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May 14, 2009

BVY 09-036

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: 2008 Annual Radiological Environmental Operating Report
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

Dear Sir or Madam,

In accordance with Vermont Yankee Technical Specification 6.6.E, attached is a copy of the 2008 Annual Radiological Environmental Operating Report. This report contains a summary and analysis of the radiological environmental data collected for the calendar year 2008.

There are no new regulatory commitments being made in this submittal.

Should you have any questions concerning this submittal, please contact Mr. David J. Mannai at (802) 451-3304.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Colomb".

[MJC/JTM]

Attachment 1: Annual Radiological Environmental Operating Report – Year 2008

cc listing (next page)

IE25
NRR

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Docket No. 50-271
BVY 09-036

Attachment 1

Vermont Yankee Nuclear Power Station

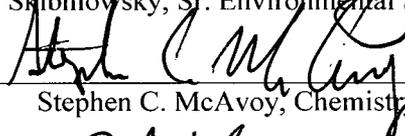
2008 Annual Radiological Environmental Operating Report

**ENERGY - VERMONT YANKEE
Vermont Yankee Nuclear Power Station**

**ANNUAL RADIOLOGICAL ENVIRONMENTAL
OPERATING REPORT**

Year 2008

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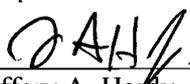
Approved for Distribution:  5/12/09
Jeffery A. Hardy, Chemistry Superintendent Date

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1. INTRODUCTION

This report summarizes the findings of the Radiological Environmental Monitoring Program (REMP) conducted by Entergy-Vermont Yankee in the vicinity of the Vermont Yankee Nuclear Power Station (VYNPS) in Vernon, Vermont during the calendar year 2008. The analyses of samples collected indicated that no plant-generated radioactive material was found in any location off site. In all cases, the possible radiological impact was negligible with respect to exposure from natural background radiation. In no case did the detected levels exceed the most restrictive federal regulatory or plant license limits for radionuclides in the environment. Measured values were several orders of magnitude below reportable levels listed in Table 4.5 of this report. Except for sample deviations listed in Section 6.1, all other samples were collected and analyzed as required by the program.

This report is submitted annually in compliance with plant Technical Specification 6.6.E. The remainder of this report is organized as follows:

Section 2: Provides an introductory explanation of background radioactivity and radiation detected in the plant environs.

Section 3: Provides a brief description of the Vermont Yankee Nuclear Power Station site and its environs.

Section 4: Provides a description of the overall REMP program design. Included is a summary of the Vermont Yankee Nuclear Power Station (VYNPS) Off-Site Dose Calculation Manual (ODCM) requirements for REMP sampling, tables listing all locations sampled or monitored in 2008 with compass sectors and distances from the plant, and maps showing each REMP location. Tables listing Lower Limit of Detection requirements and Reporting Levels are also included.

Section 5: Consists of the summarized data as required by the VYNPS ODCM. The tables are in a format similar to that specified by the NRC Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 1). Also included is a summary of the 2008 environmental TLD measurements.

Section 6: Provides the results of the 2008 monitoring program. The performance of the program in meeting regulatory requirements as given in the ODCM is discussed, and the data acquired during the year are analyzed.

Section 7: Provides an overview of the Quality Assurance programs used at AREVA Framatome ANP Environmental Laboratory, Teledyne Brown Engineering and Entergy James A. Fitzpatrick's Environmental Laboratory.

Section 8: Summarizes the requirements and the results of the 2008 Land Use Census.

Section 9: Gives a summary of the 2008 Radiological Environmental Monitoring Program.

2. BACKGROUND RADIOACTIVITY

Radiation or radioactivity potentially detected in the Vermont Yankee environment can be grouped into three categories. The first is “naturally-occurring” radiation and radioactivity. The second is “man-made” radioactivity from sources other than the Vermont Yankee plant. The third potential source of radioactivity is due to emissions from the Vermont Yankee plant. For the purposes of the Vermont Yankee REMP, the first two categories are classified as “background” radiation, and are the subject of discussion in this section of the report. The third category is the one that the REMP is designed to detect and evaluate.

