem per calendar quarter to the total body

5 mrem per calendar quarter to any organ

3 mrem per calendar year to the total body

10 mrem per calendar year to any organ

NOTE: The noble gas source term was removed when spent fuel transfer to the ISFSI was completed in August 2002. Reference to noble gases was completely removed from the ODCM.

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B. MAXIMUM EFFLUENT CONCENTRATIONS

1. Gaseous Effluents

The concentrations listed in 10 CFR 20, Appendix B, Table 2, Column 1 (air) are not directly used in calculations for determining permissible gaseous effluent release rates. The annual dose limits of 10 CFR 20 for unrestricted areas are the doses associated with the concentrations of 10 CFR 20, Appendix B, Table 2, Column 1. ODCM Technical Requirement dose rate limits (mrem/yr) for gaseous effluents are provided to ensure that the dose rate from gaseous effluents at any time at the Site Boundary for Gaseous Effluents will be within the annual dose limits of 10 CFR 20 for unrestricted areas. These dose rate limits (listed above in part A) are used for determining permissible gaseous effluent release rates.

2. Liquid Effluents

The concentration values listed in 10 CFR 20, Appendix B, Table 2, Column 2 are used in calculations to determine permissible liquid discharge flow rates. The most conservative Maximum Effluent Concentration (MEC) value for each radionuclide detected in the liquid effluent sample (excluding dissolved or entrained noble gases) is used in the calculations.

C. MEASUREMENT METHODS FOR TOTAL RADIOACTIVITY

1. Gaseous Effluents

Liquid Scintillation (H-3)

Gamma Spectroscopy (HPGe)

Beta Proportional (Sr-90, gross beta)

Alpha Proportional (gross alpha)

2. Liquid Effluents

Gamma Spectroscopy (HPGe)

Liquid Scintillation (H-3)

Beta Proportional (Sr-90, gross beta)

Alpha Proportional (gross alpha)

NOTE: HPGe refers to Hyper-Pure Germanium

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D. BATCH RELEASES (via monitored pathways)

1. Liquid (Retention Basin Discharges)	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
a. Number of batch releases	0	0	0	0
b. Total time period for batch releases (hours)	N/A	N/A	N/A	N/A
c. Maximum time period for a batch release (hours)	N/A	N/A	N/A	N/A
d. Average time period for a batch release (hours)	N/A	N/A	N/A	N/A
e. Minimum time period for a batch release (hours)	N/A	N/A	N/A	N/A
f. Average Plant Effluent Flow (cfs)	18.9	18.6	16.8	20.1

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E. UNPLANNED RELEASES

This section describes unplanned releases of radioactivity in liquid and gaseous effluent.

Gaseous

None

Liquid

None

F. RADIOACTIVE EFFLUENT MONITORING INSTRUMENTATION INOPERABLE FOR GREATER THAN 30 DAYS

None

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II. ESTIMATION OF ERROR

The methods for establishing error estimates included review of applicable station procedures, inspection of sampling equipment, engineering estimates, statistical applications, review of calibration setpoint data, and communication with plant personnel. The various sources of error (s) in reported values of gaseous effluents, liquid effluents, and solid waste are assumed to be independent, and thus the total error is calculated according to the formula:

$$\text{Total Error} = \sqrt{\sigma_1^2 + \sigma_2^2 + \sigma_3^2 K + \sigma_i^2}$$

where: σ_i = relative error associated with component i

Sources of error for gaseous effluents include fan error (flow), grab sampling, collection, filter efficiency, counting, and calibration.

Sources of error for liquid effluents include retention basin volume, dilution water flow rate, grab sampling, counting, and calibration.

Sources of error for solid waste include offsite lab smear analysis, dose rate meter calibration, dose rate meter reading, computer program dose-to-curie calculation, sample volume measurement, gamma spec counting, gamma spec calibration, and waste volume determination.

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III. GASEOUS EFFLUENTS

Table III-A, Gaseous Effluents - Summation of All Releases, provides a detailed summary of gaseous effluent releases per quarter. This table summarizes releases of tritium and particulates with half-lives greater than 8 days. The methodology used to calculate the Percent of ODCM Technical Requirement limit is as follows:

$$\% \text{ Tech Req Limit} = \frac{\sum_i [(F_i)(\text{Avg Rel Rate})(X/Q)(\text{Dose Factor})]}{(\text{Dose Rate Limit})} \times 100\%$$

where:

F_i = The fraction of the total number of Curies of nuclide i out of the total curies in that category for that quarter (unitless).

NOTE: F_i always equals 1.0 for H-3 because it is the only nuclide in the category.

$$\text{Avg Rel Rate} = \frac{(\text{Total Curies per category per quarter}) \left(\frac{1 \text{ E} + 06 \mu\text{Ci}}{\text{Ci}} \right)}{(\# \text{ seconds in the quarter})}$$

X/Q = A default dispersion factor determined to be conservative when compared to the use of actual data (sec/m³).

Dose Factor = The values derived for each nuclide i from NRC Regulatory Guide 1.109 (K_i , $L_i + 1.1M_i$, or R_{aij}). [Units in (mrem/yr)/($\mu\text{Ci}/\text{m}^3$)]

Dose Rate Limit = The Technical Requirement (i.e., Regulatory) limits for dose rate listed in Section I of this report (mrem/yr).

NOTE: Particulates with half-lives less than 8 days are not included in this calculation.

The methodology used to calculate the Estimated Total Error (%) in Table III-A is presented in Section II of this report.

Table III-B, Gaseous Effluents - Ground Level Releases, provides a complete quarterly summary of the amount of radioactivity (Ci) released per radionuclide in each quarter. Data from continuous and batch releases are provided for particulates and tritium. Data reported for batch releases results only from unplanned releases.

Table III-C, Gaseous Effluents - Typical Lower Limits of Detection, provides a listing of the typical lower limit of detection (LLD) concentrations in $\mu\text{Ci}/\text{cc}$ for various radionuclides.

Table III-D, Radiological Impact on Man Due to Gaseous Effluent Releases, provides a summary of calculated radiation doses delivered to a maximum exposed hypothetical individual at the Site Boundary for Gaseous Effluents (actual doses will be assessed in the 2008 Annual REMP Report). The maximum calculated organ dose is listed for each quarter along with an annual total. The direct radiation dose results, based on monitoring badge dosimetry, are also listed. Presented in this table for each category is a comparison versus ODCM Technical Requirement dose limits with the exception of direct radiation measurements.

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TABLE III-A

GASEOUS EFFLUENTS - SUMMATION OF ALL RELEASES

	<u>Unit</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>	<u>Est. Total Error, %</u>
G. Particulates						
1. Particulates with half-lives>8 days	Ci	0.00E+00	1.03E-05	7.21E-06	0.00E+00	2.3E+01
2. Average Release Rate for period	μCi/sec	0.00E+00	1.31E-06	9.07E-07	0.00E+00	
3. Percent of Tech Req limit	%	N/A	7.93E-06	5.48E-06	N/A	
4. Gross Alpha radioactivity ^a	Ci	1.40E-07	6.77E-09	1.29E-08	6.55E-08	
H. Tritium						
1. Total Release	Ci	5.30E-01	5.43E-02	0.00E+00	0.00E+00	2.3E+01
2. Average Release Rate for period	μCi/sec	6.74E-02	6.91E-03	0.00E+00	0.00E+00	
3. Percent of Tech Req limit	%	5.71E-04	5.85E-05	N/A	N/A	

^a The gross alpha activity for 2008 includes monitoring data from the Reactor Building Stack, temporary Reactor Building Exhaust fan, and the Interim Onsite Storage Building Stack.

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TABLE III-B

GASEOUS EFFLUENTS - GROUND LEVEL RELEASES

Nuclides Released	Unit	Continuous Mode			
		Quarter 1	Quarter 2	Quarter 3	Quarter 4
1. Particulates ^a					
Cs-137	Ci	0.00E+00	1.03E-05	7.21E-06	0.00E+00
2. Tritium					
H-3	Ci	5.30E-01	5.43E-02	0.00E+00	0.00E+00

^a Trace amounts of Am-241, Cm-242, and Pu-238 were identified present in particulate samples by Alpha Spectroscopy measurement. Their concentrations were at or slightly above MDA values and did not have a significant contribution to dose from gaseous releases.

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TABLE III-C

GASEOUS EFFLUENTS - TYPICAL LOWER LIMITS OF DETECTION

<u>RADIONUCLIDES</u>	<u>LLD ($\mu\text{Ci/cc}$)</u>
1. Tritium (H-3)	2.27 E-10
2. Particulates:	
Manganese-54	2.08 E-12
Cobalt-58	2.29 E-12
Iron-59	5.89 E-12
Cobalt-60	3.11 E-12
Strontium-89	2.00 E-15
Strontium-90	5.00 E-15
Cesium-134	1.52 E-12
Cesium-137	1.88 E-12
Barium-140	3.06 E-12
Cerium-141	1.15 E-12
Cerium-144	3.69 E-12

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TABLE III-D

RADIOLOGICAL IMPACT ON MAN DUE TO GASEOUS EFFLUENT RELEASES

CALCULATED RADIATION DOSES AT THE SITE BOUNDARY FOR GASEOUS EFFLUENTS:

	<u>Unit</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>	<u>2008 Annual</u>
A. Tritium, Particulate						
1. Maximum Organ Dose	mrem	1.72 E-02 (a)	6.44 E-02 (b)	4.41 E-02 (b)	0.00 E+00	1.22 E-01 (b)
Percent Tech Req limit	%	2.29 E-01	8.59 E-01	5.88 E-01	0.00 E+00	8.13 E-01
B. Direct Radiation						
1. Dose (Monitoring Badges)	mrem	0.00 E+00*	0.00 E+00*	0.00 E+00*	0.00 E+00*	0.00 E+00*
2. Percent of Tech Req limit	%	N/A	N/A	N/A	N/A	N/A

NOTE: The quarterly doses listed above were calculated using dose factors from GASPAR and default meteorological data for each quarter. Annual doses are the sum of quarterly doses.

(a) Child – All Except Bone
(b) Infant - Liver

* None of the Indicator stations indicate significant radiation attributable to Plant operations.

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IV. LIQUID EFFLUENTS

Table IV-A, Liquid Effluents - Summation of All Releases, provides a detailed summary of liquid effluent releases per quarter. This table summarizes releases of fission and activation products, tritium, dissolved and entrained gases, and gross alpha radioactivity. Also listed is the volume of waste released prior to dilution and the volume of dilution water used during each quarter.

The following methodology is used to calculate the Average Diluted Concentration and the Percent of ODCM Technical Requirement Limit in Table IV-A:

$$\% \text{ Tech Req Limit} = \sum_i^n \left[\frac{C_i}{\text{MEC}_i} \right]$$

where: n = The total number of radionuclides identified
C_i = The average diluted concentration of radionuclide i
= $\frac{(\text{Total Release per Category per Quarter in } \mu\text{Ci})}{(\text{Total Release Volume (part F in Table IV - A) in ml)}$

MEC_i = The MEC of the ith radionuclide, from 10 CFR 20, Appendix B, Table 2, Column 2

The methodology used to calculate the estimated total error in Table IV-A is presented in Section II of this report.

Table IV-B, Liquid Effluents, provides a complete quarterly summary of the amount of radioactivity (Ci) released per radionuclide in each quarter. Data is provided for fission and activation products, and for dissolved and entrained gases. Tritium and gross alpha are not included in this table (they are listed in Table IV-A). Since no continuous releases of liquid radioactive effluent are made from RSNGS, data is provided only for batch releases.

Table IV-C, Liquid Effluents - Typical Lower Limits of Detection, provides a listing of the typical lower limit of detection (LLD) concentrations in $\mu\text{Ci/ml}$ for various radionuclides.

Table IV-D, Radiological Impact on Man Due To Liquid Effluent Releases, provides a summary of calculated radiation doses delivered to a maximum exposed hypothetical individual at the Site Boundary for Liquid Effluents (actual doses will be assessed in the 2008 Annual REMP Report). The maximum calculated total body dose and organ dose are listed for each quarter along with an annual total. A comparison versus ODCM Technical Requirement dose limits is also presented.

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TABLE IV-A

LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES

	<u>Unit</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>	<u>Est. Total Error, %</u>
A. Fission & Activation Products						
1. Total Release (not including tritium, gases, alpha)	Ci	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	N/A
2. Average diluted concentration during period	µCi/ml	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	
3. Percent of Tech Req limit	%	N/A	N/A	N/A	N/A	
B. Tritium						
1. Total Release	Ci	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	N/A
2. Average diluted concentration during period	µCi/ml	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	
3. Percent of Tech Req limit	%	N/A	N/A	N/A	N/A	
C. Dissolved and Entrained Gases (i.e., Noble Gases)						
1. Total Release	Ci	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	N/A
2. Average diluted concentration during period	µCi/ml	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	
D. Gross Alpha radioactivity						
1. Total Release	Ci	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	N/A
E. Volume of Waste Released						
Retention Basins (prior to dilution)	Liters	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	N/A
F. Volume of dilution water used during period						
	Liters	N/A	N/A	N/A	N/A	N/A

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TABLE IV-B
LIQUID EFFLUENTS

<u>Nuclides Released</u>	<u>Batch Mode</u>
1. <u>Fission and activation products</u> <u>(excluding tritium, gases alpha)</u>	
None	
2. <u>Dissolved and entrained gases</u>	
None	

NOTE: No releases of liquid radioactive effluent were made from Rancho Seco Nuclear Generating Station in 2008.

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TABLE IV-C

LIQUID EFFLUENTS - TYPICAL LOWER LIMITS OF DETECTION

<u>RADIONUCLIDES</u>	<u>BATCH MODE: LLD ($\mu\text{Ci/ml}$)</u>
1. Tritium (H-3)	2.60 E-06
2. Particulates:	
Manganese-54	2.11 E-09
Iron-59	3.71 E-09
Cobalt-57	2.12 E-09
Cobalt-58	1.93 E-09
Cobalt-60	1.98 E-09
Zinc-65	4.34 E-09
Strontium-90	5.00 E-10
Ruthenium-106	1.79 E-08
Silver-110m	1.94 E-09
Antimony-125	5.78 E-09
Cesium-134	1.93 E-09
Cesium-136	2.23 E-09
Cesium-137	2.30 E-09
Barium-140	7.75 E-09
Cerium-141	3.60 E-09
Cerium-144	1.59 E-08
3. Dissolved and Entrained Gases:	
Krypton-85	4.87 E-07

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TABLE IV-D

RADIOLOGICAL IMPACT ON MAN DUE TO LIQUID EFFLUENT RELEASES

CALCULATED RADIATION DOSE COMMITMENTS FOR LIQUID EFFLUENTS:

	<u>Unit</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>	<u>2008 Annual</u>
A. Maximum Total Body Dose	mrem	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00
Percent Tech Req limit	%	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00
B. Maximum Organ Dose	mrem	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00
Percent Tech Req limit	%	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00	0.00 E+00

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V. SOLID WASTE

I. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (Not irradiated fuel)

1. Type of Waste:

	Volume (m ³)	Total Activity (Curies)	Est. Total Error (%)
A. Spent Resins, filter sludges, evaporator bottoms, etc.	1.44 E+01	4.67 E+00	2.5 E+01
B. Dry compressible waste, contaminated equipment, etc	3.44 E+03	1.15 E+01	2.5 E+01
C. Irradiated components, control rods, etc.	7.18 E+00	1.24 E+01	2.5 E+01
D. Other (primary metals, valves, piping)	2.94 E+01	1.61 E+00	2.5 E+01

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2. Estimate of major nuclide composition Category A and Category B waste

Radionuclide	Category A		Category B	
	Activity (Ci)	Percentage (%)	Activity (Ci)	Percentage (%)
H-3	2.76E-05	5.90E-04	4.46E+00	3.87E+01
C-14	2.32E-01	4.96E+00	1.49E-01	1.29E+00
Mn-54				
Fe-55	8.29E-02	1.77E+00	4.14E-02	3.59E-01
Co-60	1.71E-01	3.65E+00	1.01E-01	8.73E-01
Ni-59				
Ni-63	4.11E+00	8.80E+01	2.66E+00	2.31E+01
Zn-65				
Sr-90	2.72E-04	5.83E-03	1.41E-01	1.22E+00
Nb-94				
Tc-99			3.15E-05	2.73E-04
Cs-137	6.63E-03	1.42E-01	3.45E+00	2.99E+01
Eu-152			4.67E-01	4.05E+00
Eu-154			2.06E-02	1.78E-01
Pu-238	1.91E-03	4.08E-02	1.19E-03	1.03E-02
Pu-239	1.49E-03	3.19E-02	9.79E-04	8.48E-03
Pu-241	5.72E-02	1.22E+00	3.47E-02	3.01E-01
Pu-242	8.08E-06	1.73E-04	5.03E-06	4.36E-05
Am-241	5.77E-03	1.24E-01	3.66E-03	3.17E-02
Cm-242			1.40E-14	1.21E-13
Cm-244	1.25E-03	2.67E-02	7.43E-04	6.44E-03

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3. Estimate of major nuclide composition Category C and Category D waste

Radionuclide	Category C		Category D	
	Activity (Ci)	Percentage (%)	Activity (Ci)	Percentage (%)
H-3	2.48E-04	2.01E-03	2.02E-01	1.25E+01
C-14	2.94E-03	2.38E-02	2.80E-02	1.74E+00
Mn-54	4.15E-05	3.36E-04		
Fe-55	4.78E+00	3.87E+01	2.39E-02	1.48E+00
Co-60	4.69E+00	3.79E+01	8.00E-02	4.97E+00
Ni-59	5.70E-02	4.61E-01		
Ni-63	2.82E+00	2.29E+01	1.23E+00	7.63E+01
Zn-65	5.79E-08	4.68E-07		
Sr-90	9.56E-05	7.74E-04	2.99E-03	1.86E-01
Nb-94	1.20E-04	9.72E-04		
Tc-99	1.50E-04	1.22E-03	3.16E-04	1.96E-02
Cs-137	4.07E-05	3.29E-04	3.83E-02	2.38E+00
Eu-152			3.95E-04	2.45E-02
Eu-154			1.74E-05	1.08E-03
Pu-238	2.25E-05	1.82E-04	1.34E-04	8.30E-03
Pu-239	1.94E-05	1.57E-04	1.54E-04	9.57E-03
Pu-241	6.80E-04	5.51E-03	4.65E-03	2.89E-01
Pu-242			4.54E-08	2.82E-06
Am-241	1.14E-04	9.26E-04	3.24E-04	2.01E-02
Cm-242	3.83E-07	3.10E-06		
Cm-244	1.56E-05	1.26E-04	3.12E-05	1.94E-03

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4. Solid Waste Disposition

<u>Number of Shipments</u>	<u>Mode of Transportation</u>	<u>Destination</u>
84	Highway	EnergySolutions, LLC (BWF) ^(a)
3	Highway	EnergySolutions, LLC (CWF) ^(b)
3	Highway	EnergySolutions, LLC (TF) ^(d)
41	Rail	EnergySolutions, LLC (BWF) ^(a)
3	Highway	Duratek Services, Inc.

5. Type of Container

- a. All shipment containers were "Strong Tight Containers" (STC).

6. Solidification Agent

- a. Not applicable

J. IRRADIATED FUEL SHIPMENTS (Disposition)

Number of Shipments

None

^(a) BWF stands for Bulk Waste Facility.

^(b) CWF stands for Containerized Waste Facility.

^(c) TF stands for Treatment Facility.

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ATTACHMENT 1

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LEAD DEPARTMENT:		EFFECTIVE DATE: 7/7/2008

SCOPE OF REVISION:

General: Reclassified the Reactor Building exhaust as a miscellaneous Release

1. Section 4.12 – Added Reactor Building as a Miscellaneous Release
2. Section 6.12 – Revised to indicate the Reactor Building is a miscellaneous Release.
3. Section 6.4.1 - Added the flow rate for the Reactor Building exhaust fan
4. Section 6.11.4 – Added Reactor Building to the second paragraph.

**THIS PROCEDURE IS ISSUED FOR INFORMATION ONLY AND
SHALL NOT BE USED FOR WORK OR DESIGN.**

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1.0 PURPOSE

The Off-site Dose Calculation Manual (ODCM) contains the methodology and parameters used in the calculation of off-site doses due to radioactive gaseous and liquid effluents. Methods are described for assessing compliance with the Technical Requirements in the ODCM as they apply to 10 CFR Parts 20.1301 and 20.1302, 10 CFR Part 50, Appendix I, 10 CFR 50.36a, and 40 CFR 190.10a for liquid and gaseous effluents. Additionally, the ODCM contains the Technical Requirements, which provide the Specifications, Applicability's, Actions, and Surveillance Requirements.