2.1 Naturally Occurring Background Radioactivity

Natural radiation and radioactivity in the environment, which provide the major source of human radiation exposure, may be subdivided into three separate categories: “primordial radioactivity,” “cosmogenic radioactivity” and “cosmic radiation.” “Primordial radioactivity” is made up of those radionuclides that were created with the universe and that have a sufficiently long half-life to be still present on the earth. Included in this category are the newly-formed “daughter” radionuclides descending from these original elements. A few of the more important radionuclides in this category are Uranium-238 (U-238), Thorium-232 (Th-232), Rubidium-87 (Rb-87), Potassium-40 (K-40), Radium-226 (Ra-226), and Radon-222 (Rn-222). Uranium-238 and Thorium-232 are readily detected in soil and rock, whether through direct field measurements or through laboratory analysis of samples. Radium-226 in the earth can find its way from the soil into ground water, and is often detectable there. Radon-222 is one of the components of natural background in air, and its daughter products are detectable on air sampling filters. Potassium-40 comprises about 0.01 percent of all natural potassium in the earth, and is consequently detectable in most biological substances, including the human body. There are many more primordial radionuclides found in the environment in addition to the major ones discussed above (Reference 2).

The second sub-category of naturally-occurring radiation and radioactivity is “cosmogenic radioactivity.” This is produced through the nuclear interaction of high energy cosmic radiation with elements in the earth’s atmosphere, and to a much lesser degree, in the earth’s crust. These radioactive elements are then incorporated into the entire geosphere and atmosphere, including the earth’s soil, surface rock, biosphere, sediments, ocean floors, polar ice and atmosphere. The major radionuclides in this category are Carbon-14 (C-14), Hydrogen-3 (H-3 or Tritium), Sodium-22 (Na-22), and Beryllium-7 (Be-7). Beryllium-7 is the one most readily detected, and is found on air sampling filters and occasionally in biological media (Reference 2).

The third sub-category of naturally-occurring radiation and radioactivity is "cosmic radiation." This consists of high energy atomic and sub-atomic particles of extra-terrestrial origin and the secondary particles and radiation that are produced through their interaction in the earth's atmosphere. The majority of this radiation comes from outside of our solar system, and to a lesser degree from the sun. We are protected from most of this radiation by the earth's atmosphere, which absorbs the radiation. Consequently, one can see that with increasing elevation one would be exposed to more cosmic radiation as a direct result of a thinner layer of air for protection. This "direct radiation" is detected in the field with gamma spectroscopy equipment, high pressure ion chambers and thermoluminescent dosimeters (TLDs).

2.2 Man-Made Background Radioactivity

The second source of "background" radioactivity in the Vermont Yankee environment is from "man-made" sources not related to the power plant. The most recent contributor to this category was the fallout from the Chernobyl accident in April of 1986, which was detected in the Vermont Yankee environment and other parts of the world. A much greater contributor to this category, however, has been fallout from atmospheric nuclear weapons tests. Tests were conducted from 1945 through 1980 by the United States, the Soviet Union, the United Kingdom, China and France, with the large majority of testing occurring during the periods 1954-1958 and 1961-1962. (A test ban treaty was signed in 1963 by the United States, Soviet Union and United Kingdom, but not by France and China.) Atmospheric testing was conducted by the People's Republic of China as recently as October 1980. Much of the fallout detected today is due to this explosion and the last large scale one, done in November of 1976 (Reference 3).

The radioactivity produced by these detonations was deposited worldwide. The amount of fallout deposited in any given area is dependent on many factors, such as the explosive yield of the device, the latitude and altitude of the detonation, the season in which it occurred, and the timing of subsequent rainfall which washes fallout from the troposphere (Reference 4). Most of this fallout has decayed into stable elements, but the residual radioactivity is still readily detectable in environmental samples worldwide. The two predominant radionuclides are Cesium-137 (Cs-137) and Strontium-90 (Sr-90). They are found in soil and in vegetation, and since cows and goats graze large areas of vegetation, these radionuclides are also readily detected in milk.