2.0 SCOPE

This procedure functions as a manual that provides the basis for development of detailed implementing procedures that address dose calculations for liquid/ gaseous releases. Additionally, this manual provides the Technical Requirements that govern releases of liquid and gaseous radioactive releases off-site.

- 2.1 Currently an installed liquid effluent pathway does not exist. The retention basins, associated valves, controllers and piping, and effluent monitoring instrumentation have been removed, dismantled, or abandoned in place. This was accomplished as part of the Decommissioning process. The main precursor to eliminating the permanently installed equipment and liquid effluent radiation monitor was the elimination of the major liquid effluent source terms.

3.0 REFERENCES/COMMITMENT DOCUMENTS

3.1 Commitment Documents

- 3.1.1 Code of Federal Regulations, Title 10, Chapter 1, Parts 20, 50.36a and Part 50, Appendix I
- 3.1.2 Rancho Seco Quality Manual (RSQM)
- 3.1.3 EPA 40 CFR Parts 302, 355 Reporting Requirements
- 3.1.4 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Plant Operations

3.2 Reference Documents

- 3.2.1 USNRC Regulatory Guide 1.109, Rev. 1, 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

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- 3.2.2 W. C. Burke, et. al., Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants, NUREG-0133, USNRC: NRR, October 1978
- 3.2.3 ORNL, User's Manual for LADTAP II, NUREG/CR-1276, May 1980
- 3.2.4 D. L. Strange, et. al., LADTAP-II, Technical Reference and User Guide, NUREG/CR-4013, Pacific Northwest Laboratory, April 1986
- 3.2.5 Eckerman, K. F., et. al., User's Guide to GASPAR Code, NUREG-0597, USNRC: NRR, June 1980, in RSIC CCC-463
- 3.2.6 USNRC Regulatory Guide 1.111, Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors
- 3.2.7 USNRC 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
- 3.2.8 USNRC Regulatory Guide 4.1, Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants
- 3.2.9 REIMS Software Life Cycle Documents (Software Requirement Specification, Design Document, Acceptance Test Plan)
- 3.2.10 USNRC & Pacific Northwest Laboratory, TDMC Computer Code/Data Collections, XOQDOQ-82, Radiological Assessment Code System Meteorological Evaluation of Routine Effluent Releases at Nuclear Power Stations
- 3.2.11 2006 Rancho Seco Biennial Land Use Census
- 3.2.12 RSNNGS DSAR Chapters 11.1-11.5
- 3.2.13 RSNNGS P&ID Drawing M-563, M-551, M-552
- 3.2.14 Pacific Northwest Laboratory, XOQDOQ: Computer Program for the Meteorological Evaluation of Routine Effluent Releases at Nuclear Power Stations
- 3.2.15 Congel, F. J., Methods for Demonstrating LWR Compliance with the EPA Uranium Fuel Cycle Standard (40 CFR Part 190), NUREG-0543, USNRC: NRR, February 1980
- 3.2.16 USNRC Generic Letter, 89-01, Dated January 31, 1989.
- 3.2.17 Rancho Seco REMP Manual
- 3.2.18 PDQ 92-063

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3.2.19 RP.312.I.14, Occupational Radiation Exposure Limits and Extensions

3.2.20 DQ 99-0061, 50.59 Rev. 1, Kurtz probe flow out of tolerance.

3.2.21 DQ-99-0053, SP.625A failed due to excessive system flow.

4.0 DEFINITIONS

4.1 Member of the Public

Means any individual except when that individual is receiving an occupational dose.

4.2 Occupational Dose

Means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation and/or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person. Occupational dose does not include dose received from background radiation, as a patient from medical practices, from voluntary participation in medical research programs, or as a member of the public.

4.3 Public Dose

Means the dose received by a Member of the Public from exposure to radiation and/or radioactive material released by a licensee, or to any other source of radiation under the control of a licensee. It does not include occupational dose or doses received from background radiation, as a patient from medical practices, or from voluntary participation in medical research programs.

4.4 Batch Release:

Liquid Batch Release is a transfer of a discrete volume of radioactive liquid from a temporary tank to the Waste Water discharge canal (the Environmental Release Point).

A Gaseous Release is the discharge of gaseous radioactive wastes that consist of tritium and/or radionuclides in particulate form.

4.5 Continuous Release

A continuous radioactive gaseous release is the discharge of gaseous waste during dismantlement activities.

Continuous radioactive liquid releases are not planned to be made from Rancho Seco Nuclear Generating Station (RSNGS).

4.6 Dilution Flow

The volume or volume rate of fluid (liquid), which is added to a radiological release stream for the purpose of decreasing the concentration of the stream.

4.7 Maximum Exposed (Hypothetical) Individual

The Maximum Exposed Individual is characterized as "maximum" with regard to food consumption, occupancy, and other usage or exposure pathway parameters in the vicinity of Rancho Seco that would represent an individual with habits greater than usually expected for the average of the population in general.

Maximum dose factor parameters will be determined using site-specific data from the Biennial Land Use Census. If information needed to determine a parameter is not available, RG 1.109 parameters will be used. All dose factor parameters used are listed in Attachment 1.

4.8 RSNGS

Rancho Seco Nuclear Generating Station

4.9 Site Boundaries

The Site Boundaries are defined by the drawings in Attachments 3 and 4.

4.10 Nuisance Pathways

- (1) Secondary system gaseous pathways where the calculated dose totals contribute less than 5% of the annual limits and do not need to be tracked for dose calculational purposes unless secondary activity reaches a predetermined Action Level.
- (2) Sources of trace levels of radioactivity in liquid effluents where the calculated dose totals contribute less than 1% of the annual limits and do not need to be tracked for dose calculational purposes. Trace levels are defined to be less than $1E-8$ $\mu\text{Ci/ml}$ for the nuclides typically released from RSNGS. Examples include the plant effluent inlet, and storm drains.

4.11 Unplanned Release

The unexpected release of radioactive materials to unrestricted areas in gaseous and liquid effluent. All unplanned releases shall be discussed in the Annual Radiological Effluent Release Report (ARERR) to the NRC.

4.12 Miscellaneous Release

Release pathways, which are considered planned but are not defined explicitly with monitoring requirements in this procedure. These pathways contribute a relatively small percentage (<5%) to the annual dose limits but shall be tracked for effluent activity accounting and dose calculation purposes. Miscellaneous releases shall not be reported in the ARERR as abnormal or unplanned releases. The Reactor Building and IOS Building are Miscellaneous Releases.

4.13 Safety Factor (SF)

A number greater than unity used in calculations to introduce greater conservatism (larger margin of safety) to offset various uncertainties in instrumentation and methods. Radiation Protection/Chemistry Supervision based on either analysis or professional judgment sets safety factors. Unless otherwise specified, the default value is two (2).

4.14 Ventilation Exhaust Treatment System (VETS)

The Ventilation Exhaust Treatment System is the Reactor Building Purge Exhaust Filtering System. This system is designed and installed to reduce radioactive material in exhaust gases through filters for the purpose of removing particulates from the gaseous exhaust stream prior to the release to the environment.

4.15 Instrument Surveillance

(1) Source Check

A source check is the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

(2) Channel Test

A channel test is the injection of an internal or external test signal into the channel to verify its proper response, including alarm and/or trip initiating action, where applicable.

(3) Instrument Channel Check

An instrument channel check is a verification of acceptable instrument performance by observation of its behavior and/or state; this verification includes comparison of output and/or state of independent channels measuring the same variable.

(4) Instrument Channel Calibration

An instrument channel calibration is a test, and adjustment (if necessary), to establish that the channel output responds with acceptable range and accuracy to known values of the parameter, which the channel measures, or an accurate simulation of these values. Calibration shall encompass the entire channel, including equipment actuation, alarm, or trip and shall be deemed to include the channel test.

4.16 Surveillance Intervals

The Surveillance Interval may be extended to a maximum of +25% to accommodate operations scheduling. The frequency notation (which follows the name of the Surveillance Interval in parenthesis) specified for the performance of Surveillance Requirements shall correspond to the Surveillance Intervals defined below.

- (1) Shift (S): A time period covering at least once per twelve (12) hours.
- (2) Daily (D): A time period spaced to occur at least once per twenty four (24) hours.
- (3) Weekly (W): A time period spaced to occur at least once per seven (7) days.
- (4) Monthly (M): A time period spaced to occur at least once per thirty one (31) days.

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- (5) Quarterly (Q): A time period spaced to occur at least once per ninety two (92) days.
- (6) Semiannually (SA): A time period spaced to occur at least once per six (6) months.
- (7) Annually (A): A time period spaced to occur at least once per twelve (12) months.
- (8) Refueling Interval (R): A time period spaced to occur at least once per eighteen (18) months.
- (9) Each Release (P): This surveillance will be completed prior to each release.

4.17 Radiological Effluent Information Management System (REIMS)

The computer software and database that tracks the volume and activity of released radioactive effluents. In addition, the software provides the basis for the permitting process, calculates dose to man, and summarizes data for inclusion into the ARERR.

4.18 Operable/ Operability

A component or system is Operable when it is capable of performing its intended function within the required range. The component or system shall be considered to have this capability when: (1) it satisfies the Specifications in Section 6.11, (2) it has been tested periodically in accordance with the Surveillance Requirement in Section 6.11 and has met its performance requirements, (3) the system has available its source of power, and (4) its required auxiliaries are maintained available and capable of performing their intended function.

5.0 RESPONSIBILITIES

5.1 Radiation Protection/Chemistry Superintendent

It is the responsibility of the Radiation Protection/Chemistry Superintendent for the following:

- 1) ODCM Revisions and Reporting the Revisions in the Annual Radioactive Effluent Release Report (ARERR)
- 2) ARERR Preparation and Submittal
- 3) REIMS Database
- 4) LADTAP, GASPAR, and XOQDOQ Computer Program Verifications and Changes

5.2 Commitment Management Review Group (CMRG)

The CMRG is responsible for reviewing and accepting all changes to the ODCM with approval by the Plant Manager per the Rancho Seco Quality Manual.

6.0 PROCEDURE

6.1 General Considerations

6.1.1 Liquid Effluent Pathways

The liquid effluent discharge of RSNRS forms the headwaters of Clay Creek.

Dilution of the liquid effluent occurs off-site in the seasonal creek (No Name Creek) just downstream of the Plant Outfall, which then joins Clay and Hadselville Creeks, and of Hadselville and Laguna Creeks, and at the confluence of Laguna Creek and the Cosumnes River.

Planned radioactive liquid releases (if necessary) will be directed through temporary tanks and piping to give reasonable assurance of compliance with 10 CFR 50 Appendix I prior to their discharge. Prior to discharge from the temporary system to the plant effluent (off-site), the discharge rate from the temporary system and the amount of dilution from Folsom South Canal are controlled to ensure compliance with the concentration requirements in 10 CFR 20.

6.1.2 Gaseous Effluent Pathways

The Reactor Building and Interim On-site Storage (IOS) Building are Miscellaneous Releases. Unplanned Releases shall be evaluated on a case-by-case basis.

6.1.3 Meteorological Data

The atmospheric dispersion (X/Q) and deposition (D/Q) factors used in calculations involving airborne effluent are conservative default values. The default X/Q value is $1.0E-4 \text{ sec/m}^3$, and the default D/Q value is $1.0E-6 \text{ m}^{-2}$. These factors should be used to determine monitor set points, assess compliance with the gaseous effluent requirements in Section 6.11, and calculate the gaseous effluent dose reported in the ARERR. Attachment 2 shows actual dispersion and deposition factors and is presented for historical information only.

6.1.4 Boundaries

The Site Boundary for Gaseous Effluents as shown in Attachment 3 is for all calculations involving gaseous effluents. The Site Boundary for Liquid Effluents as shown in Attachment 4 is for all calculations involving liquid effluents.

6.1.5 40 CFR 190 Compliance

For the purposes of assessing compliance with 40 CFR 190, the MEMBER OF THE PUBLIC which received the most exposure may be determined using actual food consumption, actual occupancy rates, and dilution off-site from additional converging streams (verses assumptions used for a HYPOTHETICAL MAXIMUM EXPOSED INDIVIDUAL based on Biennial Land Use Census data).

6.1.6 Computers vs. Manual Calculations

Computer systems such as REIMS should be used for calculations in order to minimize error and hasten the release process. However, in the event computers are not available for calculations, manual pre-release calculations should be done based on the most historically restrictive receptor.

6.2 Maximum Effluent Concentrations in Liquid Effluents

The Maximum Effluent Concentration Fraction is calculated to determine compliance with 10 CFR 20 requirements and the Specification in Step 6.11.1. Radioactive liquid effluent discharges normally originate in onsite temporary tank. Samples are collected and analyzed from each temporary tank prior to discharge to ensure that compliance with the Specification in Step 6.11.1 can be achieved.

In addition, calculations to determine the minimum dilution water flow rate and maximum temporary tank discharge flow rate to ensure compliance are provided in this section. Any combination of minimum dilution flow rate and maximum discharge flow rate, which satisfy the Specification, is acceptable.

6.2.1 Maximum Effluent Concentration Fraction (MECF)

Compliance with the Specification in Step 6.11.1 is anticipated when the MECF is less than or equal to 1.0. The MECF is calculated as follows:

$$MECF = \left[\sum_i \left(\frac{C_i}{MEC_i} \right) \right] \times \frac{F_r}{F_c + F_r}$$

Where:

MECF = The calculated fraction of Maximum Effluent Concentration in the radioactive liquid effluent discharged beyond the Site Boundary for Liquid Effluents (see Attachment 4).

C_i = The concentration (prior to dilution) of radionuclide i in the batch of liquid effluent in $\mu\text{Ci/ml}$.

MEC_i = The MEC of radionuclide i from Appendix B to 10 CFR Part 20, Table 2, Column 2, in $\mu\text{Ci/ml}$. The class with the most restrictive Effluent Concentration will be used for each isotope.

F_r = Discharge flow rate; the flow rate of the radioactive liquid batch release from the temporary tank to the Waste Water Discharge Canal (Plant Effluent) in gpm.

F_c = The total available dilution water (Plant Effluent) flow rate at the time of discharge of the radioactive liquid effluent in gpm.

6.2.2 Minimum Dilution Water Flow Rate (F_{cmin})

The minimum dilution water (Plant Effluent) flow rate (F_{cmin}) is calculated as follows:

$$F_{cmin} = F_r \times \left[\left(SF \times \sum_i \left\{ \frac{C_i}{MEC_i} \right\} \right) - 1 \right]$$

NOTE

$SF \times \sum_i (C_i/MEC_i)$ must be ≥ 1.0

Where:

F_r = A fixed effluent discharge flow (gpm) (as required by specific release restrictions).

SF = A factor which may be applied to incorporate a margin of conservatism ($SF \geq 1$).

6.2.3 Maximum Effluent Discharge Flow Rate (F_{max})

The maximum effluent discharge flow rate (F_{max}) is calculated as follows:

$$F_{max} = \frac{F_c}{\left[SF \times \sum_i \left(\frac{C_i}{MEC_i} \right) \right] - 1}$$

Where:

F_c = A fixed dilution water flow rate (gpm) (as required by specific release restrictions).

NOTE

$SF \times \sum_i (C_i/MEC_i)$ must be ≥ 1

6.3 Liquid Dose Calculations

This section provides the methodology to demonstrate compliance with the Specification in Step 6.11.2.

Site-specific organ dose factors for liquid effluents have been determined for the MAXIMUM EXPOSED INDIVIDUAL and are listed in Attachment 5. Dose factors (A_{ijap}) were derived using equations and methods in Regulatory Guide 1.109, Rev. 1 and LADTAP. The dose factor parameters used are listed in Attachment 1. As previously stated, site specific parameters should be used based on the Biennial Land Use Census in lieu of the values provided in RG 1.109 whenever possible.

The exposure pathways included in the A_{ijap} are those identified by the Biennial Land Use Census. The pathways considered for inclusion are:

- Fresh water fish
- Fresh water invertebrate
- River shoreline deposits
- Milk from cows that eat fresh or stored forage irrigated with Clay Creek water
- Meat from cows that eat fresh or stored forage irrigated with Clay Creek water
- Vegetation

6.3.1 Liquid Effluent Dose Equation

$$D_{aj} = \frac{\sum_i \sum_p (Q_i \times A_{ijap})}{F}$$

Where:

- D_{aj} = Annual calculated dose (50 year dose commitment) to the organ (or total body) j of a maximally exposed individual of age group a (mrem/yr).
- Q_i = Activity of isotope i released during the year (Ci/yr).
- A_{ijap} = Site-specific dose factor for an organ (or total body) j for a person of age group a via pathway p due to isotope i (mrem-ft³/Ci-sec).
- F = Annual average discharge volumetric flow rate (effluent water plus dilution water) in ft³/sec.

Because the dose rate varies linearly with activity release rate, the dose for a shorter period of time (mrem) may be calculated by substituting the activity released (Ci) during that period for Q_i in the above equation. However, volumetric flow rates should not be averaged over a period less than a calendar quarter. More conservative flow rates are acceptable.

6.4 Liquid Dose Projections

31-day dose projections are calculated to show compliance with the Specification in Step 6.11.3 Quarterly and Annual dose projections are calculated in compliance with the Specification in Step 6.11.9.

The following equations shall be used:

31-Day Projection:

$$D_{p31} = 31 \times \frac{D_{Yr}}{t_{Yr}}$$

Quarterly Projection:

$$D_{pQtr} = 91.3 \times \frac{D_{Qtr}}{t_{Qtr}}$$

Yearly Projection:

$$D_{pYr} = 365.25 \times \frac{D_{Yr}}{t_{Yr}}$$

Where:

- D_{p31} = 31-day dose projection.
- D_{Yr} = Cumulative annual dose to date.
- t_{Yr} = Number of days into the year.
- D_{pQtr} = Quarterly dose projection.
- D_{Qtr} = Cumulative quarterly dose to date.
- t_{Qtr} = Number of days into the quarter.
- D_{pYr} = Annual dose projection.

6.4.1 Gaseous Effluent Flow Rates

Flow rates used in routine gaseous effluent calculations for the pathways listed below are conservative default values. These flow rates should be used to determine monitor set points, assess compliance with the gaseous effluent requirements in Section 6.11, and calculate the gaseous effluent dose reported in the ARERR.

Gaseous effluent release points and maximum design flow rates used at RSNGS are as follows:

Reactor Building Stack	85000 CFM
Reactor Building Exhaust	34000 CFM
Interim On-site Storage Building Ventilation *	8,050 CFM

*The Interim On-site Storage (IOS) Building is not subject to continuous discharges of radioactivity. Because of the infrequency of a radioactive release, assessment will be done on each release according to administrative procedures.

6.5 Maximum Effluent Concentrations (MECs) in Gaseous Effluents

In order to demonstrate compliance with 10 CFR 20.1301, which requires that the total MEC fraction not exceed 1 when averaged over an entire year, the calculation is included in the Annual Radioactive Effluent Release Report. In addition, a four hour reporting requirement exists when the total MEC fraction exceeds 20 when averaged over one hour per 10 CFR 50.72. The following provides guidance on how to perform this calculation.

Maximum Effluent Concentration Fraction (MECF) Equation

$$MECF = \sum_i \left(\frac{C_i}{MEC_i} \right) \times F \times 4.72E-4 \times X/Q \times TR$$

Where:

- C_i = The concentration of nuclide i in mCi/cc.
- F = Maximum design volumetric flow rate in CFM as indicated in 6.5.1.
- X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m^3 . The default value in Step 6.1.3 will be used.
- MEC_i = The MEC for nuclide i from Appendix B to 10 CFR Part 20, Table 2, Column 2 ($\mu\text{Ci}/\text{cc}$). The class with the most restrictive Effluent Concentration will be used for each isotope.
- TR = If the time of release is less than one hour, then this value is the duration of the transient in minutes divided by sixty. Otherwise, the Time Ratio (TR) is one. Dimensionless.
- $4.72\text{E} - 4$ = The conversion factor in $\text{min} \cdot \text{m}^3 / \text{sec} \cdot \text{ft}^3$.

6.6 Dose Rate Calculations

The Specification in Step 6.11.5 provides a maximum limit on organ dose rate equivalent beyond the Site Boundary for Gaseous Effluents from tritium and all radioactive materials in particulate form with half-lives greater than 8 days. Compliance is determined by calculating the organ dose rate for the MAXIMUM EXPOSED INDIVIDUAL for the inhalation pathway only.