Other potential "man-made" sources of environmental "background" radioactivity include other nuclear power plants, coal-fired power plants, national defense installations, hospitals, research laboratories and industry. These collectively are insignificant on a global scale when compared to the sources discussed above (natural and fallout).

3. GENERAL PLANT AND SITE INFORMATION

The Vermont Yankee Nuclear Power Station is located in the town of Vernon, Vermont in Windham County. The 130-acre site is on the west shore of the Connecticut River, immediately upstream of the Vernon Hydroelectric Station. The plant site is bounded on the north, south and west by privately-owned land, and on the east by the Connecticut River. The surrounding area is generally rural and lightly populated, and the topography is flat or gently rolling on the valley floor.

Construction of the single unit 540 megawatt BWR (Boiling Water Reactor) plant began in 1967. The pre-operational Radiological Environmental Monitoring Program, designed to measure environmental radiation and radioactivity levels in the area prior to station operation, began in 1970. Commercial operation began on November 30, 1972. An Extended Power Uprate, conducted in 2006, resulted in the present generation capacity of 650 megawatts electric.

4. PROGRAM DESIGN

The Radiological Environmental Monitoring Program (REMP) for the Vermont Yankee Nuclear Power Station (VYNPS) was designed with specific objectives in mind. These are:

- To provide an early indication of the appearance or accumulation of any radioactive material in the environment caused by the operation of the station.
- To provide assurance to regulatory agencies and the public that the station's environmental impact is known and within anticipated limits.
- To verify the adequacy and proper functioning of station effluent controls and monitoring systems.
- To provide standby monitoring capability for rapid assessment of risk to the general public in the event of unanticipated or accidental releases of radioactive material.

The program was initiated in 1970, approximately two years before the plant began commercial operation. It has been in operation continuously since that time, with improvements made periodically over those years.

The current program is designed to meet the intent of NRC Regulatory Guide 4.1, *Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants*; NRC Regulatory Guide 4.8, *Environmental Technical Specifications for Nuclear Power Plants*; the NRC Radiological Assessment Branch Technical Position of November 1979, *An Acceptable Radiological Environmental Monitoring Program*; and NRC NUREG-0473, *Radiological Effluent Technical Specifications for BWRs*. The environmental TLD program has been designed and tested around NRC Regulatory Guide 4.13, *Performance, Testing and Procedural Specifications for Thermoluminescence Dosimetry: Environmental Applications*. The quality assurance program is designed around the guidance given in NRC Regulatory Guide 4.15, *Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment*.

The sampling requirements of the REMP are given in the Off-Site Dose Calculation Manual Table 3.5.1 and are summarized in Table 4.1 of this report. The identification of the required sampling locations is given in the Off-Site Dose Calculation Manual (ODCM), Chapter 7. These sampling and monitoring locations are shown graphically on the maps in Figures 4.1 through 4.6 of this report.

The Vermont Yankee Chemistry Department conducts the radiological environmental monitoring program and collects all airborne, terrestrial and ground water samples. VYNPS maintains a contract with Normandeau Associates to collect all fish, river water and river sediment samples. In 2008, analytical measurements of environmental samples were performed at the Entergy Nuclear Northeast J. A. Fitzpatrick N.P.P Environmental laboratory in Oswego, New York. TLD badges are posted and retrieved by the Vermont Yankee Chemistry Department, and are analyzed by the AREVA NP INC. Environmental Laboratory in Westborough, Massachusetts.

4.1 Monitoring Zones

The REMP is designed to allow comparison of levels of radioactivity in samples from the area possibly influenced by the plant to levels found in areas not influenced by the plant. Monitoring locations within the first zone are called “indicators.” Those within the second zone are called “controls.” The distinction between the two zones, depending on the type of sample or sample pathway, is based on one or more of several factors, such as site meteorological history, meteorological dispersion calculations, relative direction from the plant, river flow, and distance. Analysis of survey data from the two zones aids in determining if there is a significant difference between the two areas. It can also help in differentiating between radioactivity and radiation due to plant releases and that due to other fluctuations in the environment, such as atmospheric nuclear weapons test fallout or seasonal variations in the natural background.

4.2 Pathways Monitored

Four pathway categories are monitored by the REMP. They are the airborne, waterborne, ingestion and direct radiation pathways. Each of these four categories is monitored by the collection of one or more sample media, which are listed below, and are described in more detail in this section:

Airborne Pathway

- Air Particulate Sampling
- Charcoal Cartridge (Radioiodine) Sampling

Waterborne Pathways

- River Water Sampling
- Ground Water Sampling
- Sediment Sampling

Ingestion Pathways

- Milk Sampling
- Silage Sampling
- Mixed Grass Sampling
- Fish Sampling

Direct Radiation Pathway
TLD Monitoring

4.3 Descriptions of Monitoring Programs

4.3.1 Air Sampling

Continuous air samplers are installed at seven locations. (Five are required by the VYNPS ODCM.) The sampling pumps at these locations operate continuously at a flow rate of approximately one cubic foot per minute. Airborne particulates are collected by passing air through a 50 mm glass-fiber filter. A dry gas meter is incorporated into the sampling stream to measure the total volume of air sampled in a given interval. The entire system is housed in a weatherproof structure. The filters were collected on a weekly frequency and, to allow for the decay of radon daughter products, the analysis for gross beta radioactivity is delayed for more than 24 hours. The weekly filters were composited by location at the environmental laboratory for a quarterly gamma spectroscopy analysis.

If the gross-beta activity on an air particulate sample is greater than ten times the yearly mean of the control samples, ODCM Table 3.5.1, Note c, requires a gamma isotopic analysis on the sample. Whenever the main plant stack effluent release rate of I-131 is equal to or greater than 0.1 $\mu\text{Ci}/\text{sec}$, weekly air particulate collection from the plant stack is required by ODCM Table 3.5.1, Note h.

4.3.2 Charcoal Cartridge (Radioiodine) Sampling

Continuous air samplers are installed at seven locations. (Five are required by the ODCM Table 3.5.1.) The sampling pumps at these locations operate continuously at a flow rate of approximately one cubic foot per minute. A 60 cc TEDA-impregnated charcoal cartridge is located downstream of the air particulate filter described in Section 4.3.1 above. A dry gas meter is incorporated into the sampling stream to measure the total volume of air sampled in a given interval. The entire system is housed in a weatherproof structure. These cartridges are collected and analyzed weekly for I-131.

Whenever the main plant stack effluent release rate of I-131 is equal to or greater than 0.1 $\mu\text{Ci}/\text{sec}$, weekly charcoal cartridge collection is required, pursuant to ODCM Table 3.5.1, Note h.

4.3.3 River Water Sampling

An automatic compositing sampler is maintained at the downstream sampling location by the Vermont Yankee Chemistry Department staff. Normandeau Associates personnel maintain the pump that delivers river water to the sampler. The sampler is controlled by a timer that collects a frequent aliquot of river water. An additional grab sample is collected monthly at the upstream control location. Each sample is

analyzed for gamma-emitting radionuclides. Although not required by the VYNPS ODCM, a gross-beta analysis is also performed on each sample. The monthly composite and grab samples are composited by location by the contracted environmental laboratory for a quarterly tritium (H-3) analysis.

4.3.4 Ground Water (Deep Well Potable Water) Sampling

Grab samples are collected quarterly from four indicator locations and one control location. Only one indicator and one control are required by the VYNPS ODCM. Each sample is analyzed for gamma-emitting radionuclides and H-3. Although not required by the VYNPS ODCM, a gross-beta analysis is also performed on each sample.