The organ dose rate resulting from inhalation is calculated with the equation:

Organ:

$$DO_{aj} = (X/Q) \times \sum_v \sum_i (Q_{vi} \times R_{aji})$$

Where:

- DO_{aj} = The dose commitment rate to organ j of a person in age group a (mrem/yr)
- R_{aji} = The factor to convert air concentration of radionuclide i to organ j dose commitment rate of a person in age group a exposed by inhalation ($\text{mrem} \cdot \text{m}^3 / \mu\text{Ci} \cdot \text{yr}$). See Attachment 7.
- Q_{vi} = The release rate of radionuclide i (not including Noble Gas nuclides), via effluent vent v during the time of the release ($\mu\text{Ci}/\text{sec}$)
- X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m^3 . The default value in Step 6.1.3 will be used.

Exposure to dose rate factors, R_{ajj} , for using equation 13 in RG 1.109, Rev. 1, derives inhalation. Tables E-5, E-7, E-8, E-9, and E-10 are assumed to represent the Maximum Exposed Individual in the equation to derive R_{ajj} .

6.7 Organ Dose Calculations for Gaseous Effluents

The Surveillance Requirement in Step 6.11.6 requires the radiation dose or dose commitment to the Maximum Exposed (Hypothetical) Individual accumulated from exposure to tritium and radioactive materials in particulate form having half-lives greater than 8.0 days, that originate in effluent air, be determined at least every month. The radiation dose or dose commitment accumulated during a calendar quarter and a year may not exceed values stated in the Specification in Step 6.11.6.

A person may be exposed to effluent radioactive material of this type in air by inhalation or indirectly via environmental pathways that involve deposition onto vegetation and the ground. The exposure pathways evaluated will include the following:

p	Exposure Pathway
1	Air - inhalation
2	Deposition onto ground - irradiation
3	Deposition onto vegetation - ingestion
4	Deposition onto forage - cow - milk - ingestion
5	Deposition onto forage - meat animal - meat - ingestion
6	Deposition onto forage - goat - milk - ingestion

The equation used to calculate the dose commitment to the Maximum Exposed (Hypothetical) Individual from radionuclides other than tritium is:

$$D_{aj} = \sum_{p=1} \left[(X/Q)_p \times \sum_v \sum_i (Q_{vi} \times R_{ajip}) \right] + \sum_{p=2}^6 \left[(D/Q)_p \times \sum_v \sum_i (Q_{vi} \times R_{ajip}) \right]$$

Where:

$p = 1$, i.e., air-inhalation, in the first term; and $p = 2, 3, 4, 5,$ and 6 in the second term of the equation excludes H-3.

D_{aj} = The dose commitment to organ j of a person in age group a (mrem)

Q_{vi} = The quantity of each radionuclide i , in particulate form having a half-life greater than 8.0 days, in air discharged via effluent stream v (μCi)

X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m^3 . The default value in Step 6.1.3 will be used.

D/Q = A conservative default deposition factor. A Factor converting a ground-level or building wake discharge in air to deposition on land (m^2). The D/Q value in Step 6.1.3 will be used.

R_{ajip} = A factor converting time integrated concentration of radionuclide i in air or deposited on vegetation and/or ground to radiation dose commitment to organ j , including total body, of a person in age group a who is exposed via pathway p .

When $p = 1$, representing air-inhalation, R_{ajip} has units of $\text{mrem}\cdot\text{m}^3/\mu\text{Ci}\cdot\text{yr}$. When $p=2, 3, 4, 5$ or 6 in the second term of the equation above, representing pathways involving deposition, R_{ajip} has units of $\text{mrem}\cdot\text{m}^2\cdot\text{sec}/\text{yr}\cdot\mu\text{Ci}$. When the radionuclide is H-3, R_{ajip} has units of $\text{mrem}\cdot\text{m}^3/\mu\text{Ci}\cdot\text{yr}$.

Tritium is assumed not to deposit onto vegetation or the ground. Hence, the concentration in vegetation is assumed to be related to the local atmospheric concentration as described in RG 1.109, Rev. 1, Appendix C. The dose commitment to the Maximum Exposed (Hypothetical) Individual from tritium in gaseous effluent is calculated with the equation:

$$D_{aj} = 3.17E-8 \times \sum_p \left[(X/Q)_p \times \sum_v (Q_{vi} \times R_{ajip}) \right]$$

Where:

$p = 1, 3, 4, 5,$ and 6

i includes H-3 only

X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m^3 . The default value in Step 6.1.3 will be used.

$3.17E-8 = \text{years}/\text{sec}$

Other terms as defined in previous section.

Dose factors R_{ajip} for RSNGS are derived using the equations and methods in RG 1.109, Rev. 1, Appendix C. Values of parameters in RG 1.109, Rev. 1, Table E-5 are assumed to represent the Maximum Exposed (Hypothetical) Individual unless Land Use Census data justify a different value. Any different values from default values will be justified and added as a table to the ODCM. Values of other parameters recommended in RG 1.109, Rev. 1, including those recommended in the absence of site-specific data, are used in the equations to derive the dose factors. (GASPAR or REIMS may be used to perform the calculations.)

6.8 Gas Dose Projections

31-Day Dose projections are calculated to show compliance with Step 6.11.9. Quarterly and Annual dose projections are calculated in compliance with the Specification in Step 6.11.9. The dose projection equations are the same as used for liquid per Step 6.4.

6.9 Fuel Cycle Dose

If a calculated dose exceeds twice the limit of the Specification in Step 6.11.2 and 6.11.6 or a level in Table 3 of the REMP Manual is exceeded, an assessment of compliance with the Specification in Step 6.11.8 must be made.

Liquid dose calculations shall be made using the general methodology of Step 6.4. Gas dose calculations shall be made using the general methodology of Steps 6.6 and 6.7. These methodologies are to be used as a guide and strict adherence is not required because the Fuel Cycle Dose Calculation is done to determine the actual dose received, not a hypothetical maximum. Therefore, parameters such as dilution beyond the site boundary and residential shielding may be factored into the calculation.

The total body and organ doses shall be the result of summing the individual contributions from liquid, gas, and direct radiation sources for the affected Member of the Public.

Irradiation, i.e., exposure to an external source of radiation, directly from the RSNGS normally will be evaluated with the aid of environmental monitoring dosimetry.

6.10 EPA Reporting Requirements

If a calculated dose exceeds the Specification limit of Step 6.11.1, 6.11.2, 6.11.5, or 6.11.6, an assessment of compliance with 40 CFR Parts 302 and 355, Reportable Quantity Adjustment - Radionuclides, must be made.

This involves determining the maximum quantity of radionuclides released in a 24 hour period and comparing the quantities to the values listed in 40 CFR 302 Appendix B. The "sum of the ratios" method shall be used to determine compliance. If the "sum of the ratios" is greater than one, the National Response Center shall be notified.

Since Rancho Seco's systems and procedures are set up to normally operate within the above limits, this condition is not expected to occur, therefore, specific implementation procedures to determine compliance are not required.

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6.11 Technical Requirements

6.11.1 Maximum Effluent Concentrations in Liquid Effluents

Specifications:

The concentration of radioactive material released in liquid effluents at any time beyond the Site Boundary for Liquid Effluents (see Attachment 4) shall be limited to the concentrations specified in Appendix B to 10 CFR Part 20, Table 2, Column 2.

Applicability:

This is applicable at all times.

Action:

With the concentration of radioactive material released from the site to areas beyond the Site Boundary for Liquid Effluents exceeding the above Specifications, immediately restore concentration within the required limits and report the event in the next Annual Radioactive Effluent Release Report.

Surveillance Requirements:

The radioactivity concentration of each temporary tank to be discharged shall be determined prior to release by sampling and analysis in accordance with Attachment 9. The results of the temporary tank pre-release sample analyses shall be used with the calculational methods described in Step 6.2 to ensure that the concentration at the point of release is within the limits of the above Specification.

Bases:

This Specification is provided to ensure that the concentration of radioactive materials released in liquid waste effluents from the site to areas beyond the Site Boundary For Liquid Effluents (see Attachment 4) will be less than the concentration levels specified in Appendix B to 10 CFR Part 20, Table 2, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water outside the site will result in exposures within the limits of 10 CFR Part 20.1301 to a MEMBER OF THE PUBLIC.

There are no continuous releases of radioactive material in liquid effluents from the plant. All radioactive liquid effluent releases from the plant are by batch method.

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6.11.2 Liquid Dose Calculations

Specifications:

The dose or dose commitment to a MAXIMUM EXPOSED (HYPOTHETICAL) INDIVIDUAL from radioactive materials in liquid effluents released beyond the Site Boundary for Liquid Effluents (see Attachment 4) shall be limited to:

- 1) Less than or equal to 1.5 mrem to the total body and to less than or equal to 5.0 mrem to any organ during any calendar quarter; and,
- 2) Less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ during any calendar year.

Applicability:

At all times.

Action:

With the calculated dose or dose commitment from the release of radioactive materials in liquid effluents exceeding any of the above Specifications, prepare and submit to the Commission within 30 days a Special Report. This Report will identify the cause(s) for exceeding the limit(s) and define the corrective actions to be taken to reduce the releases of radioactive material in liquid effluents and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above Specifications.

Surveillance Requirements:

Cumulative dose assessments associated with the release of radioactive liquid effluent shall be determined by sampling and analysis in accordance with Attachment 9, and calculations performed in accordance with the methodology described in Step 6.4 at the following frequencies:

- 1) Prior to the initiation of a release of radioactive liquid effluent from the temporary tank(s); and,
- 2) Upon verification of monthly composite analysis results for radioactive liquid effluent released from the temporary tank(s).

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A dose tracking system and administrative dose limits shall be established and maintained. With the 31-day dose projection in excess of the limits in Step 6.11.2, adjust liquid effluent operating parameters to give reasonable assurance of compliance with the dose limits of this Specification (10 CFR 50, Appendix I dose guidelines) and maintain radioactive liquid releases as low as is reasonably achievable.

Bases:

ODCM Step 6.11.2 is provided to implement the requirements of Sections II.A, III.A, and IV.A of Appendix I, 10 CFR Part 50. This step implements the guides set forth in Section II.A of 10 CFR 50, 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 10 CFR 50, Appendix I to assure that the releases of radioactive material in liquid effluents will be kept "as low as is reasonably achievable." The dose calculation methodology in this manual implement the requirements in Section III.A of 10 CFR 50, Appendix I that conformance with the guides of 10 CFR 50, Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of an individual through appropriate pathways is unlikely to be substantially underestimated.

The equations specified in this manual 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. There is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in finished drinking water that are in excess of the requirements of 40 CFR 141.

The Lower Limits of Detection established in Attachment 9 are based on an estimated maximum annual effluent outflow of 2 million gallons with a minimum annual average flow rate in the plant effluent stream of 6,000 gallons per minute. The temporary tank pre-release and monthly composite Lower Limits of Detection equate to an off-site dose of less than 10 percent of the 10 CFR 50, Appendix I guidelines. These Lower Limits of Detection, along with the dose tracking system, give reasonable assurance that the dose limits prescribed in ODCM Step 6.11.2 (the 10 CFR 50, Appendix I dose guidelines) will be met.

6.11.3 Radioactive Liquid Effluent Treatment

Specifications:

A radioactive liquid effluent treatment process shall be used to reduce the quantity of radioactive materials in liquid effluent prior to their discharge when projected doses due to the liquid effluent beyond the Site Boundary for Liquid Effluents (see Attachment 4), when averaged over 31 days, would exceed 0.25 mrem to the total body or 0.83 mrem to any organ (8.33% of the 10 CFR 50, Appendix I annual guidelines).

Applicability:

At all times.

Action:

With radioactive liquid 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:

- 1) Explanation of why liquid Radwaste was being discharged without treatment,
- 2) Action(s) taken to restore treatment capability and,
- 3) Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements:

Doses due to liquid releases to areas beyond the Site Boundary for Liquid Effluents shall be projected prior to each temporary tank release in accordance with the methodology described in Step 6.4.

Bases:

The liquid effluent source term and time constraints for releases have been significantly reduced with the current plant configuration. Use of a radioactive liquid effluent treatment process whenever liquid effluent requires treatment prior to release to the environment, provides reasonable assurance that the releases of radioactive materials in liquid effluent are maintained "as low as is reasonably achievable." This specification implements the requirements of 10 CFR Part 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 50. The specified dose limits are the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

6.11.4 Gaseous Effluent Monitoring

Instrumentation requirements for gaseous effluent monitoring are presented in Attachment 10.

The Reactor Building and IOS Building have ventilation systems in which the effluent releases are sampled during work events that generate airborne particulate activity. Operation of the respective ventilation systems produces a negative pressure in the buildings. Although no planned airborne radioactive releases are anticipated from these pathways, refer to Attachment 11 when sampling the ventilation exhaust from these buildings.

6.11.5 Gaseous Dose Rates

Specifications:

The dose rate due to radioactive materials released in gaseous effluents from the site to areas at or beyond the Site Boundary for Gaseous Effluents (see Attachment 3) shall be limited to the following values:

- 1) The dose rate limit for tritium and for all radioactive materials in particulate form with half-lives greater than 8 days shall be less than or equal to 1500 mrem/yr to any organ.

Applicability:

This is applicable at all times.

Action:

With the dose rate(s) exceeding the above limits, immediately restore the release rate to within the limit(s) specified and report the event in the next Annual Radioactive Effluent Release Report.

Surveillance Requirements:

Obtaining representative samples and performing analyses in accordance with the sample analyses program specified in Attachment 11 shall determine the release rate of radioactive materials in gaseous effluents.

The dose rate due to tritium and all radioactive material in particulate form with half-lives greater than 8 days, released in gaseous effluents, shall be determined to be within the limits of this Specification by using the results of the sampling and analysis program specified in Attachment 11 and the methodology described in Step 6.6.

Bases:

Step 6.11.5 is provided to ensure that the dose rate from gaseous effluents due to inhalation at any time at the Site Boundary for Gaseous Effluents (see Attachment 3) will be within the annual dose limits of 10 CFR Part 20 for MEMBERS OF THE PUBLIC. The annual dose limits are the doses associated with the concentrations of Appendix B to 10 CFR Part 20, Table 2, Column 1. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of an individual at or beyond the Site Boundary for Gaseous Effluents to annual average concentrations exceeding the dose rate equivalent, on which the limits specified in Appendix B, Table 2 of 10 CFR Part 20 were derived. For individuals who may at times be within the Site Boundary for Gaseous Effluents, the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the boundary.

6.11.6 Gaseous Organ Dose

Specifications:

The dose or dose commitment to a MAXIMUM EXPOSED (HYPOTHETICAL) INDIVIDUAL from tritium and radioactive materials in particulate form with half-lives greater than eight days in gaseous effluents released to areas at or beyond the Site Boundary for Gaseous Effluents (see Attachment 3) shall be limited to the following:

- 1) During any calendar quarter, to less than or equal to 7.5 mrem to any organ; and,
- 2) During any calendar year, to less than or equal to 15 mrem to any organ.

Applicability:

This is applicable at all times.

Action:

With the calculated dose or dose commitment from the release of tritium and radioactive materials in particulate form with half-lives greater than eight days in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days a Special Report. This Report will identify the cause(s) for exceeding the limit and define the corrective actions to be taken to reduce the releases and the proposed corrective action(s) to be taken to assure that subsequent releases will be in compliance with the above annual limits.

Surveillance Requirements:

Cumulative dose contributions for the current calendar quarter and calendar year period shall be determined in accordance with the methodology described in Step 6.7 at least monthly.

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Bases:

Step 6.11.5 is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Specifications are the guides set forth in Section II.C of 10 CFR 50, 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 10 CFR 50, Appendix I to assure that the releases of radioactive materials in gaseous effluents will be kept "As Low As is Reasonably Achievable (ALARA)." The calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of 10 CFR 50, Appendix I that conformance with the guides of 10 CFR 50, Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of an individual through appropriate pathways is unlikely to be substantially underestimated. For individuals who may at times be within the Site Boundary for Gaseous Effluents, the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric dispersion factor above that for the boundary.

The calculational methods 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, "Calculating 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. These equations also provide for estimating doses based upon the historical average atmospheric conditions.

The release rate specifications for radioactive materials in particulate form are dependent on the existing radionuclide pathways to man in areas at or beyond the Site Boundary for Gaseous Effluents (see Attachment 3). The pathways which were examined in the development of these calculations are: (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.

6.11.7 Ventilation Exhaust Treatment System

Specifications:

The VENTILATION EXHAUST TREATMENT SYSTEM shall be sampled during dismantlement activities.

The following two conditions shall not exist simultaneous:

- (1) Gaseous waste is being discharged without treatment, and
- (2) The projected doses due to gaseous effluent releases from the site (see Attachment 3), when averaged over 31 days, would exceed 2% of the 10 CFR 50, Appendix I annual dose guidelines (0.3 mrem to any organ, or air doses of 0.2 mrad from gamma radiation or 0.4 mrad from beta radiation).

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Applicability:

This is applicable at all times.

Action:

If both parts 1) and 2) of the Specification are satisfied, prepare and submit to the Commission within 30 days a Special Report pursuant to Appendix A of the RSQM, which includes the following information:

- a. Explanation of why gaseous Radwaste was being discharged without treatment, and identification of the equipment or subsystems not OPERABLE and the reason for inoperability.
- b. Action(s) taken to restore the inoperable equipment to OPERABLE STATUS.
- c. Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements:

Doses due to gaseous releases to areas at and beyond the Site Boundary for Gaseous Effluents (see Attachment 3) shall be projected at least once per 31 days in accordance with the methodology and parameters in Step 6.8.

Filter integrity is ensured through effluent sampling

Bases:

The operation of the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the systems are 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 are maintained "as low as is reasonably achievable". The specified limits governing the use of appropriate portions of the systems and the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR 50, for gaseous effluents.

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6.11.8 Fuel Cycle Dose

Specification:

The dose or dose commitment to any real MEMBER OF THE PUBLIC due to releases of radioactive material in gaseous and liquid effluents and to direct radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrem to the total body or any organ in a calendar year.

Applicability:

At all times.

Action:

- 1) With the calculated doses from the release of radioactive material in liquid or gaseous effluents exceeding twice the limits of Specifications in Steps 6.11.2 and 6.11.76 or exceeding the reporting levels in Table 3 of the REMP Manual, calculations shall be made including direct radiation contributions (including outside storage tanks, etc.) to determine whether the above specifications have been exceeded.
- 2) If the above limits have been exceeded, 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 Part 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, in a 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.
- 3) If the estimated dose(s) exceed the above limits, and if the release condition resulting in the 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 provision of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

Surveillance Requirements:

Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Step 6.11.2 and 6.11.5 Surveillance Requirements.

Cumulative dose contributions from direct radiation (including outside storage tanks, etc.) shall be determined in accordance with Step 6.9. This requirement is applicable only under the conditions set forth in the above Action statements.

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Bases:

Step 6.11.8 is provided to meet the dose limitations of 40 CFR 190 that have been incorporated into 10 CFR 20 by 46 FR 18525. The specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant radioactive effluents exceed twice the numerical guides for design objective doses of 10 CFR 50, Appendix I or exceeds the reporting levels of the Radiological Environmental Monitoring Program. For the Rancho Seco site, it is unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR 190 if the plant remains within twice the numerical guides for design objectives of 10 CFR 50, Appendix I and if direct radiation (outside storage tanks, etc.) is kept small. The Special Report will describe a course of action, which should result in the limitation of the dose to a MEMBER OF THE PUBLIC for a calendar year to within the 40 CFR 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 5 miles must be considered. If the dose to any MEMBER OF THE PUBLIC is evaluated to exceed the requirements of 40 CFR 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR 190 have not already been corrected), in accordance with the provisions of 40 CFR 190 is considered to be a timely request and fulfills the requirements of 40 CFR 190 until NRC staff action is completed. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation, which is part of the uranium fuel cycle.

6.11.9 Quarter/ Annual Dose Projections

Specifications:

The projected dose contributions from liquid and gaseous effluents for the current calendar quarter and current calendar year shall be calculated according to the methodology in Steps 6.4 and 6.8 at least every 31 days.

Applicability:

At all times.

Action:

With the required dose calculations not being performed, best effort will be exerted to perform the calculations once the deficiency has been identified. Corrective actions will be taken and documented to prevent reoccurrence.

Surveillance Requirements

1) Liquid Effluents:

Projected dose contributions shall be determined at least every 31 days.

2) Gaseous Effluents:

Projected dose contributions shall be determined at least every 31 days.

Bases:

This step is provided to implement Appendix A of the Rancho Seco Quality Manual. Dose projections provide a means of determining if current release practices will be within the dose limits of 10 CFR 50, Appendix I. Calculating projected dose totals every 31 days provides information, which can be used to keep effluent releases "as low as is reasonably achievable".