4.3.5 Sediment Sampling

River sediment grab samples are collected semiannually from the downriver location and at the North Storm Drain Outfall by Normandeau Associates. Each sample is analyzed at an offsite environmental laboratory for gamma-emitting radionuclides.

4.3.6 Milk Sampling

When milk animals are identified as being on pasture feed (May through October), milk samples are collected twice per month from that location. Throughout the rest of the year, and for the full year where animals are not on pasture, milk samples are collected on a monthly schedule. Three locations are chosen as a result of the annual Land Use Census, based on meteorological dispersion calculations. The fourth location is a control, which is located sufficiently far away from the plant to be outside any potential plant influence. Other samples may be collected from locations of interest.

Immediately after collection, each milk sample is refrigerated and then shipped to the contracted environmental laboratory. Each sample is analyzed for gamma-emitting radionuclides. A separate low-level I-131 analysis is performed to meet the Lower Limit of Detection requirements in the ODCM. Although not required by the ODCM, Sr-89 and Sr-90 analyses are also performed on quarterly composited samples.

4.3.7 Silage (Chopped Corn or Grass) Sampling

Silage samples are collected at the milk sampling location at the time of harvest, if available. The silage from each location is shipped to the contracted environmental laboratory where it is analyzed for gamma-emitting radionuclides. Although not required by the ODCM, the silage samples are analyzed for low-level I-131.

4.3.8 Mixed Grass Sampling

At each air sampling station, a mixed grass sample is collected quarterly, when available. Enough grass is clipped to provide the minimal sample weight needed to achieve the required Lower Limit of Detection (LLD). The mixed grass samples are analyzed for gamma-emitting radionuclides. Although not required by the ODCM, the grass samples are analyzed for low-level I-131.

4.3.9 Fish Sampling

Fish samples are collected semiannually at two Connecticut River locations (upstream of the plant and in the Vernon Pond) by Normandeau Associates. The samples are frozen and delivered to the environmental laboratory where the edible portions are analyzed for gamma-emitting radionuclides.

4.3.10 TLD Monitoring

Direct gamma radiation exposure is continuously monitored with the use of thermoluminescent dosimeters (TLDs). Specifically, Panasonic UD-801AS1 and UD-814AS1 calcium sulfate dosimeters are used, with a total of five elements in place at each monitoring location. Each pair of dosimeters is sealed in a plastic bag, which is in turn housed in a plastic screen cylinder. This cylinder is attached to an object such as a fence or utility pole.

A total of 40 stations are required by the ODCM. Of these, 24 must be read out quarterly, while those from the remaining 16 incident response (outer ring) stations need only be de-dosed (annealed) quarterly, unless an ODCM gaseous release limit was exceeded during the period. Although not required by the ODCM, the TLDs from the 16 outer ring stations are read out quarterly along with the other stations' TLDs. In addition to the TLDs required by the ODCM, more than thirteen are typically posted at or near the site boundary. The plant staff posts and retrieves all TLDs, while the contracted environmental laboratory (AREVA NP Inc.) provides processing.

TABLE 4.1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

(as required by ODCM Table 3.5.1)*

Exposure Pathway and/or Sample Media	Collection			Analysis	
	Number of Sample Locations	Routine Sampling Mode	Collection Frequency	Analysis Type	Analysis Frequency
1. Direct Radiation (TLDs)	40	Continuous	Quarterly	Gamma dose; Outer Ring - dc-dose only, unless gaseous release Control was exceeded	Each TLD
2. Airborne (Particulates and Radioiodine)	5	Continuous	Weekly	Particulate Sample: Gross Beta	Each Sample
				Gamma Isotopic	Quarterly Composite (by location)
				Radioiodine Canister: I-131	Each Sample
3. Waterborne					
a. Surface water	2	Downstream. Automatic composite	Monthly	Gamma Isotopic Tritium (H-3)	Each Sample Quarterly Composite
b. Ground water	2	Upstream: grab Grab	Quarterly	Gamma Isotopic Tritium (H-3)	Each Sample Each Sample
c. Shoreline Sediment	2	Downstream: grab N. Storm Drain Outfall: grab	Semiannually	Gamma Isotopic	Each Sample

- See ODCM Table 3.5.1 for complete footnotes.