Calculations performed during the first 15 days of the calendar year or calendar quarter will result in artificially high dose projections, which provide no usable information.

6.12 Reports

6.12.1 Annual Radioactive Effluent Release Report (ARERR)

The ARERR covering the activities of the unit during the previous 12 months shall be submitted within 90 days after January 1 of each year. The report shall include the following:

- (1) Summary of the quantities of radioactive liquid and gaseous effluents released from the unit.
- (2) Summary of solid waste shipped from the unit.
- (3) All unplanned releases of radioactive materials in gaseous and liquid effluents to unrestricted areas shall include a description of the event and equipment involved, cause(s), action(s) taken to prevent recurrence, and consequences.
- (4) Dose or dose commitment assessments to ensure compliance with the specifications in 6.11.2, 6.11.6.
- (5) Complete, legible copy of the entire ODCM and/or REMP Manual if changes occurred during the ARERR reporting period. The copy may be part of the ARERR or sent concurrently.
- (6) The ARERR shall also include events described in 6.11.1, 6.11.3, and 6.11.4.

6.12.2 30 Day Reports

The following 30-day reports should be submitted if the criteria are met as stated in the following areas:

- (1) 6.11.2 - Liquid Dose Calculations
- (2) 6.11.9 - Liquid Dose Projections
- (3) 6.11.6 - Gaseous Organ Dose
- (4) 6.11.9 - Gaseous Dose Projections
- (5) 6.11.8 - Fuel Cycle Dose

7.0 RECORDS

The individual/packaged documents and related correspondence completed as a result of the performance or implementation of this procedure are records. They shall be transmitted to Records Management in accordance with RSAP-0601, Nuclear Records Management.

DOSE FACTOR PARAMETERS

CONSUMPTION AND USAGE PARAMETERS

<u>PATHWAY</u>	<u>AGE</u>	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Irrigated Stored Vegetables	Adult	520 kg/yr	520 kg/yr
	Teen	630 kg/yr	630 kg/yr
	Child	520 kg/yr	520 kg/yr
	Infant	0 kg/yr	0 kg/yr
Irrigated Fresh Vegetables	Adult	64 kg/yr	64 kg/yr
	Teen	42 kg/yr	42 kg/yr
	Child	26 kg/yr	26 kg/yr
	Infant	0 kg/yr	0 kg/yr
Irrigated Milk	Adult	310 kg/yr	310 kg/yr
	Teen	400 kg/yr	400 kg/yr
	Child	330 kg/yr	330 kg/yr
	Infant	330 kg/yr	330 kg/yr
Irrigated Meat & Poultry	Adult	110 kg/yr	110 kg/yr
	Teen	65 kg/yr	65 kg/yr
	Child	41 kg/yr	41 kg/yr
	Infant	0 kg/yr	0 kg/yr
Fish	Adult	21 kg/yr	21 kg/yr
	Teen	16 kg/yr	16 kg/yr
	Child	6.9 kg/yr	6.9 kg/yr
	Infant	0 kg/yr	0 kg/yr
Other Seafood Invertebrate (Crayfish)	Adult	5.0 kg/yr	6.9 kg/yr
	Teen	3.8 kg/yr	5.2 kg/yr
	Child	1.7 kg/yr	2.2 kg/yr
	Infant	0 kg/yr	0 kg/yr
Algae	Adult	None	0 kg/yr
	Teen	None	0 kg/yr
	Child	None	0 kg/yr
	Infant	None	0 kg/yr
Water Usage (Drinking Water)	Adult	730 l/yr	0 l/yr
	Teen	510 l/yr	0 l/yr
	Child	510 l/yr	0 l/yr
	Infant	330 l/yr	0 l/yr

DOSE FACTOR PARAMETERS (Continued)

CONSUMPTION AND USAGE PARAMETERS (continued)

<u>PATHWAY</u>	<u>AGE</u>	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Shoreline Recreation	Adult	12 hr/yr	200 hr/yr
	Teen	67 hr/yr	100 hr/yr
	Child	14 hr/yr	14 hr/yr
	Infant	0 hr/yr	0 hr/yr
Swimming	Adult	None	100 hr/yr
	Teen	None	100 hr/yr
	Child	None	14 hr/yr
	Infant	None	0 hr/yr
Boating	Adult	None	0 hr/yr
	Teen	None	0 hr/yr
	Child	None	0 hr/yr
	Infant	None	0 hr/yr
Inhalation	Adult	8000 m ³	8000 m ³
	Teen	8000 m ³	8000 m ³
	Child	3700 m ³	3700 m ³
	Infant	1400 m ³	1400 m ³

IRRIGATION RATES AND FRACTION OF IRRIGATION

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Irrigation Rate	263 liters/m ² /month	263 liters/m ² /month
Time field has been irrigated prior to crop of interest	15 years	15 years
Fraction of the year field is irrigated	None	None
Fraction of animal water intake not obtained from the irrigation system (Irrigated Meat)	None	0
Fraction of animal water intake not obtained from the irrigation system (Irrigated Milk)	None	1

DOSE FACTOR PARAMETERS (Continued)

TRANSIT, TRANSFER, AND HOLDUP TIMES

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Irrigated Stored Vegetables Holdup Time	1440 hrs	1440 hrs
Irrigated Fresh Vegetables Holdup Time	24 hrs	24 hrs
Irrigated Milk Holdup Time	48 hrs	48 hrs
Irrigated Meat Holdup Time	480 hrs	480 hrs
Transit Time From Time Of Sample To Time Of Release	None	72 hrs
Transit Time To Drinking Water	None	0 hrs

DILUTIONS

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
All Pathways	None	1(None)
Shore-Width Factor	0.2	0.2

MISCELLANEOUS

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Fraction Of Leafy Vegetables Grown In Garden Of Interest	1.0	1.0
Fraction Of Produce Ingested Grown In Garden Of Interest	0.76	0.76
Crop Growing Time For Leafy Vegetables Ingested By Man	60 Days	30 Days
Crop Growing Time For Pasture Grass	30 Days	30 Days
Crop Yield For Leafy Vegetables Ingested By Man	2.0 kg/m ²	2.0 kg/m ²
Crop Yield For Pasture Grass	0.7 kg/m ²	2.0 kg/m ²

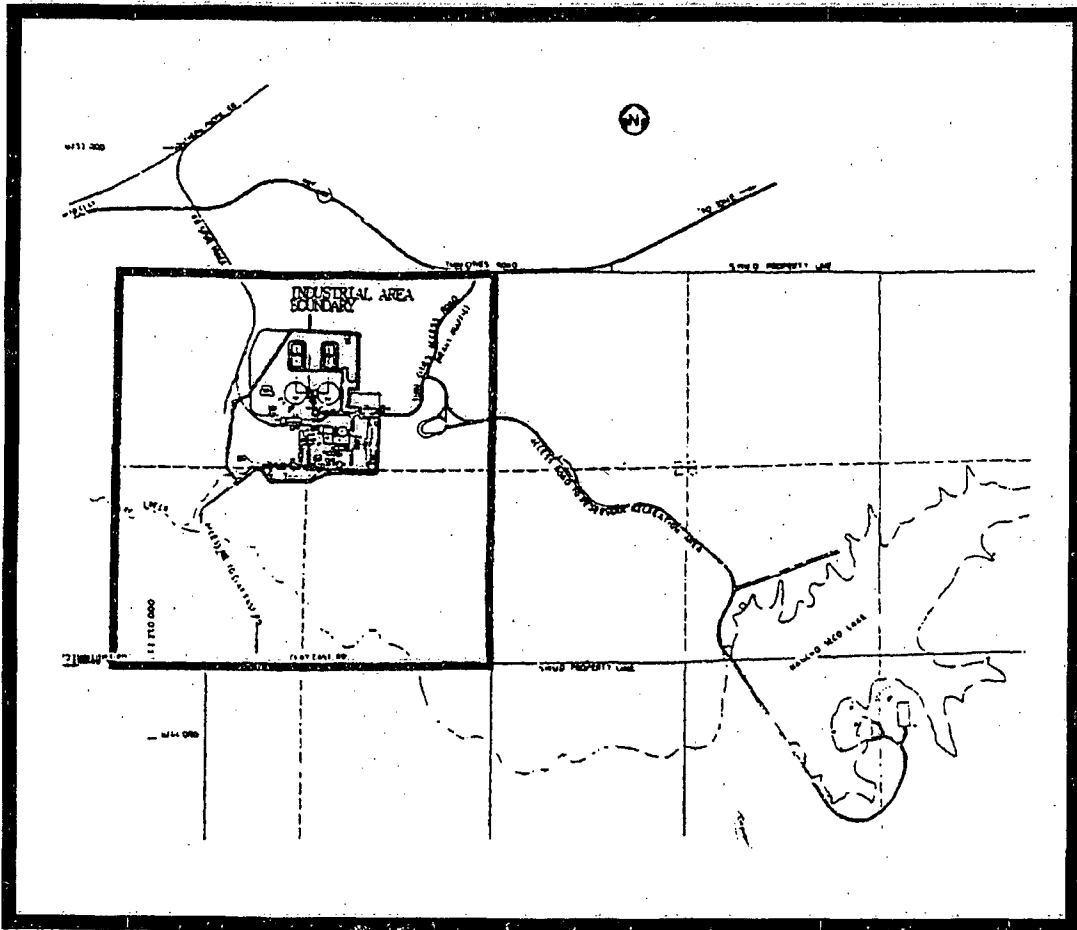
ATMOSPHERIC DISPERSION AND DEPOSITION PARAMETERS
GASEOUS EFFLUENT PATHWAYS
1998 CONTROLLING LOCATIONS**

<u>PATHWAY</u>	<u>DIRECTION</u>	<u>DISTANCE</u>	<u>X/Q*</u> (sec/m ³)	<u>D/Q*</u> (m ⁻²)
Inhalation	ENE	1038 M	8.1E-06	--
Ground	ENE	1038 M	--	4.8E-08
Vegetation	SSW	670 M	1.4E-05	2.8E-08
Cow Milk	ENE	1038 M	8.1E-06	4.8E-08
Meat Animal	S	195 M	1.2E-04	--
Meat Animal	SSE	198 M	--	3.4E-07
Goat Milk	SSW	2500 M	1.0E-06	1.7E-09
Site Boundary for Gaseous Effluents	NNW	670 M	2.1E-05	--

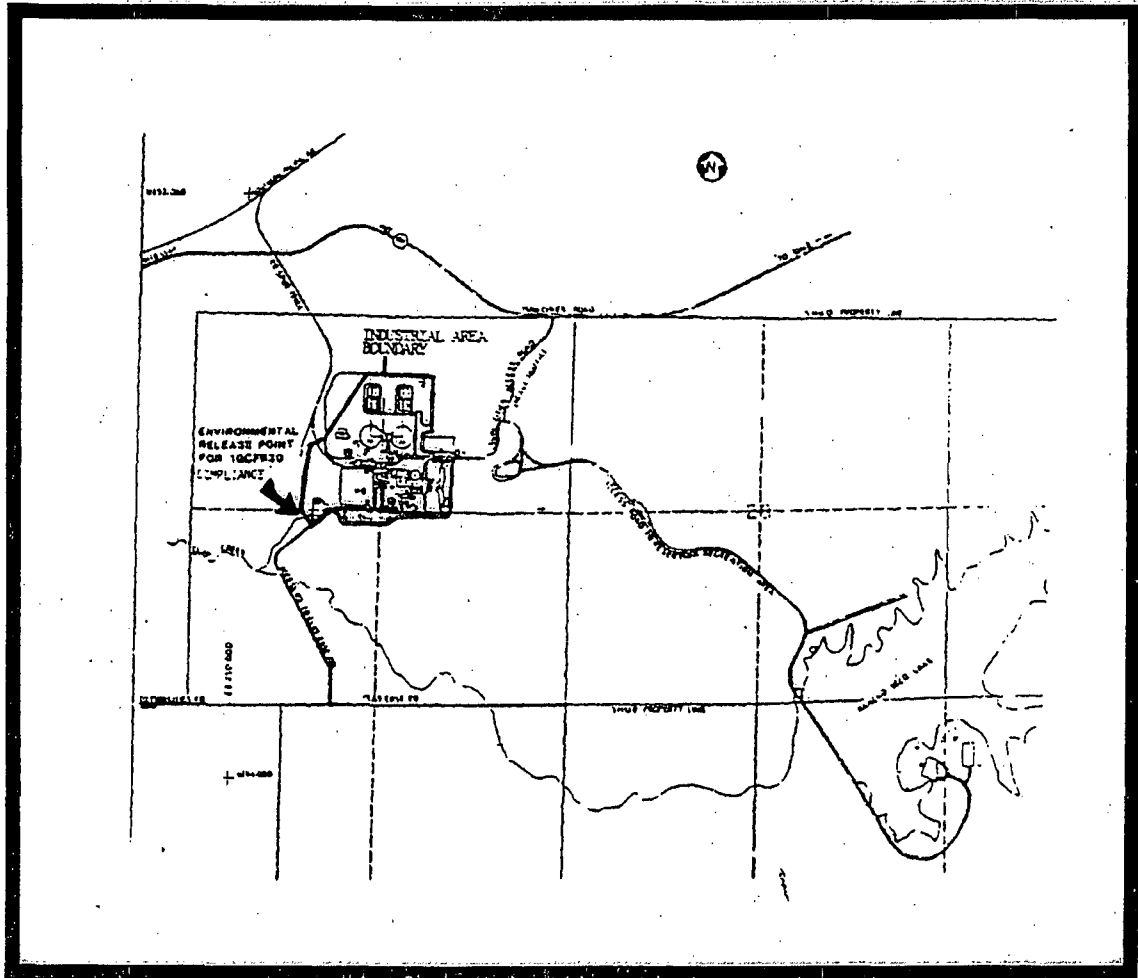
* Based on meteorological data from January 1978 to December 1987.

** Based on 1998 Land Use Census.

SITE BOUNDARY FOR GASEOUS EFFLUENTS



SITE BOUNDARY FOR LIQUID EFFLUENTS



ORGAN DOSE FACTORS FOR LIQUID EFFLUENTS

DOSE FACTOR TABLE: A(i) - Adult
Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.21E+01	1.21E+01	1.21E+01	1.21E+01	1.21E+01	1.21E+01
C-14	3.82E+05	7.63E+04	7.63E+04	7.63E+04	7.63E+04	7.63E+04	7.63E+04
FE-55	1.18E+04	8.17E+03	1.91E+03	7.29E-04	7.29E-04	4.56E+03	4.69E+03
CO-60	1.26E+04	1.61E+04	2.02E+04	1.26E+04	1.26E+04	1.26E+04	7.73E+04
NI-63	3.42E+05	2.37E+04	1.15E+04	0.00E+00	0.00E+00	0.00E+00	4.95E+03
CS-134	4.44E+05	1.05E+06	8.59E+05	4.03E+03	3.43E+05	1.16E+05	2.23E+04
CS-137	5.85E+05	7.98E+05	5.25E+05	6.06E+03	2.75E+05	9.54E+04	2.14E+04

DOSE FACTOR TABLE: A(i) - Teen
Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.37E+01	1.37E+01	1.37E+01	1.37E+01	1.37E+01	1.37E+01
C-14	5.64E+05	1.13E+05	1.13E+05	1.13E+05	1.13E+05	1.13E+05	1.13E+05
FE-55	1.37E+04	9.69E+03	2.26E+03	7.29E-04	7.29E-04	6.15E+03	4.19E+03
CO-60	6.35E+03	1.10E+04	1.69E+04	6.35E+03	6.35E+03	6.35E+03	6.71E+04
NI-63	4.50E+05	3.18E+04	1.53E+04	0.00E+00	0.00E+00	0.00E+00	5.06E+03
SR-90	7.40E+06	6.16E-03	1.98E+06	6.16E-03	6.16E-03	6.16E-03	3.85E+05
CS-134	5.04E+05	1.18E+06	5.50E+05	2.03E+03	3.77E+05	1.45E+05	1.67E+04
CS-137	6.99E+05	9.30E+05	3.26E+05	3.03E+03	3.18E+05	1.26E+05	1.62E+04

DOSE FACTOR TABLE: A(i) - Child
Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	2.10E+01	2.10E+01	2.10E+01	2.10E+01	2.10E+01	2.10E+01
FE-55	2.40E+04	1.27E+04	3.94E+03	1.02E-04	1.02E-04	7.19E+03	2.35E+03
CO-60	8.89E+02	7.51E+03	2.04E+04	8.89E+02	8.89E+02	8.89E+02	3.76E+04
SR-90	1.47E+07	8.62E-04	3.93E+06	8.62E-04	8.62E-04	8.62E-04	2.97E+05
CS-134	7.61E+05	1.25E+06	2.64E+05	2.85E+02	3.87E+05	1.39E+05	7.02E+03
CS-137	1.12E+06	1.07E+06	1.59E+05	4.25E+02	3.50E+05	1.26E+05	7.15E+03

ORGAN DOSE FACTORS FOR LIQUID EFFLUENTS (Continued)

DOSE FACTOR TABLE: A(i) - Infant

Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.14E+01	1.14E+01	1.14E+01	1.14E+01	1.14E+01	1.14E+01
FE-55	5.61E+02	3.63E+02	9.69E+01	0.00E+00	0.00E+00	1.77E+02	4.61E+01
CO-60	0.00E+00	3.81E+02	8.99E+02	0.00E+00	0.00E+00	0.00E+00	9.06E+02
NI-63	1.72E+05	1.06E+04	5.97E+03	0.00E+00	0.00E+00	0.00E+00	5.29E+02
SR-90	3.91E+05	0.00E+00	1.05E+05	0.00E+00	0.00E+00	0.00E+00	7.22E+03
CS-134	1.55E+05	2.89E+05	2.92E+04	0.00E+00	7.43E+04	3.05E+04	7.84E+02
CS-137	2.32E+05	2.71E+05	1.92E+04	0.00E+00	7.27E+04	2.94E+04	8.47E+02

ORGAN DOSE FACTORS FOR GASEOUS EFFLUENTS

DOSE FACTOR TABLE: R(i) - Adult, inhalation
Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03
FE-55	2.46E+04	1.70E+04	3.95E+03	0.00E+00	0.00E+00	7.21E+04	6.03E+03
CO-60	0.00E+00	1.15E+04	1.48E+04	0.00E+00	0.00E+00	5.97E+06	2.85E+05
SR-90	9.92E+07	0.00E+00	6.10E+06	0.00E+00	0.00E+00	9.60E+06	7.22E+05
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	4.79E+05	6.21E+05	4.28E+05	0.00E+00	2.23E+05	7.52E+04	8.40E+03

DOSE FACTOR TABLE: R(i) - Teen, inhalation,
Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03
FE-55	3.35E+04	2.39E+04	5.55E+03	0.00E+00	0.00E+00	1.24E+05	6.39E+03
CO-60	0.00E+00	1.51E+04	1.98E+04	0.00E+00	0.00E+00	8.72E+06	2.59E+05
SR-90	1.08E+08	0.00E+00	6.68E+06	0.00E+00	0.00E+00	1.65E+07	7.65E+05
CS-134	5.03E+05	1.13E+06	5.49E+05	0.00E+00	3.75E+05	1.46E+05	9.76E+03
CS-137	6.71E+05	8.48E+05	3.11E+05	0.00E+00	3.04E+05	1.21E+05	8.48E+03

DOSE FACTOR TABLE: R(i) - Child, inhalation
Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.13E+03	1.13E+03	1.13E+03	1.13E+03	1.13E+03	1.13E+03
FE-55	4.74E+04	2.52E+04	7.77E+03	0.00E+00	0.00E+00	1.11E+05	2.87E+03
CO-60	0.00E+00	1.31E+04	2.27E+04	0.00E+00	0.00E+00	7.07E+06	9.62E+04
SR-90	1.01E+08	0.00E+00	6.44E+06	0.00E+00	0.00E+00	1.48E+07	3.44E+05
CS-134	6.51E+05	1.01E+06	2.25E+05	0.00E+00	3.31E+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

DOSE FACTOR TABLE: R(i) - Infant, inhalation
Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02
FE-55	1.97E+04	1.18E+04	3.33E+03	0.00E+00	0.00E+00	8.70E+04	1.10E+03
CO-60	0.00E+00	8.03E+03	1.18E+04	0.00E+00	0.00E+00	4.51E+06	3.19E+04
SR-90	4.09E+07	0.00E+00	2.59E+06	0.00E+00	0.00E+00	1.12E+07	1.31E+05
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

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

Instrument	Minimum Number of Channels Operable	Action
1. Flow Measurement Devices		
Waste Water Flow Rate and Totalizer (FIRQ95108)	1	With the flow measurement device inoperable, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during temporary tank releases by a level device in the discharge stream.
Temporary Tank Discharge Flow Rate device to be installed prior to release	1	With the flow rate measurement device inoperable, effluent releases via this pathway may continue provided that the temporary tank discharge flow rate is estimated using the Waste Water Flow Rate instrument.

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE
REQUIREMENTS

<u>Instrument</u>	<u>Instrument Channel Check</u>	<u>Instrument Channel Calibration</u>	<u>Channel Test</u>
1 Flow Monitors			
Waste Water Flow Rate and Totalizer (FIRQ95108)	D ⁽¹⁾	R	Q
Temporary Tank Discharge Flow Rate	D ⁽¹⁾	R	Q

Table Notation

- (1) The Instrument Channel Check shall consist of verifying indication of flow during periods of release. The Instrument Channel Check shall be made at least once daily on any day in which batch releases are made.

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity	Lower Limit of Detection (LLD) ^(a) ($\mu\text{Ci/ml}$)
Temporary Tank ^(b,c,d)	Each Batch P	Each Batch P	H-3	1.00 E-05
			Co-60	4.00 E-09
			Cs-134, Cs-137	3.00 E-09
	Each Batch P	Composite ^(e) M	Sr-90	1.00 E-09
			Gross Alpha	1.00 E-07

Table Notation

- (a) 1. The Lower Limits of Detection (LLDs) for the radionuclides presented in this table are the smallest concentrations (expressed in microcuries per milliliter) which are required to be detected, if present, in order to achieve compliance with the limits of Step 6.11.2 (10 CFR 50, Appendix I) and assurance of compliance with the limits of Step 6.11.1 (10 CFR 20, Appendix B, Table 2, Column 2) for a Temporary Tank Discharge.
2. The LLD of a radioanalysis system is that value which will indicate the presence or absence of radioactivity in a sample when the probability of a false positive and of a false negative determination is stated. The probabilities of the false positive and false negative are taken as equal at 0.05. The general equation for estimating the maximum LLD in microcuries per milliliter is given by the following:

$$\text{LLD} = \frac{2.71/t_s + 3.29 \times S_b}{(3.70 \text{ E} + 04)(Y \times E \times V)e^{(-\lambda t_c)}}$$

Where:

- 2.71 = factor to account for Poisson statistics at very low background count rates
- 3.29 = two times the constant used to establish the one sided 0.95 confidence interval
- 3.70 E+04 = disintegrations/second/microcurie
- Y = yield of radiochemical process, i.e., the product of all factors such as emission fraction, chemical yield, etc.
- E = counting efficiency (count/disintegrations)

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM (Continued)

Table Notation (Continued)

- V = sample volume (milliliters)
- λ = the radioactive decay constant for the particular nuclide (seconds⁻¹)
- t_c = the elapsed time from midpoint of collection to the midpoint of counting
- S_b = the standard deviation of the background counting rate
- $$S_b = \left(\frac{B}{t_b t_s} + \frac{B}{t_b^2} \right)^{0.5}$$

Where:

- B = background counts
- t_b = background counting interval (seconds)
- t_s = sample counting interval (seconds)
3. The LLD is defined as an a priori (before the fact) estimate and is not to be calculated for each sample analyzed on an a posteriori (after the fact) basis.
- (b) A batch release is the discharge of liquid wastes of discrete volume from the temporary tank(s).
- (c) A Temporary Tank will be isolated and its contents thoroughly mixed to assure representative sampling.
- (d) Isotopic peaks which are measurable and identifiable from a temporary tank sample analysis shall be reported and included in ODCM evaluations. Nuclides which are not observed in the analysis shall be reported as "less than" the nuclide's a posteriori minimum detectable concentration and shall not be reported as being present. The "less than" results shall be considered "zero" for the purposes of ODCM evaluations; however, if a nuclide is measured and identified at a value less than the Attachment 9 LLD value, it shall be reported and entered in ODCM evaluations.
- (e) A composite sample shall be obtained by mixing liquid aliquot volumes in proportion to the volume of liquid released from each temporary tank.

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>Instrument</u>	<u>Action</u>
1. IOSB Reactor Building	
a. Particulate Sampler	These samples are analyzed in accordance with Attachment 11.
b. Sampler Flow Rate Measurement Device	Only samplers with a calibrated flow-measuring device may be used.

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency ^(b)	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ^(a) (μCi/cc)
Reactor Building	Continuous	M ^(f) Particulate Sample	Principal Gamma Emitters ^(c)	1.00 E-11
	Continuous	M ^(f) Particulate Sample	Gross Alpha ^(e)	1.00 E-11
			Sr-90 ^(d)	1.00 E-11
Grab Sample	M	Tritium (H-3) ^{(f) (g)}	1.00 E-6	
IOSB	Continuous	M ^(f) Particulate Sample	Principal Gamma Emitters ^(c)	1.00 E-11

Table Notation

- (a) 1. The Lower Limits of Detection (LLDs) for the radionuclides presented in this table are the smallest concentration (expressed in microcuries per unit volume) which are required to be detected, if present, in order to achieve compliance with the limits of the Specifications in Steps 6.11.5, and 6.11.6.
2. The LLD of a radioanalysis system is that value which will indicate the presence or absence of radioactivity in a sample when the probability of a false positive and of a false negative determination is stated. The probabilities of the false positive and false negative are taken as equal at 0.05. The general equation for estimating the maximum LLD in microcuries per cubic centimeter (μCi/cc) is given by the following:

$$LLD = \frac{2.71/t_s + 3.29 \times S_b}{(3.70 \text{ E} + 04)(Y \times E \times V)e^{(-\lambda t_c)}}$$

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM
(Continued)

Where:

2.71 = factor to account for Poisson statistics at very low background count rates

3.29 = two times the constant used to establish the one sided 0.95 confidence interval.

3.70 E+04 = disintegrations/second/microcurie

Y = yield of radiochemical process, i.e., the product of all factors such as emission fraction, chemical yield, etc.

E = counting efficiency (count/disintegrations)

V = sample volume (cubic centimeters)

λ = the radioactive decay constant for the particular nuclide (seconds⁻¹)

t_c = the elapsed time from midpoint of collection to the midpoint of counting

S_b = the standard deviation of the background counting rate

$$S_b = \left(\frac{B}{t_b t_s} + \frac{B}{t_b^2} \right)^{0.5}$$

Where:

B = background counts

t_b = background counting interval (seconds)

t_s = sample counting interval (seconds)

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM (Continued)

Table Notation (Continued)

3. The LLD is defined as an a priori (before the fact) estimate and is not to be calculated for each sample analyzed on an a posteriori (after the fact) basis.
 - (b) Sample during Dismantlement activities.
 - (c) Principal gamma emitters for which the LLD applies are: Co-60, Cs-134, and Cs-137 for particulate samples. This does not mean only these nuclides will be detected and reported. Other peaks that are measurable and identifiable shall be reported in the Annual Radioactive Effluent Release Report, pursuant to Step 6.12.1. All peaks, which are measurable and identifiable, shall be reported and entered into the ODCM evaluations. Nuclides, which are not observed for the analysis shall be reported as "less than" the nuclide's a posteriori minimum detectable concentration and shall not be reported as being present. The "less than" results shall be considered "zero" for the ODCM evaluations; however, if a nuclide is measured and identified at a value less than the Attachment 11 LLD value, it shall be reported and entered into ODCM evaluations.
 - (d) A gross beta analysis is performed on a monthly basis for each environmental release particulate sample. If any one of these samples indicates greater than $1.0 \text{ E-}11 \text{ } \mu\text{Ci/cc}$ gross beta activity, then an Sr90 analysis will be performed on those samples exceeding this value.
 - (e) A gross alpha analysis is performed on a monthly basis for each environmental release particulate sample. This fulfills the requirements of performing a monthly composite.
 - (f) Sample during Dismantlement activities.
 - (g) This analysis shall be performed until such time that all plant origin liquid sources of Tritiated water have been eliminated. i.e. Radwaste Tanks have been emptied.

MANUAL: CHEMISTRY ADMINISTRATIVE PROCEDURES
MANUAL
TITLE OFFSITE DOSE CALCULATION MANUAL

NUMBER: CAP-0002
REVISION: 21
PAGE: 50 of 50

ODCM REVISION REVIEW REQUIREMENTS

ODCM REVISION REVIEW REQUIREMENTS

Whenever the ODCM is revised, no matter what the changes are, several reviews must be performed. These reviews must also be documented. The documentation is often included as an attachment to the 50.59 Safety Determination. This form lists the minimum reviews and documentation required for each change. Initial each requirement as it is completed. Sign the bottom of the form when all review requirements are completed.

Initials

I. Determination that the level of control of radioactive effluents is being maintained.

This determination is made by review of the following documents:

- 10 CFR 20.1301 and 20.1302
- 10 CFR 50.36a
- Appendix I to 10 CFR 50
- 40 CFR 190

II. Determination that the change(s) will not adversely affect the accuracy or reliability of effluent dose calculations or effluent monitor setpoint determinations.

This determination is made by directly reviewing each change to the ODCM. Although each change must be evaluated, changes that directly involve calculations should be more carefully considered.

III. Supporting information.

Full justification including analyses and evaluations to support the change(s) must be included in the review and approval package.

IV. Notification of NRC.

The NRC is notified of all changes to the ODCM by including a complete, legible copy as part of, or concurrent with, the Annual Radioactive Effluent Release Report (ARERR). To ensure inclusion in the ARERR a CHM-122 item should be initiated whenever the ODCM is revised.

V. Implementing Documents

The following documents should be reviewed for impact whenever the ODCM is revised:

- CAP-0008, Offsite Releases of Radioactivity in Liquid Effluents
- CAP-0009, Offsite Releases of Radioactivity in Liquid Effluents
- CAP-0013, Preparation of the Annual Radioactive Effluent Release Report
- CHM-5107, Compositing of Liquid Samples
- CHM-5109, Effluent Monitor Alarm Response Procedure

VI. Multidiscipline Review

Ensure all areas that may be affected by the revision, or have an interest in the changes made in the revision, are included in the multidiscipline review. Areas that are affected by the ODCM and could be included in this review are: Technical Services, Surveillance Scheduler, Quality Assurance, Licensing, and Operations.

All Reviews Complete: _____
Reviewer Signature Date

CHM-122 (Rev. 0)

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RSNGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
JANUARY - DECEMBER 2008

ATTACHMENT 2

MANUAL:	CHEMISTRY ADMINISTRATIVE PROCEDURES MANUAL	NUMBER: CAP-0002 REVISION: 22
TITLE	OFFSITE DOSE CALCULATION MANUAL	PAGE: 1 of 49
LEAD DEPARTMENT:	RP/ Chemistry	EFFECTIVE DATE: 7/8/2008

SCOPE OF REVISION:

1. Deleted Section 2.1 from Scope which indicated Rancho Seco does not currently have a liquid effluent pathway.
2. Deleted references 3.2.20 and 3.2.21, they are no longer applicable.
3. Section 4.14, redefined Ventilation Exhaust Treatment System.
4. Section 6.4.1, deleted Reactor Building flow rate.
5. Section 6.11.7, deleted statement that the Ventilation Exhaust Treatment System is sampled during Dismantlement Activities.
6. Attachment 11, revised sampling requirements for the Reactor Building to reflect reclassification of the Reactor Building to a Miscellaneous Release point.

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1.0 PURPOSE

The Off-site Dose Calculation Manual (ODCM) contains the methodology and parameters used in the calculation of off-site doses due to radioactive gaseous and liquid effluents. . Methods are described for assessing compliance with the Technical Requirements in the ODCM as they apply to 10 CFR Parts 20.1301 and 20.1302, 10 CFR Part 50, Appendix I, 10 CFR 50.36a, and 40 CFR 190.10a for liquid and gaseous effluents. Additionally, the ODCM contains the Technical Requirements, which provide the Specifications, Applicability's, Actions, and Surveillance Requirements.

2.0 SCOPE

This procedure functions as a manual that provides the basis for development of detailed implementing procedures that address dose calculations for liquid/ gaseous releases. Additionally, this manual provides the Technical Requirements that govern releases of liquid and gaseous radioactive releases off-site.

3.0 REFERENCES/COMMITMENT DOCUMENTS

3.1 Commitment Documents

- 3.1.1 Code of Federal Regulations, Title 10, Chapter 1, Parts 20, 50.36a and Part 50, Appendix I
- 3.1.2 Rancho Seco Quality Manual (RSQM)
- 3.1.3 EPA 40 CFR Parts 302, 355 Reporting Requirements
- 3.1.4 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Plant Operations

3.2 Reference Documents

- 3.2.1 USNRC Regulatory Guide 1.109, Rev. 1, 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
- 3.2.2 W. C. Burke, et. al., Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants, NUREG-0133, USNRC: NRR, October 1978
- 3.2.3 ORNL, User's Manual for LADTAP II, NUREG/CR-1276, May 1980
- 3.2.4 D. L. Strange, et. al., LADTAP-II, Technical Reference and User Guide, NUREG/CR-4013, Pacific Northwest Laboratory, April 1986
- 3.2.5 Eckerman, K. F., et. al., User's Guide to GASPAR Code, NUREG-0597, USNRC: NRR, June 1980, in RSIC CCC-463

- 3.2.6 USNRC Regulatory Guide 1.111, Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors
- 3.2.7 USNRC 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
- 3.2.8 USNRC Regulatory Guide 4.1, Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants
- 3.2.9 REIMS Software Life Cycle Documents (Software Requirement Specification, Design Document, Acceptance Test Plan)
- 3.2.10 USNRC & Pacific Northwest Laboratory, TDMC Computer Code/Data Collections, XOQDOQ-82, Radiological Assessment Code System Meteorological Evaluation of Routine Effluent Releases at Nuclear Power Stations
- 3.2.11 2006 Rancho Seco Biennial Land Use Census
- 3.2.12 RSNCS DSAR Chapters 11.1-11.5
- 3.2.13 RSNCS P&ID Drawing M-563, M-551, M-552
- 3.2.14 Pacific Northwest Laboratory, XOQDOQ: Computer Program for the Meteorological Evaluation of Routine Effluent Releases at Nuclear Power Stations
- 3.2.15 Congel, F. J., Methods for Demonstrating LWR Compliance with the EPA Uranium Fuel Cycle Standard (40 CFR Part 190), NUREG-0543, USNRC: NRR, February 1980
- 3.2.16 USNRC Generic Letter, 89-01, Dated January 31, 1989.
- 3.2.17 Rancho Seco REMP Manual
- 3.2.18 PDQ 92-063
- 3.2.19 RP.312.I.14, Occupational Radiation Exposure Limits and Extensions

4.0 DEFINITIONS

4.1 Member of the Public

Means any individual except when that individual is receiving an occupational dose.

4.2 Occupational Dose

Means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation and/or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person. Occupational dose does not include dose received from background radiation, as a patient from medical practices, from voluntary participation in medical research programs, or as a member of the public.

4.3 Public Dose

Means the dose received by a Member of the Public from exposure to radiation and/or radioactive material released by a licensee, or to any other source of radiation under the control of a licensee. It does not include occupational dose or doses received from background radiation, as a patient from medical practices, or from voluntary participation in medical research programs.

4.4 Batch Release:

Liquid Batch Release is a transfer of a discrete volume of radioactive liquid from a temporary tank to the Waste Water discharge canal (the Environmental Release Point).

A Gaseous Release is the discharge of gaseous radioactive wastes that consist of tritium and/or radionuclides in particulate form.

4.5 Continuous Release

A continuous radioactive gaseous release is the discharge of gaseous waste during dismantlement activities.

Continuous radioactive liquid releases are not planned to be made from Rancho Seco Nuclear Generating Station (RSNGS).

4.6 Dilution Flow

The volume or volume rate of fluid (liquid), which is added to a radiological release stream for the purpose of decreasing the concentration of the stream.

4.7 Maximum Exposed (Hypothetical) Individual

The Maximum Exposed Individual is characterized as "maximum" with regard to food consumption, occupancy, and other usage or exposure pathway parameters in the vicinity of Rancho Seco that would represent an individual with habits greater than usually expected for the average of the population in general.

Maximum dose factor parameters will be determined using site-specific data from the Biennial Land Use Census. If information needed to determine a parameter is not available, RG 1.109 parameters will be used. All dose factor parameters used are listed in Attachment 1.

4.8 RSNGS

Rancho Seco Nuclear Generating Station

4.9 Site Boundaries

The Site Boundaries are defined by the drawings in Attachments 3 and 4.

4.10 Nuisance Pathways

- (1) Secondary system gaseous pathways where the calculated dose totals contribute less than 5% of the annual limits and do not need to be tracked for dose calculational purposes unless secondary activity reaches a predetermined Action Level.
- (2) Sources of trace levels of radioactivity in liquid effluents where the calculated dose totals contribute less than 1% of the annual limits and do not need to be tracked for dose calculational purposes. Trace levels are defined to be less than $1E-8 \mu\text{Ci/ml}$ for the nuclides typically released from RSNGS. Examples include the plant effluent inlet, and storm drains.

4.11 Unplanned Release

The unexpected release of radioactive materials to unrestricted areas in gaseous and liquid effluent. All unplanned releases shall be discussed in the Annual Radiological Effluent Release Report (ARERR) to the NRC.

4.12 Miscellaneous Release

Release pathways, which are considered planned but are not defined explicitly with monitoring requirements in this procedure. These pathways contribute a relatively small percentage (<5%) to the annual dose limits but shall be tracked for effluent activity accounting and dose calculation purposes. Miscellaneous releases shall not be reported in the ARERR as abnormal or unplanned releases. The Reactor Building and IOS Building are Miscellaneous Releases.

4.13 Safety Factor (SF)

A number greater than unity used in calculations to introduce greater conservatism (larger margin of safety) to offset various uncertainties in instrumentation and methods. Radiation Protection/Chemistry Supervision based on either analysis or professional judgment sets safety factors. Unless otherwise specified, the default value is two (2).

4.14 Ventilation Exhaust Treatment System (VETS)

Engineering controls used to reduce radioactive materials locally prior to release to the environment.

4.15 Instrument Surveillance

(1) Source Check

A source check is the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

(2) Channel Test

A channel test is the injection of an internal or external test signal into the channel to verify its proper response, including alarm and/or trip initiating action, where applicable.

(3) Instrument Channel Check

An instrument channel check is a verification of acceptable instrument performance by observation of its behavior and/or state; this verification includes comparison of output and/or state of independent channels measuring the same variable.

(4) Instrument Channel Calibration

An instrument channel calibration is a test, and adjustment (if necessary), to establish that the channel output responds with acceptable range and accuracy to known values of the parameter, which the channel measures, or an accurate simulation of these values. Calibration shall encompass the entire channel, including equipment actuation, alarm, or trip and shall be deemed to include the channel test.

4.16 Surveillance Intervals

The Surveillance Interval may be extended to a maximum of +25% to accommodate operations scheduling. The frequency notation (which follows the name of the Surveillance Interval in parenthesis) specified for the performance of Surveillance Requirements shall correspond to the Surveillance Intervals defined below.

- (1) Shift (S): A time period covering at least once per twelve (12) hours.
- (2) Daily (D): A time period spaced to occur at least once per twenty four (24) hours.
- (3) Weekly (W): A time period spaced to occur at least once per seven (7) days.
- (4) Monthly (M): A time period spaced to occur at least once per thirty one (31) days.
- (5) Quarterly (Q): A time period spaced to occur at least once per ninety two (92) days.
- (6) Semiannually (SA): A time period spaced to occur at least once per six (6) months.
- (7) Annually (A): A time period spaced to occur at least once per twelve (12) months.
- (8) Refueling Interval (R): A time period spaced to occur at least once per eighteen (18) months.
- (9) Each Release (P): This surveillance will be completed prior to each release.

4.17 Radiological Effluent Information Management System (REIMS)

The computer software and database that tracks the volume and activity of released radioactive effluents. In addition, the software provides the basis for the permitting process, calculates dose to man, and summarizes data for inclusion into the ARERR.

4.18 Operable/ Operability

A component or system is Operable when it is capable of performing its intended function within the required range. The component or system shall be considered to have this capability when: (1) it satisfies the Specifications in Section 6.11, (2) it has been tested periodically in accordance with the Surveillance Requirement in Section 6.11 and has met its performance requirements, (3) the system has available its source of power, and (4) its required auxiliaries are maintained available and capable of performing their intended function.