TABLE 4.1, cont.

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM
 (as required by ODCM Table 3.5.1)*

Exposure Pathway and/or Sample Media	Collection			Analysis	
	Nominal Number of Sample Locations	Routine Sampling Mode	Nominal Collection Frequency	Analysis Type	Analysis Frequency
4. Ingestion					
a. Milk	4	Grab	Monthly (Semimonthly when on pasture)	Gamma Isotopic 1-131	Each sample Each sample
b. Fish	2	Grab	Semiannually	Gamma Isotopic on edible portions	Each sample
c. Vegetation					
Grass sample	1 at each air sampling station	Grab	Quarterly when available	Gamma Isotopic	Each sample
Silage sample	1 at each milk sampling station	Grab	At harvest	Gamma Isotopic	Each sample

* See ODCM Table 3.5.1 for complete footnotes.

TABLE 4.2

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2008
VERMONT YANKEE NUCLEAR POWER STATION

<u>Exposure Pathway</u>	<u>Station Code</u>	<u>Station Description</u>	<u>Zone^(a)</u>	<u>Distance From Plant Stack (km)</u>	<u>Direction From Plant</u>
I. Airborne					
	AP/CF-11	River Sta. No. 3.3	I	1.9	SSE
	AP/CF-12	N. Hinsdale, NH	I	3.6	NNW
	AP/CF-13	Hinsdale Substation	I	3.1	E
	AP/CF-14	Northfield, MA	I	11.6	SSE
	AP/CF-15	Tyler Hill Road	I	3.1	WNW
	AP/CF-21	Spofford Lake	C	16.4	NNE
	AP/CF-40	Gov. Hunt House	I	--	On-site
2. Waterborne					
a. Surface					
	WR-11	River Sta. No. 3.3	I	1.9	SSE
	WR-21	Rt.9 Bridge	C	11.8	NNW
b. Ground					
	WG-11	Plant Well	I	0.2	On-site
	WG-12	Vernon Nursing Well	I	2.1	SSE
	WG-13	COB Well	I	0.3	On-site
	WG-14	Plant Support Bldg (PSB) Well	I	0.3	On-site
	WT-14	Test Well 201	I	--	On-site
	WT-16	Test Well 202	I	--	On-site
	WT-17	Test Well 203	I	--	On-site
	WT-18	Test Well 204	I	--	On-site
	WG-22	Copeland/Skibniowsky Well	C	13.7	N
c. Sediment					
	SE-11	Shoreline Downriver	I	0.6	SSE
	SE-12	North Storm Drain Outfall	I	0.1	E

TABLE 4.2, cont.

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2008
VERMONT YANKEE NUCLEAR POWER STATION

<u>Exposure Pathway</u>	<u>Station Code</u>	<u>Station Description</u>	<u>Zone^(a)</u>	<u>Distance From Plant Stack(km)</u>	<u>Direction From Plant Stack</u>
3. Ingestion					
a. Milk	TM-11	Miller Farm	I	0.8	W
	TM-14	Brown Farm	I	2.2	S
	TM-18	Blodgett Farm	I	3.6	SE
	TM-22	Franklin Farm	I	9.7	WSW
	TM-24	County Farm	C	21.6	N
b. Fish	FH-11	Vernon Pond	I	0.6 ^(b)	SSE
	FH-21	Rt.9 Bridge	C	11.8	NNW
c. Mixed Grass	TG-11	River Sta. No. 3.3	I	1.9	SSE
	TG-12	N. Hinsdale, NH	I	3.6	NNW
	TG-13	Hinsdale Substation	I	3.1	E
	TG-14	Northfield, MA	I	11.6	SSE
	TG-15	Tyler Hill Rd.	I	3.1	WNW
	TG-21	Spofford Lake	C	16.4	NNE
	TG-40	Gov. Hunt House	I	--	On-site
d. Silage	TC-11	Miller Farm	I	0.8	W
	TC-14	Brown Farm	I	2.2	S
	TC-18	Blodgett Farm	I	3.6	SE
	TC-22	Franklin Farm	I	9.7	WSW
	TC-24	County Farm	C	21.6	N

(a) I = Indicator Stations; C = Control Stations

(b) Fish samples are collected anywhere in Vernon Pond, which is adjacent to the plant (see Figure 4.1).