5.0 RESPONSIBILITIES

5.1 Radiation Protection/Chemistry Superintendent

It is the responsibility of the Radiation Protection/Chemistry Superintendent for the following:

- 1) ODCM Revisions and Reporting the Revisions in the Annual Radioactive Effluent Release Report (ARERR)
- 2) ARERR Preparation and Submittal
- 3) REIMS Database
- 4) LADTAP, GASPAR, and XOQDOQ Computer Program Verifications and Changes

5.2 Commitment Management Review Group (CMRG)

The CMRG is responsible for reviewing and accepting all changes to the ODCM with approval by the Plant Manager per the Rancho Seco Quality Manual.

6.0 PROCEDURE

6.1 General Considerations

6.1.1 Liquid Effluent Pathways

The liquid effluent discharge of RSNRS forms the headwaters of Clay Creek.

Dilution of the liquid effluent occurs off-site in the seasonal creek (No Name Creek) just downstream of the Plant Outfall, which then joins Clay and Hadselville Creeks, and of Hadselville and Laguna Creeks, and at the confluence of Laguna Creek and the Cosumnes River.

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Planned radioactive liquid releases (if necessary) will be directed through temporary tanks and piping to give reasonable assurance of compliance with 10 CFR 50 Appendix I prior to their discharge. Prior to discharge from the temporary system to the plant effluent (off-site), the discharge rate from the temporary system and the amount of dilution from Folsom South Canal are controlled to ensure compliance with the concentration requirements in 10 CFR 20.

6.1.2 Gaseous Effluent Pathways

The Reactor Building and Interim On-site Storage (IOS) Building are Miscellaneous Releases. Unplanned Releases shall be evaluated on a case-by-case basis.

6.1.3 Meteorological Data

The atmospheric dispersion (X/Q) and deposition (D/Q) factors used in calculations involving airborne effluent are conservative default values. The default X/Q value is $1.0E-4$ sec/m³, and the default D/Q value is $1.0E-6$ m⁻². These factors should be used to determine monitor set points, assess compliance with the gaseous effluent requirements in Section 6.11, and calculate the gaseous effluent dose reported in the ARERR. Attachment 2 shows actual dispersion and deposition factors and is presented for historical information only.

6.1.4 Boundaries

The Site Boundary for Gaseous Effluents as shown in Attachment 3 is for all calculations involving gaseous effluents. The Site Boundary for Liquid Effluents as shown in Attachment 4 is for all calculations involving liquid effluents.

6.1.5 40 CFR 190 Compliance

For the purposes of assessing compliance with 40 CFR 190, the MEMBER OF THE PUBLIC which received the most exposure may be determined using actual food consumption, actual occupancy rates, and dilution off-site from additional converging streams (verses assumptions used for a HYPOTHETICAL MAXIMUM EXPOSED INDIVIDUAL based on Biennial Land Use Census data).

6.1.6 Computers vs. Manual Calculations

Computer systems such as REIMS should be used for calculations in order to minimize error and hasten the release process. However, in the event computers are not available for calculations, manual pre-release calculations should be done based on the most historically restrictive receptor.

6.2 Maximum Effluent Concentrations in Liquid Effluents

The Maximum Effluent Concentration Fraction is calculated to determine compliance with 10 CFR 20 requirements and the Specification in Step 6.11.1. Radioactive liquid effluent discharges normally originate in onsite temporary tank. Samples are collected and analyzed from each temporary tank prior to discharge to ensure that compliance with the Specification in Step 6.11.1 can be achieved.

In addition, calculations to determine the minimum dilution water flow rate and maximum temporary tank discharge flow rate to ensure compliance are provided in this section. Any combination of minimum dilution flow rate and maximum discharge flow rate, which satisfy the Specification, is acceptable.

6.2.1 Maximum Effluent Concentration Fraction (MECF)

Compliance with the Specification in Step 6.11.1 is anticipated when the MECF is less than or equal to 1.0. The MECF is calculated as follows:

$$\text{MECF} = \left[\sum_i \left(\frac{C_i}{\text{MEC}_i} \right) \right] \times \frac{F_r}{F_c + F_r}$$

Where:

- MECF = The calculated fraction of Maximum Effluent Concentration in the radioactive liquid effluent discharged beyond the Site Boundary for Liquid Effluents (see Attachment 4).
- C_i = The concentration (prior to dilution) of radionuclide i in the batch of liquid effluent in $\mu\text{Ci/ml}$.
- MEC_i = The MEC of radionuclide i from Appendix B to 10 CFR Part 20, Table 2, Column 2, in $\mu\text{Ci/ml}$. The class with the most restrictive Effluent Concentration will be used for each isotope.
- F_r = Discharge flow rate; the flow rate of the radioactive liquid batch release from the temporary tank to the Waste Water Discharge Canal (Plant Effluent) in gpm.
- F_c = The total available dilution water (Plant Effluent) flow rate at the time of discharge of the radioactive liquid effluent in gpm.

6.2.2 Minimum Dilution Water Flow Rate (F_{min})

The minimum dilution water (Plant Effluent) flow rate (F_{min}) is calculated as follows:

$$F_{\text{min}} = F_r \times \left[\left(SF \times \sum_i \left\{ \frac{C_i}{MEC_i} \right\} \right) - 1 \right]$$

NOTE

$SF \times \sum_i (C_i/MEC_i)$ must be ≥ 1.0

Where:

F_r = A fixed effluent discharge flow (gpm) (as required by specific release restrictions).

SF = A factor which may be applied to incorporate a margin of conservatism ($SF \geq 1$).

6.2.3 Maximum Effluent Discharge Flow Rate (F_{max})

The maximum effluent discharge flow rate (F_{max}) is calculated as follows:

$$F_{\text{max}} = \frac{F_c}{\left[SF \times \sum_i \left(\frac{C_i}{MEC_i} \right) \right] - 1}$$

Where:

F_c = A fixed dilution water flow rate (gpm) (as required by specific release restrictions).

NOTE

$SF \times \sum_i (C_i/MEC_i)$ must be ≥ 1

6.3 Liquid Dose Calculations

This section provides the methodology to demonstrate compliance with the Specification in Step 6.11.2.

Site-specific organ dose factors for liquid effluents have been determined for the MAXIMUM EXPOSED INDIVIDUAL and are listed in Attachment 5. Dose factors (A_{ijap}) were derived using equations and methods in Regulatory Guide 1.109, Rev. 1 and LADTAP. The dose factor parameters used are listed in Attachment 1. As previously stated, site specific parameters should be used based on the Biennial Land Use Census in lieu of the values provided in RG 1.109 whenever possible.

The exposure pathways included in the A_{ijap} are those identified by the Biennial Land Use Census. The pathways considered for inclusion are:

- Fresh water fish
- Fresh water invertebrate
- River shoreline deposits
- Milk from cows that eat fresh or stored forage irrigated with Clay Creek water
- Meat from cows that eat fresh or stored forage irrigated with Clay Creek water
- Vegetation

6.3.1 Liquid Effluent Dose Equation

$$D_{aj} = \frac{\sum_i \sum_p (Q_i \times A_{ijap})}{F}$$

Where:

D_{aj} = Annual calculated dose (50 year dose commitment) to the organ (or total body) j of a maximally exposed individual of age group a (mrem/yr).

Q_i = Activity of isotope i released during the year (Ci/yr).

A_{ijap} = Site-specific dose factor for an organ (or total body) j for a person of age group a via pathway p due to isotope i (mrem-ft³/Ci-sec).

F = Annual average discharge volumetric flow rate (effluent water plus dilution water) in ft³/sec.

Because the dose rate varies linearly with activity release rate, the dose for a shorter period of time (mrem) may be calculated by substituting the activity released (C_i) during that period for Q_i in the above equation. However, volumetric flow rates should not be averaged over a period less than a calendar quarter. More conservative flow rates are acceptable.

6.4 Liquid Dose Projections

31-day dose projections are calculated to show compliance with the Specification in Step 6.11.3 Quarterly and Annual dose projections are calculated in compliance with the Specification in Step 6.11.9.

The following equations shall be used:

31-Day Projection:

$$D_{p31} = 31 \times \frac{D_{Yr}}{t_{Yr}}$$

Quarterly Projection:

$$D_{pQtr} = 91.3 \times \frac{D_{Qtr}}{t_{Qtr}}$$

Yearly Projection:

$$D_{pYr} = 365.25 \times \frac{D_{Yr}}{t_{Yr}}$$

Where:

- D_{p31} = 31-day dose projection.
- D_{Yr} = Cumulative annual dose to date.
- t_{Yr} = Number of days into the year.
- D_{pQtr} = Quarterly dose projection.
- D_{Qtr} = Cumulative quarterly dose to date.
- t_{Qtr} = Number of days into the quarter.
- D_{pYr} = Annual dose projection.

6.4.1 Gaseous Effluent Flow Rates

Flow rates used in routine gaseous effluent calculations for the pathways listed below are conservative default values. These flow rates should be used to determine monitor set points, assess compliance with the gaseous effluent requirements in Section 6.11, and calculate the gaseous effluent dose reported in the ARERR.

Gaseous effluent release points and maximum design flow rates used at RSNGS are as follows:

Reactor Building Exhaust	34000 CFM
Interim On-site Storage Building Ventilation*	8,050 CFM

*The Interim On-site Storage (IOS) Building is not subject to continuous discharges of radioactivity. Because of the infrequency of a radioactive release, assessment will be done on each release according to administrative procedures.

6.5 Maximum Effluent Concentrations (MECs) in Gaseous Effluents

In order to demonstrate compliance with 10 CFR 20.1301, which requires that the total MEC fraction not exceed 1 when averaged over an entire year, the calculation is included in the Annual Radioactive Effluent Release Report. In addition, a four hour reporting requirement exists when the total MEC fraction exceeds 20 when averaged over one hour per 10 CFR 50.72. The following provides guidance on how to perform this calculation.

Maximum Effluent Concentration Fraction (MECF) Equation

$$MECF = \sum_i \left(\frac{C_i}{MEC_i} \right) \times F \times 4.72E-4 \times X/Q \times TR$$

Where:

- C_i = The concentration of nuclide i in mCi/cc.
- F = Maximum design volumetric flow rate in CFM as indicated in 6.5.1.
- X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m^3 . The default value in Step 6.1.3 will be used.
- MEC_i = The MEC for nuclide i from Appendix B to 10 CFR Part 20, Table 2, Column 2 ($\mu\text{Ci}/\text{cc}$). The class with the most restrictive Effluent Concentration will be used for each isotope.
- TR = If the time of release is less than one hour, then this value is the duration of the transient in minutes divided by sixty. Otherwise, the Time Ratio (TR) is one. Dimensionless.
- $4.72E-4$ = The conversion factor in $\text{min} \cdot \text{m}^3 / \text{sec} \cdot \text{ft}^3$.

6.6 Dose Rate Calculations

The Specification in Step 6.11.5 provides a maximum limit on organ dose rate equivalent beyond the Site Boundary for Gaseous Effluents from tritium and all radioactive materials in particulate form with half-lives greater than 8 days. Compliance is determined by calculating the organ dose rate for the MAXIMUM EXPOSED INDIVIDUAL for the inhalation pathway only.

The organ dose rate resulting from inhalation is calculated with the equation:

Organ:

$$DO_{aj} = (X/Q) \times \sum_v \sum_i (Q_{vi} \times R_{aji})$$

Where:

- DO_{aj} = The dose commitment rate to organ *j* of a person in age group *a* (mrem/yr)
- R_{aji} = The factor to convert air concentration of radionuclide *i* to organ *j* dose commitment rate of a person in age group *a* exposed by inhalation (mrem-m³/μCi-yr). See Attachment 7.
- Q_{vi} = The release rate of radionuclide *i* (not including Noble Gas nuclides), via effluent vent *v* during the time of the release (μCi/sec)
- X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m³. The default value in Step 6.1.3 will be used.

Exposure to dose rate factors, R_{aji} , for using equation 13 in RG 1.109, Rev. 1, derives inhalation. Tables E-5, E-7, E-8, E-9, and E-10 are assumed to represent the Maximum Exposed Individual in the equation to derive R_{aji} .

6.7 Organ Dose Calculations for Gaseous Effluents

The Surveillance Requirement in Step 6.11.6 requires the radiation dose or dose commitment to the Maximum Exposed (Hypothetical) Individual accumulated from exposure to tritium and radioactive materials in particulate form having half-lives greater than 8.0 days, that originate in effluent air, be determined at least every month. The radiation dose or dose commitment accumulated during a calendar quarter and a year may not exceed values stated in the Specification in Step 6.11.6.

A person may be exposed to effluent radioactive material of this type in air by inhalation or indirectly via environmental pathways that involve deposition onto vegetation and the ground. The exposure pathways evaluated will include the following:

p	Exposure Pathway
1	Air – inhalation
2	Deposition onto ground - irradiation
3	Deposition onto vegetation - ingestion
4	Deposition onto forage - cow - milk - ingestion
5	Deposition onto forage - meat animal - meat - ingestion
6	Deposition onto forage - goat - milk - ingestion

The equation used to calculate the dose commitment to the Maximum Exposed (Hypothetical) Individual from radionuclides other than tritium is:

$$D_{aj} = \sum_{p=1} \left[(X/Q)_p \times \sum_v \sum_i (Q_{vi} \times R_{ajip}) \right] + \sum_{p=2}^6 \left[(D/Q)_p \times \sum_v \sum_i (Q_{vi} \times R_{ajip}) \right]$$

Where:

p = 1, i.e., air-inhalation, in the first term, and p = 2, 3, 4, 5, and 6 in the second term of the equation excludes H-3.

D_{aj} = The dose commitment to organ *j* of a person in age group *a* (mrem)

Q_{vi} = The quantity of each radionuclide *i*, in particulate form having a half-life greater than 8.0 days, in air discharged via effluent stream *v* (μ Ci)

X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m^3 . The default value in Step 6.1.3 will be used.

D/Q = A conservative default deposition factor. A Factor converting a ground-level or building wake discharge in air to deposition on land (m^2). The D/Q value in Step 6.1.3 will be used.

R_{ajip} = A factor converting time integrated concentration of radionuclide *i* in air or deposited on vegetation and/or ground to radiation dose commitment to organ *j*, including total body, of a person in age group *a* who is exposed via pathway *p*.

When p = 1, representing air-inhalation, R_{ajip} has units of $\text{mrem}\cdot\text{m}^3/\mu\text{Ci}\cdot\text{yr}$. When p=2, 3, 4, 5 or 6 in the second term of the equation above, representing pathways involving deposition, R_{ajip} has units of $\text{mrem}\cdot\text{m}^2\cdot\text{sec}/\text{yr}\cdot\mu\text{Ci}$. When the radionuclide is H-3, R_{ajip} has units of $\text{mrem}\cdot\text{m}^3/\mu\text{Ci}\cdot\text{yr}$.

Tritium is assumed not to deposit onto vegetation or the ground. Hence, the concentration in vegetation is assumed to be related to the local atmospheric concentration as described in RG 1.109, Rev. 1, Appendix C. The dose commitment to the Maximum Exposed (Hypothetical) Individual from tritium in gaseous effluent is calculated with the equation:

$$D_{aj} = 3.17E-8 \times \sum_p \left[(X/Q)_p \times \sum_v (Q_{vi} \times R_{ajip}) \right]$$

Where:

p = 1, 3, 4, 5, and 6

i includes H-3 only

X/Q = A conservative default atmospheric dispersion factor for a ground level release to a sector at or beyond the Site Boundary for Gaseous Effluents in sec/m³. The default value in Step 6.1.3 will be used.

3.17E-8 = years/sec

Other terms as defined in previous section.

Dose factors R_{ajip} for RSNRS are derived using the equations and methods in RG 1.109, Rev. 1, Appendix C. Values of parameters in RG 1.109, Rev. 1, Table E-5 are assumed to represent the Maximum Exposed (Hypothetical) Individual unless Land Use Census data justify a different value. Any different values from default values will be justified and added as a table to the ODCM. Values of other parameters recommended in RG 1.109, Rev. 1, including those recommended in the absence of site-specific data, are used in the equations to derive the dose factors. (GASPAR or REIMS may be used to perform the calculations.)

6.8 Gas Dose Projections

31-Day Dose projections are calculated to show compliance with Step 6.11.9. Quarterly and Annual dose projections are calculated in compliance with the Specification in Step 6.11.9. The dose projection equations are the same as used for liquid per Step 6.4.

6.9 Fuel Cycle Dose

If a calculated dose exceeds twice the limit of the Specification in Step 6.11.2 and 6.11.6 or a level in Table 3 of the REMP Manual is exceeded, an assessment of compliance with the Specification in Step 6.11.8 must be made.

Liquid dose calculations shall be made using the general methodology of Step 6.4. Gas dose calculations shall be made using the general methodology of Steps 6.4 and 6.7. These methodologies are to be used as a guide and strict adherence is not required because the Fuel Cycle Dose Calculation is done to determine the actual dose received, not a hypothetical maximum. Therefore, parameters such as dilution beyond the site boundary and residential shielding may be factored into the calculation.

The total body and organ doses shall be the result of summing the individual contributions from liquid, gas, and direct radiation sources for the affected Member of the Public.

Irradiation, i.e., exposure to an external source of radiation, directly from the RSNRS normally will be evaluated with the aid of environmental monitoring dosimetry.

6.10 EPA Reporting Requirements

If a calculated dose exceeds the Specification limit of Step 6.11.1, 6.11.2, 6.11.5, or 6.11.6, an assessment of compliance with 40 CFR Parts 302 and 355, Reportable Quantity Adjustment - Radionuclides, must be made.

This involves determining the maximum quantity of radionuclides released in a 24 hour period and comparing the quantities to the values listed in 40 CFR 302 Appendix B. The "sum of the ratios" method shall be used to determine compliance. If the "sum of the ratios" is greater than one, the National Response Center shall be notified.

Since Rancho Seco's systems and procedures are set up to normally operate within the above limits, this condition is not expected to occur, therefore, specific implementation procedures to determine compliance are not required.

6.11 Technical Requirements

6.11.1 Maximum Effluent Concentrations in Liquid Effluents

Specifications:

The concentration of radioactive material released in liquid effluents at any time beyond the Site Boundary for Liquid Effluents (see Attachment 4) shall be limited to the concentrations specified in Appendix B to 10 CFR Part 20, Table 2, Column 2.

Applicability:

This is applicable at all times.

Action:

With the concentration of radioactive material released from the site to areas beyond the Site Boundary for Liquid Effluents exceeding the above Specifications, immediately restore concentration within the required limits and report the event in the next Annual Radioactive Effluent Release Report.

Surveillance Requirements:

The radioactivity concentration of each temporary tank to be discharged shall be determined prior to release by sampling and analysis in accordance with Attachment 9. The results of the temporary tank pre-release sample analyses shall be used with the calculational methods described in Step 6.2 to ensure that the concentration at the point of release is within the limits of the above Specification.

Bases:

This Specification is provided to ensure that the concentration of radioactive materials released in liquid waste effluents from the site to areas beyond the Site Boundary For Liquid Effluents (see Attachment 4) will be less than the concentration levels specified in Appendix B to 10 CFR Part 20, Table 2, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water outside the site will result in exposures within the limits of 10 CFR Part 20.1301 to a MEMBER OF THE PUBLIC.

There are no continuous releases of radioactive material in liquid effluents from the plant. All radioactive liquid effluent releases from the plant are by batch method.

6.11.2 Liquid Dose Calculations

Specifications:

The dose or dose commitment to a MAXIMUM EXPOSED (HYPOTHETICAL) INDIVIDUAL from radioactive materials in liquid effluents released beyond the Site Boundary for Liquid Effluents (see Attachment 4) shall be limited to:

- 1) Less than or equal to 1.5 mrem to the total body and to less than or equal to 5.0 mrem to any organ during any calendar quarter; and,
- 2) Less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ during any calendar year.

Applicability:

At all times.

Action:

With the calculated dose or dose commitment from the release of radioactive materials in liquid effluents exceeding any of the above Specifications, prepare and submit to the Commission within 30 days a Special Report. This Report will identify the cause(s) for exceeding the limit(s) and define the corrective actions to be taken to reduce the releases of radioactive material in liquid effluents and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above Specifications.

Surveillance Requirements:

Cumulative dose assessments associated with the release of radioactive liquid effluent shall be determined by sampling and analysis in accordance with Attachment 9, and calculations performed in accordance with the methodology described in Step 6.4 at the following frequencies:

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- 1) Prior to the initiation of a release of radioactive liquid effluent from the temporary tank(s); and,
- 2) Upon verification of monthly composite analysis results for radioactive liquid effluent released from the temporary tank(s).

A dose tracking system and administrative dose limits shall be established and maintained. With the 31-day dose projection in excess of the limits in Step 6.11.2, adjust liquid effluent operating parameters to give reasonable assurance of compliance with the dose limits of this Specification (10 CFR 50, Appendix I dose guidelines) and maintain radioactive liquid releases as low as is reasonably achievable.

Bases:

ODCM Step 6.11.2 is provided to implement the requirements of Sections II.A, III.A, and IV.A of Appendix I, 10 CFR Part 50. This step implements the guides set forth in Section II.A of 10 CFR 50, 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 10 CFR 50, Appendix I to assure that the releases of radioactive material in liquid effluents will be kept "as low as is reasonably achievable." The dose calculation methodology in this manual implement the requirements in Section III.A of 10 CFR 50, Appendix I that conformance with the guides of 10 CFR 50, Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of an individual through appropriate pathways is unlikely to be substantially underestimated.

The equations specified in this manual 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. There is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in finished drinking water that are in excess of the requirements of 40 CFR 141.

The Lower Limits of Detection established in Attachment 9 are based on an estimated maximum annual effluent outflow of 2 million gallons with a minimum annual average flow rate in the plant effluent stream of 6,000 gallons per minute. The temporary tank pre-release and monthly composite Lower Limits of Detection equate to an off-site dose of less than 10 percent of the 10 CFR 50, Appendix I guidelines. These Lower Limits of Detection, along with the dose tracking system, give reasonable assurance that the dose limits prescribed in ODCM Step 6.11.2 (the 10 CFR 50, Appendix I dose guidelines) will be met.

6.11.3 Radioactive Liquid Effluent Treatment

Specifications:

A radioactive liquid effluent treatment process shall be used to reduce the quantity of radioactive materials in liquid effluent prior to their discharge when projected doses due to the liquid effluent beyond the Site Boundary for Liquid Effluents (see Attachment 4), when averaged over 31 days, would exceed 0.25 mrem to the total body or 0.83 mrem to any organ (8.33% of the 10 CFR 50, Appendix I annual guidelines).

Applicability:

At all times.

Action:

With radioactive liquid 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:

- 1) Explanation of why liquid Radwaste was being discharged without treatment,
- 2) Action(s) taken to restore treatment capability and,
- 3) Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements:

Doses due to liquid releases to areas beyond the Site Boundary for Liquid Effluents shall be projected prior to each temporary tank release in accordance with the methodology described in Step 6.4.

Bases:

The liquid effluent source term and time constraints for releases have been significantly reduced with the current plant configuration. Use of a radioactive liquid effluent treatment process whenever liquid effluent requires treatment prior to release to the environment, provides reasonable assurance that the releases of radioactive materials in liquid effluent are maintained "as low as is reasonably achievable." This specification implements the requirements of 10 CFR Part 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 50. The specified dose limits are the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

6.11.4 Gaseous Effluent Monitoring

Instrumentation requirements for gaseous effluent monitoring are presented in Attachment 10.

The Reactor Building and IOS Building have ventilation systems in which the effluent releases are sampled during work events that generate airborne particulate activity. Operation of the respective ventilation systems produces a negative pressure in the buildings. Although no planned airborne radioactive releases are anticipated from these pathways, refer to Attachment 11 when sampling the ventilation exhaust from these buildings.

6.11.5 Gaseous Dose Rates

Specifications:

The dose rate due to radioactive materials released in gaseous effluents from the site to areas at or beyond the Site Boundary for Gaseous Effluents (see Attachment 3) shall be limited to the following values:

- 1) The dose rate limit for tritium and for all radioactive materials in particulate form with half-lives greater than 8 days shall be less than or equal to 1500 mrem/yr to any organ.

Applicability:

This is applicable at all times.

Action:

With the dose rate(s) exceeding the above limits, immediately restore the release rate to within the limit(s) specified and report the event in the next Annual Radioactive Effluent Release Report.

Surveillance Requirements:

Obtaining representative samples and performing analyses in accordance with the sample analyses program specified in Attachment 11 shall determine the release rate of radioactive materials in gaseous effluents.

The dose rate due to tritium and all radioactive material in particulate form with half-lives greater than 8 days, released in gaseous effluents, shall be determined to be within the limits of this Specification by using the results of the sampling and analysis program specified in Attachment 11 and the methodology described in Step 0.

Bases:

Step 6.11.5 is provided to ensure that the dose rate from gaseous effluents due to inhalation at any time at the Site Boundary for Gaseous Effluents (see Attachment 3) will be within the annual dose limits of 10 CFR Part 20 for MEMBERS OF THE PUBLIC. The annual dose limits are the doses associated with the concentrations of Appendix B to 10 CFR Part 20, Table 2, Column 1. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of an individual at or beyond the Site Boundary for Gaseous Effluents to annual average concentrations exceeding the dose rate equivalent, on which the limits specified in Appendix B, Table 2 of 10 CFR Part 20 were derived. For individuals who may at times be within the Site Boundary for Gaseous Effluents, the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the boundary.

6.11.6 Gaseous Organ Dose

Specifications:

The dose or dose commitment to a MAXIMUM EXPOSED (HYPOTHETICAL) INDIVIDUAL from tritium and radioactive materials in particulate form with half-lives greater than eight days in gaseous effluents released to areas at or beyond the Site Boundary for Gaseous Effluents (see Attachment 3) shall be limited to the following:

- 1) During any calendar quarter, to less than or equal to 7.5 mrem to any organ; and,
- 2) During any calendar year, to less than or equal to 15 mrem to any organ.

Applicability:

This is applicable at all times.

Action:

With the calculated dose or dose commitment from the release of tritium and radioactive materials in particulate form with half-lives greater than eight days in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days a Special Report. This Report will identify the cause(s) for exceeding the limit and define the corrective actions to be taken to reduce the releases and the proposed corrective action(s) to be taken to assure that subsequent releases will be in compliance with the above annual limits.

Surveillance Requirements:

Cumulative dose contributions for the current calendar quarter and calendar year period shall be determined in accordance with the methodology described in Step 6.7 at least monthly.

Bases:

Step 6.11.5 is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Specifications are the guides set forth in Section II.C of 10 CFR 50, 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 10 CFR 50, Appendix I to assure that the releases of radioactive materials in gaseous effluents will be kept "As Low As is Reasonably Achievable (ALARA)." The calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of 10 CFR 50, Appendix I that conformance with the guides of 10 CFR 50, Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of an individual through appropriate pathways is unlikely to be substantially underestimated. For individuals who may at times be within the Site Boundary for Gaseous Effluents, the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric dispersion factor above that for the boundary.

The calculational methods 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, "Calculating 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. These equations also provide for estimating doses based upon the historical average atmospheric conditions.

The release rate specifications for radioactive materials in particulate form are dependent on the existing radionuclide pathways to man in areas at or beyond the Site Boundary for Gaseous Effluents (see Attachment 3). The pathways which were examined in the development of these calculations are: (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.

6.11.7 Ventilation Exhaust Treatment System

Specifications:

The following two conditions shall not exist simultaneous:

- (1) Gaseous waste is being discharged without treatment, and
- (2) The projected doses due to gaseous effluent releases from the site (see Attachment 3), when averaged over 31 days, would exceed 2% of the 10 CFR 50, Appendix I annual dose guidelines (0.3 mrem to any organ, or air doses of 0.2 mrad from gamma radiation or 0.4 mrad from beta radiation).

Applicability:

This is applicable at all times.

Action:

If both parts 1) and 2) of the Specification are satisfied, prepare and submit to the Commission within 30 days a Special Report pursuant to Appendix A of the RSQM, which includes the following information:

- a. Explanation of why gaseous Radwaste was being discharged without treatment, and identification of the equipment or subsystems not OPERABLE and the reason for inoperability.
- b. Action(s) taken to restore the inoperable equipment to OPERABLE STATUS.
- c. Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements:

Doses due to gaseous releases to areas at and beyond the Site Boundary for Gaseous Effluents (see Attachment 3) shall be projected at least once per 31 days in accordance with the methodology and parameters in Step 6.8.

Filter integrity is ensured through effluent sampling

Bases:

The operation of the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the systems are 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 are maintained "as low as is reasonably achievable". The specified limits governing the use of appropriate portions of the systems and the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR 50, for gaseous effluents.

6.11.8 Fuel Cycle Dose

Specification:

The dose or dose commitment to any real MEMBER OF THE PUBLIC due to releases of radioactive material in gaseous and liquid effluents and to direct radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrem to the total body or any organ in a calendar year.

Applicability:

At all times.

Action:

- 1) With the calculated doses from the release of radioactive material in liquid or gaseous effluents exceeding twice the limits of Specifications in Steps 6.11.2 and 6.11.76 or exceeding the reporting levels in Table 3 of the REMP Manual, calculations shall be made including direct radiation contributions (including outside storage tanks, etc.) to determine whether the above specifications have been exceeded.
- 2) If the above limits have been exceeded, 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 Part 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, in a 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.
- 3) If the estimated dose(s) exceed the above limits, and if the release condition resulting in the 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 provision of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

Surveillance Requirements:

Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Step 6.11.2 and 6.11.5 Surveillance Requirements.

Cumulative dose contributions from direct radiation (including outside storage tanks, etc.) shall be determined in accordance with Step 6.9. This requirement is applicable only under the conditions set forth in the above Action statements.

Bases:

Step 6.11.8 is provided to meet the dose limitations of 40 CFR 190 that have been incorporated into 10 CFR 20 by 46 FR 18525. The specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant radioactive effluents exceed twice the numerical guides for design objective doses of 10 CFR 50, Appendix I or exceeds the reporting levels of the Radiological Environmental Monitoring Program. For the Rancho Seco site, it is unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR 190 if the plant remains within twice the numerical guides for design objectives of 10 CFR 50, Appendix I and if direct radiation (outside storage tanks, etc.) is kept small. The Special Report will describe a course of action, which should result in the limitation of the dose to a MEMBER OF THE PUBLIC for a calendar year to within the 40 CFR 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 5 miles must be considered. If the dose to any MEMBER OF THE PUBLIC is evaluated to exceed the requirements of 40 CFR 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR 190 have not already been corrected), in accordance with the provisions of 40 CFR 190 is considered to be a timely request and fulfills the requirements of 40 CFR 190 until NRC staff action is completed. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation, which is part of the uranium fuel cycle.

6.11.9 Quarter/ Annual Dose Projections

Specifications:

The projected dose contributions from liquid and gaseous effluents for the current calendar quarter and current calendar year shall be calculated according to the methodology in Steps 6.4 and 6.8 at least every 31 days.

Applicability:

At all times.

Action:

With the required dose calculations not being performed, best effort will be exerted to perform the calculations once the deficiency has been identified. Corrective actions will be taken and documented to prevent reoccurrence.

Surveillance Requirements

1) Liquid Effluents:

Projected dose contributions shall be determined at least every 31 days.

2) Gaseous Effluents:

Projected dose contributions shall be determined at least every 31 days.

Bases:

This step is provided to implement Appendix A of the Rancho Seco Quality Manual. Dose projections provide a means of determining if current release practices will be within the dose limits of 10 CFR 50, Appendix I. Calculating projected dose totals every 31 days provides information, which can be used to keep effluent releases "as low as is reasonably achievable".

Calculations performed during the first 15 days of the calendar year or calendar quarter will result in artificially high dose projections, which provide no usable information.

6.12 Reports

6.12.1 Annual Radioactive Effluent Release Report (ARERR)

The ARERR covering the activities of the unit during the previous 12 months shall be submitted within 90 days after January 1 of each year. The report shall include the following:

- (1) Summary of the quantities of radioactive liquid and gaseous effluents released from the unit.
- (2) Summary of solid waste shipped from the unit.
- (3) All unplanned releases of radioactive materials in gaseous and liquid effluents to unrestricted areas shall include a description of the event and equipment involved, cause(s), action(s) taken to prevent recurrence, and consequences.
- (4) Dose or dose commitment assessments to ensure compliance with the specifications in 6.11.2, 6.11.6.
- (5) Complete, legible copy of the entire ODCM and/or REMP Manual if changes occurred during the ARERR reporting period. The copy may be part of the ARERR or sent concurrently.
- (6) The ARERR shall also include events described in 6.11.1, 6.11.3, and 6.11.4.

6.12.2 30 Day Reports

The following 30-day reports should be submitted if the criteria are met as stated in the following areas:

- (1) 6.11.2 - Liquid Dose Calculations
- (2) 6.11.9 - Liquid Dose Projections
- (3) 6.11.6 - Gaseous Organ Dose
- (4) 6.11.9 - Gaseous Dose Projections
- (5) 6.11.8 - Fuel Cycle Dose

7.0 RECORDS

The individual/packaged documents and related correspondence completed as a result of the performance or implementation of this procedure are records. They shall be transmitted to Records Management in accordance with RSAP-0601, Nuclear Records Management.

DOSE FACTOR PARAMETERS

CONSUMPTION AND USAGE PARAMETERS

<u>PATHWAY</u>	<u>AGE</u>	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Irrigated Stored Vegetables	Adult	520 kg/yr	520 kg/yr
	Teen	630 kg/yr	630 kg/yr
	Child	520 kg/yr	520 kg/yr
	Infant	0 kg/yr	0 kg/yr
Irrigated Fresh Vegetables	Adult	64 kg/yr	64 kg/yr
	Teen	42 kg/yr	42 kg/yr
	Child	26 kg/yr	26 kg/yr
	Infant	0 kg/yr	0 kg/yr
Irrigated Milk	Adult	310 kg/yr	310 kg/yr
	Teen	400 kg/yr	400 kg/yr
	Child	330 kg/yr	330 kg/yr
	Infant	330 kg/yr	330 kg/yr
Irrigated Meat & Poultry	Adult	110 kg/yr	110 kg/yr
	Teen	65 kg/yr	65 kg/yr
	Child	41 kg/yr	41 kg/yr
	Infant	0 kg/yr	0 kg/yr
Fish	Adult	21 kg/yr	21 kg/yr
	Teen	16 kg/yr	16 kg/yr
	Child	6.9 kg/yr	6.9 kg/yr
	Infant	0 kg/yr	0 kg/yr
Other Seafood Invertebrate (Crayfish)	Adult	5.0 kg/yr	6.9 kg/yr
	Teen	3.8 kg/yr	5.2 kg/yr
	Child	1.7 kg/yr	2.2 kg/yr
	Infant	0 kg/yr	0 kg/yr
Algae	Adult	None	0 kg/yr
	Teen	None	0 kg/yr
	Child	None	0 kg/yr
	Infant	None	0 kg/yr
Water Usage (Drinking Water)	Adult	730 l/yr	0 l/yr
	Teen	510 l/yr	0 l/yr
	Child	510 l/yr	0 l/yr
	Infant	330 l/yr	0 l/yr

DOSE FACTOR PARAMETERS (Continued)

CONSUMPTION AND USAGE PARAMETERS (continued)

<u>PATHWAY</u>	<u>AGE</u>	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Shoreline Recreation	Adult	12 hr/yr	200 hr/yr
	Teen	67 hr/yr	100 hr/yr
	Child	14 hr/yr	14 hr/yr
	Infant	0 hr/yr	0 hr/yr
Swimming	Adult	None	100 hr/yr
	Teen	None	100 hr/yr
	Child	None	14 hr/yr
	Infant	None	0 hr/yr
Boating	Adult	None	0 hr/yr
	Teen	None	0 hr/yr
	Child	None	0 hr/yr
	Infant	None	0 hr/yr
Inhalation	Adult	8000 m ³	8000 m ³
	Teen	8000 m ³	8000 m ³
	Child	3700 m ³	3700 m ³
	Infant	1400 m ³	1400 m ³

IRRIGATION RATES AND FRACTION OF IRRIGATION

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Irrigation Rate	263 liters/m ² /month	263 liters/m ² /month
Time field has been irrigated prior to crop of interest	15 years	15 years
Fraction of the year field is irrigated	None	None
Fraction of animal water intake not obtained from the irrigation system (Irrigated Meat)	None	0
Fraction of animal water intake not obtained from the irrigation system (Irrigated Milk)	None	1

DOSE FACTOR PARAMETERS (Continued)

TRANSIT, TRANSFER, AND HOLDUP TIMES

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Irrigated Stored Vegetables Holdup Time	1440 hrs	1440 hrs
Irrigated Fresh Vegetables Holdup Time	24 hrs	24 hrs
Irrigated Milk Holdup Time	48 hrs	48 hrs
Irrigated Meat Holdup Time	480 hrs	480 hrs
Transit Time From Time Of Sample To Time Of Release	None	72 hrs
Transit Time To Drinking Water	None	0 hrs

DILUTIONS

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
All Pathways	None	1(None)
Shore-Width Factor	0.2	0.2

MISCELLANEOUS

	<u>1.109 DEFAULT</u>	<u>RSNGS</u>
Fraction Of Leafy Vegetables Grown In Garden Of Interest	1.0	1.0
Fraction Of Produce Ingested Grown In Garden Of Interest	0.76	0.76
Crop Growing Time For Leafy Vegetables Ingested By Man	60 Days	30 Days
Crop Growing Time For Pasture Grass	30 Days	30 Days
Crop Yield For Leafy Vegetables Ingested By Man	2.0 kg/m ²	2.0 kg/m ²
Crop Yield For Pasture Grass	0.7 kg/m ²	2.0 kg/m ²

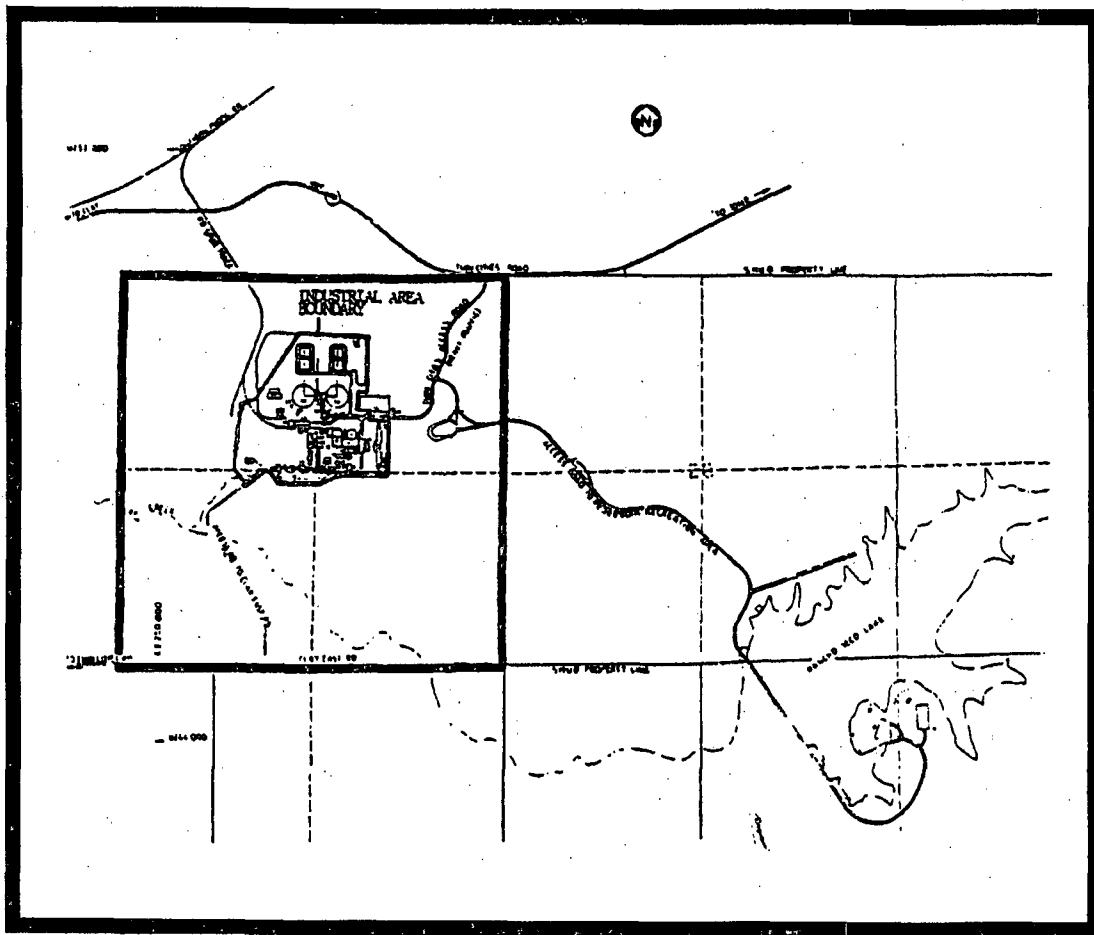
ATMOSPHERIC DISPERSION AND DEPOSITION PARAMETERS
GASEOUS EFFLUENT PATHWAYS
1998 CONTROLLING LOCATIONS**

<u>PATHWAY</u>	<u>DIRECTION</u>	<u>DISTANCE</u>	<u>X/Q*</u> (sec/m ³)	<u>D/Q*</u> (m ⁻²)
Inhalation	ENE	1038 M	8.1E-06	--
Ground	ENE	1038 M	--	4.8E-08
Vegetation	SSW	670 M	1.4E-05	2.8E-08
Cow Milk	ENE	1038 M	8.1E-06	4.8E-08
Meat Animal	S	195 M	1.2E-04	--
Meat Animal	SSE	198 M	--	3.4E-07
Goat Milk	SSW	2500 M	1.0E-06	1.7E-09
Site Boundary for Gaseous Effluents	NNW	670 M	2.1E-05	--

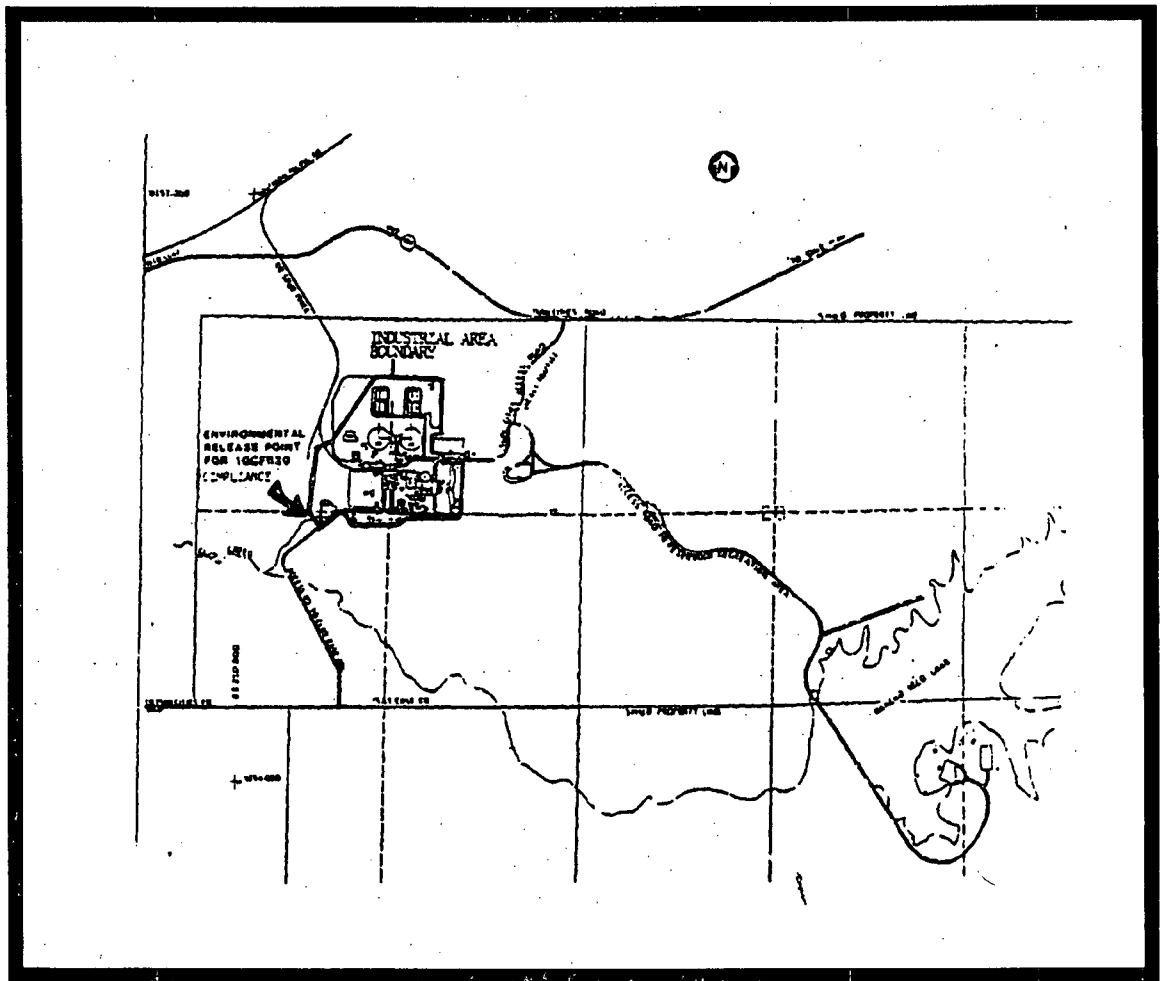
* Based on meteorological data from January 1978 to December 1987.

** Based on 1998 Land Use Census.

SITE BOUNDARY FOR GASEOUS EFFLUENTS



SITE BOUNDARY FOR LIQUID EFFLUENTS



ORGAN DOSE FACTORS FOR LIQUID EFFLUENTS

DOSE FACTOR TABLE: A(i) - Adult
Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.21E+01	1.21E+01	1.21E+01	1.21E+01	1.21E+01	1.21E+01
C-14	3.82E+05	7.63E+04	7.63E+04	7.63E+04	7.63E+04	7.63E+04	7.63E+04
FE-55	1.18E+04	8.17E+03	1.91E+03	7.29E-04	7.29E-04	4.56E+03	4.69E+03
CO-60	1.26E+04	1.61E+04	2.02E+04	1.26E+04	1.26E+04	1.26E+04	7.73E+04
NI-63	3.42E+05	2.37E+04	1.15E+04	0.00E+00	0.00E+00	0.00E+00	4.95E+03
CS-134	4.44E+05	1.05E+06	8.59E+05	4.03E+03	3.43E+05	1.16E+05	2.23E+04
CS-137	5.85E+05	7.98E+05	5.25E+05	6.06E+03	2.75E+05	9.54E+04	2.14E+04

DOSE FACTOR TABLE: A(i) - Teen
Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.37E+01	1.37E+01	1.37E+01	1.37E+01	1.37E+01	1.37E+01
C-14	5.64E+05	1.13E+05	1.13E+05	1.13E+05	1.13E+05	1.13E+05	1.13E+05
FE-55	1.37E+04	9.69E+03	2.26E+03	7.29E-04	7.29E-04	6.15E+03	4.19E+03
CO-60	6.35E+03	1.10E+04	1.69E+04	6.35E+03	6.35E+03	6.35E+03	6.71E+04
NI-63	4.50E+05	3.18E+04	1.53E+04	0.00E+00	0.00E+00	0.00E+00	5.06E+03
SR-90	7.40E+06	6.16E-03	1.98E+06	6.16E-03	6.16E-03	6.16E-03	3.85E+05
CS-134	5.04E+05	1.18E+06	5.50E+05	2.03E+03	3.77E+05	1.45E+05	1.67E+04
CS-137	6.99E+05	9.30E+05	3.26E+05	3.03E+03	3.18E+05	1.26E+05	1.62E+04

DOSE FACTOR TABLE: A(i) - Child
Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	2.10E+01	2.10E+01	2.10E+01	2.10E+01	2.10E+01	2.10E+01
FE-55	2.40E+04	1.27E+04	3.94E+03	1.02E-04	1.02E-04	7.19E+03	2.35E+03
CO-60	8.89E+02	7.51E+03	2.04E+04	8.89E+02	8.89E+02	8.89E+02	3.76E+04
SR-90	1.47E+07	8.62E-04	3.93E+06	8.62E-04	8.62E-04	8.62E-04	2.97E+05
CS-134	7.61E+05	1.25E+06	2.64E+05	2.85E+02	3.87E+05	1.39E+05	7.02E+03
CS-137	1.12E+06	1.07E+06	1.59E+05	4.25E+02	3.50E+05	1.26E+05	7.15E+03

ORGAN DOSE FACTORS FOR LIQUID EFFLUENTS (Continued)

DOSE FACTOR TABLE: A(i) - Infant

Units are mrem/hr per μ Ci/ml

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.14E+01	1.14E+01	1.14E+01	1.14E+01	1.14E+01	1.14E+01
FE-55	5.61E+02	3.63E+02	9.69E+01	0.00E+00	0.00E+00	1.77E+02	4.61E+01
CO-60	0.00E+00	3.81E+02	8.99E+02	0.00E+00	0.00E+00	0.00E+00	9.06E+02
NI-63	1.72E+05	1.06E+04	5.97E+03	0.00E+00	0.00E+00	0.00E+00	5.29E+02
SR-90	3.91E+05	0.00E+00	1.05E+05	0.00E+00	0.00E+00	0.00E+00	7.22E+03
CS-134	1.55E+05	2.89E+05	2.92E+04	0.00E+00	7.43E+04	3.05E+04	7.84E+02
CS-137	2.32E+05	2.71E+05	1.92E+04	0.00E+00	7.27E+04	2.94E+04	8.47E+02

ORGAN DOSE FACTORS FOR GASEOUS EFFLUENTS

DOSE FACTOR TABLE: R(i) - Adult, inhalation

Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03
FE-55	2.46E+04	1.70E+04	3.95E+03	0.00E+00	0.00E+00	7.21E+04	6.03E+03
CO-60	0.00E+00	1.15E+04	1.48E+04	0.00E+00	0.00E+00	5.97E+06	2.85E+05
SR-90	9.92E+07	0.00E+00	6.10E+06	0.00E+00	0.00E+00	9.60E+06	7.22E+05
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	4.79E+05	6.21E+05	4.28E+05	0.00E+00	2.23E+05	7.52E+04	8.40E+03

DOSE FACTOR TABLE: R(i) - Teen, inhalation,

Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03
FE-55	3.35E+04	2.39E+04	5.55E+03	0.00E+00	0.00E+00	1.24E+05	6.39E+03
CO-60	0.00E+00	1.51E+04	1.98E+04	0.00E+00	0.00E+00	8.72E+06	2.59E+05
SR-90	1.08E+08	0.00E+00	6.68E+06	0.00E+00	0.00E+00	1.65E+07	7.65E+05
CS-134	5.03E+05	1.13E+06	5.49E+05	0.00E+00	3.75E+05	1.46E+05	9.76E+03
CS-137	6.71E+05	8.48E+05	3.11E+05	0.00E+00	3.04E+05	1.21E+05	8.48E+03

DOSE FACTOR TABLE: R(i) - Child, inhalation

Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	1.13E+03	1.13E+03	1.13E+03	1.13E+03	1.13E+03	1.13E+03
FE-55	4.74E+04	2.52E+04	7.77E+03	0.00E+00	0.00E+00	1.11E+05	2.87E+03
CO-60	0.00E+00	1.31E+04	2.27E+04	0.00E+00	0.00E+00	7.07E+06	9.62E+04
SR-90	1.01E+08	0.00E+00	6.44E+06	0.00E+00	0.00E+00	1.48E+07	3.44E+05
CS-134	6.51E+05	1.01E+06	2.25E+05	0.00E+00	3.31E+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

DOSE FACTOR TABLE: R(i) - Infant, inhalation

Units are mrem/yr per $\mu\text{Ci}/\text{m}^3$

Nuclide	Bone	Liver	Tbody	Thyroid	Kidney	Lung	GI tract
H-3	0.00E+00	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02
FE-55	1.97E+04	1.18E+04	3.33E+03	0.00E+00	0.00E+00	8.70E+04	1.10E+03
CO-60	0.00E+00	8.03E+03	1.18E+04	0.00E+00	0.00E+00	4.51E+06	3.19E+04
SR-90	4.09E+07	0.00E+00	2.59E+06	0.00E+00	0.00E+00	1.12E+07	1.31E+05
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

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

Instrument	Minimum Number of Channels Operable	Action
1. Flow Measurement Devices		
Waste Water Flow Rate and Totalizer (FIRQ95108)	1	With the flow measurement device inoperable, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during temporary tank releases by a level device in the discharge stream.
Temporary Tank Discharge Flow Rate device to be installed prior to release	1	With the flow rate measurement device inoperable, effluent releases via this pathway may continue provided that the temporary tank discharge flow rate is estimated using the Waste Water Flow Rate instrument.

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE
REQUIREMENTS

<u>Instrument</u>	<u>Instrument Channel Check</u>	<u>Instrument Channel Calibration</u>	<u>Channel Test</u>
1 Flow Monitors			
Waste Water Flow Rate and Totalizer (FIRQ95108)	D ⁽¹⁾	R	Q
Temporary Tank Discharge Flow Rate	D ⁽¹⁾	R	Q

Table Notation

- (1) The Instrument Channel Check shall consist of verifying indication of flow during periods of release. The Instrument Channel Check shall be made at least once daily on any day in which batch releases are made.

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity	Lower Limit of Detection (LLD) ^(a) (µCi/ml)
Temporary Tank ^(b,c,d)	Each Batch P	Each Batch P	H-3	1.00 E-05
			Co-60	4.00 E-09
			Cs-134, Cs-137	3.00 E-09
	Each Batch P	Composite ^(e) M	Sr-90	1.00 E-09
			Gross Alpha	1.00 E-07

Table Notation

- (a) 1. The Lower Limits of Detection (LLDs) for the radionuclides presented in this table are the smallest concentrations (expressed in microcuries per milliliter) which are required to be detected, if present, in order to achieve compliance with the limits of Step 6.11.2 (10 CFR 50, Appendix I) and assurance of compliance with the limits of Step 6.11.1 (10 CFR 20, Appendix B, Table 2, Column 2) for a Temporary Tank Discharge.
2. The LLD of a radioanalysis system is that value which will indicate the presence or absence of radioactivity in a sample when the probability of a false positive and of a false negative determination is stated. The probabilities of the false positive and false negative are taken as equal at 0.05. The general equation for estimating the maximum LLD in microcuries per milliliter is given by the following:

$$LLD = \frac{2.71/t_s + 3.29 \times S_b}{(3.70 \text{ E} + 04)(Y \times E \times V)e^{(-\lambda t_c)}}$$

Where:

- 2.71 = factor to account for Poisson statistics at very low background count rates
- 3.29 = two times the constant used to establish the one sided 0.95 confidence interval
- 3.70 E+04 = disintegrations/second/microcurie
- Y = yield of radiochemical process, i.e., the product of all factors such as emission fraction, chemical yield, etc.
- E = counting efficiency (count/disintegrations)

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM (Continued)

Table Notation (Continued)

V = sample volume (milliliters)

λ = the radioactive decay constant for the particular nuclide (seconds⁻¹)

t_c = the elapsed time from midpoint of collection to the midpoint of counting

S_b = the standard deviation of the background counting rate

$$S_b = \left(\frac{B}{t_b t_s} + \frac{B}{t_b^2} \right)^{0.5}$$

Where:

B = background counts

t_b = background counting interval (seconds)

t_s = sample counting interval (seconds)

3. The LLD is defined as an a priori (before the fact) estimate and is not to be calculated for each sample analyzed on an a posteriori (after the fact) basis.
- (b) A batch release is the discharge of liquid wastes of discrete volume from the temporary tank(s).
 - (c) A Temporary Tank will be isolated and its contents thoroughly mixed to assure representative sampling.
 - (d) Isotopic peaks which are measurable and identifiable from a temporary tank sample analysis shall be reported and included in ODCM evaluations. Nuclides which are not observed in the analysis shall be reported as "less than" the nuclide's a posteriori minimum detectable concentration and shall not be reported as being present. The "less than" results shall be considered "zero" for the purposes of ODCM evaluations; however, if a nuclide is measured and identified at a value less than the Attachment 9 LLD value, it shall be reported and entered in ODCM evaluations.
 - (e) A composite sample shall be obtained by mixing liquid aliquot volumes in proportion to the volume of liquid released from each temporary tank.

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>Instrument</u>	<u>Action</u>
1. IOSB Reactor Building	
a. Particulate Sampler	These samples are analyzed in accordance with Attachment 11.
b. Sampler Flow Rate Measurement Device	Only samplers with a calibrated flow-measuring device may be used.

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis ^(c)	Lower Limit of Detection (LLD) ^(a) (μCi/cc)
Reactor Building	Continuous (during operation)	M Particulate Sample	Principal Gamma Emitters	1.00 E-11
IOS Building	Continuous ^(b)	M Particulate Sample	Principal Gamma Emitters	1.00 E-11

Table Notation

- (a) 1. The Lower Limits of Detection (LLDs) for the radionuclides presented in this table are the smallest concentration (expressed in microcuries per unit volume) which are required to be detected, if present, in order to achieve compliance with the limits of the Specifications in Steps 6.11.5, and 6.11.6.
2. The LLD of a radioanalysis system is that value which will indicate the presence or absence of radioactivity in a sample when the probability of a false positive and of a false negative determination is stated. The probabilities of the false positive and false negative are taken as equal at 0.05. The general equation for estimating the maximum LLD in microcuries per cubic centimeter (μCi/cc) is given by the following:

$$LLD = \frac{2.71/t_s + 3.29 \times S_b}{(3.70 \text{ E} + 04)(Y \times E \times V)e^{(-\lambda t_c)}}$$

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM
(Continued)

Where:

2.71 = factor to account for Poisson statistics at very low background count rates

3.29 = two times the constant used to establish the one sided 0.95 confidence interval

3.70 E+04 = disintegrations/second/microcurie

Y = yield of radiochemical process, i.e., the product of all factors such as emission fraction, chemical yield, etc.

E = counting efficiency (count/disintegrations)

V = sample volume (cubic centimeters)

λ = the radioactive decay constant for the particular nuclide (seconds⁻¹)

t_c = the elapsed time from midpoint of collection to the midpoint of counting

S_b = the standard deviation of the background counting rate

$$S_b = \left(\frac{B}{t_b t_s} + \frac{B}{t_b^2} \right)^{0.5}$$

Where:

B = background counts

t_b = background counting interval (seconds)

t_s = sample counting interval (seconds)

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM (Continued)

Table Notation (Continued)

3. The LLD is defined as an a priori (before the fact) estimate and is not to be calculated for each sample analyzed on an a posteriori (after the fact) basis.
 - (b) Sample during Dismantlement activities.
 - (c) Principal gamma emitters for which the LLD applies are: Co-60, Cs-134, and Cs-137 for particulate samples. This does not mean only these nuclides will be detected and reported. Other peaks that are measurable and identifiable shall be reported in the Annual Radioactive Effluent Release Report, pursuant to Step 6.12.1. All peaks, which are measurable and identifiable, shall be reported and entered into the ODCM evaluations. Nuclides, which are not observed for the analysis shall be reported as "less than" the nuclide's a posteriori minimum detectable concentration and shall not be reported as being present. The "less than" results shall be considered "zero" for the ODCM evaluations; however, if a nuclide is measured and identified at a value less than the Attachment 11 LLD value, it shall be reported and entered into ODCM evaluations.

ODCM REVISION REVIEW REQUIREMENTS

ODCM REVISION REVIEW REQUIREMENTS

Whenever the ODCM is revised, no matter what the changes are, several reviews must be performed. These reviews must also be documented. The documentation is often included as an attachment to the 50.59 Safety Determination. This form lists the minimum reviews and documentation required for each change. Initial each requirement as it is completed. Sign the bottom of the form when all review requirements are completed.

Initials

I. Determination that the level of control of radioactive effluents is being maintained.

This determination is made by review of the following documents:

- 10 CFR 20.1301 and 20.1302
- 10 CFR 50.36a
- Appendix I to 10 CFR 50
- 40 CFR 190

II. Determination that the change(s) will not adversely affect the accuracy or reliability of effluent dose calculations or effluent monitor setpoint determinations.

This determination is made by directly reviewing each change to the ODCM. Although each change must be evaluated, changes that directly involve calculations should be more carefully considered.

III. Supporting information.

Full justification including analyses and evaluations to support the change(s) must be included in the review and approval package.

IV. Notification of NRC.

The NRC is notified of all changes to the ODCM by including a complete, legible copy as part of, or concurrent with, the Annual Radioactive Effluent Release Report (ARERR). To ensure inclusion in the ARERR a LRS item should be initiated whenever the ODCM is revised.

V. Implementing Documents

The following documents should be reviewed for impact whenever the ODCM is revised:

- CAP-0008, Offsite Releases of Radioactivity in Liquid Effluents
- CAP-0009, Offsite Releases of Radioactivity in Liquid Effluents
- CAP-0013, Preparation of the Annual Radioactive Effluent Release Report
- CHM-5107, Compositing of Liquid Samples
- CHM-5109, Effluent Monitor Alarm Response Procedure

VI. Multidiscipline Review

Ensure all areas that may be affected by the revision, or have an interest in the changes made in the revision, are included in the multidiscipline review. Areas that are affected by the ODCM and could be included in this review are: Technical Services, Surveillance Scheduler, Quality Assurance, Licensing, and Operations.

All Reviews Complete: _____
Reviewer Signature Date

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