TABLE 4.3

**RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2008
VERMONT YANKEE NUCLEAR POWER STATION**

<u>Station Code</u>	<u>Station Description</u>	<u>Zone^(a)</u>	<u>Distance From Plant (km)^(d)</u>	<u>Direction From Plant^(d)</u>
DR-1	River Sta. No. 3.3	I	1.6	SSE
DR-2	N. Hinsdale, NH	I	3.9	NNW
DR-3	Hinsdale Substation	I	3.0	E
DR-4	Northfield, MA	C	11.3	SSE
DR-5	Spofford Lake	C	16.5	NNE
DR-6	Vernon School	I	0.52	WSW
DR-7	Site Boundary ^(c)	SB	0.28	W
DR-8	Site Boundary	SB	0.25	SSW
DR-9	Inner Ring	I	1.7	N
DR-10	Outer Ring	O	4.5	N
DR-11	Inner Ring	I	1.6	NNE
DR-12	Outer Ring	O	3.6	NNE
DR-13	Inner Ring	I	1.2	NE
DR-14	Outer Ring	O	3.9	NE
DR-15	Inner Ring	I	1.5	ENE
DR-16	Outer Ring	O	2.8	ENE
DR-17	Inner Ring	I	1.2	E
DR-18	Outer Ring	O	3.0	E
DR-19	Inner Ring	I	3.7	ESE
DR-20	Outer Ring	O	5.3	ESE
DR-21	Inner Ring	I	1.8	SE
DR-22	Outer Ring	O	3.3	SE
DR-23	Inner Ring	I	2.0	SSE
DR-24	Outer Ring	O	3.9	SSE
DR-25	Inner Ring	I	1.9	S
DR-26	Outer Ring	O	3.8	S
DR-27	Inner Ring	I	1.1	SSW
DR-28	Outer Ring	O	2.2	SSW
DR-29	Inner Ring	I	0.9	SW
DR-30	Outer Ring	O	2.4	SW

TABLE 4.3, cont.

**RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2008
VERMONT YANKEE NUCLEAR POWER STATION**

<u>Station Code</u>	<u>Station Description</u>	<u>Zone^(a)</u>	<u>Distance From Plant (km)^(d)</u>	<u>Direction From Plant^(d)</u>
DR-31	Inner Ring	I	0.71	WSW
DR-32	Outer Ring	O	5.1	WSW
DR-33	Inner Ring	I	0.66	WNW
DR-34	Outer Ring	O	4.6	W
DR-35	Inner Ring	I	1.3	WNW
DR-36	Outer Ring	O	4.4	WNW
DR-37	Inner Ring	I	2.8	NW
DR-38	Outer Ring	O	7.3	NW
DR-39	Inner Ring	I	3.1	NNW
DR-40	Outer Ring	O	5.0	NNW
DR-41 ^(b)	Site Boundary	SB	0.38	SSW
DR-42 ^(b)	Site Boundary	SB	0.59	S
DR-43 ^(b)	Site Boundary	SB	0.44	SSE
DR-44 ^(b)	Site Boundary	SB	0.19	SE
DR-45 ^(b)	Site Boundary	SB	0.12	NE
DR-46 ^(b)	Site Boundary	SB	0.28	NNW
DR-47 ^(b)	Site Boundary	SB	0.50	NNW
DR-48 ^(b)	Site Boundary	SB	0.82	NW
DR-49 ^(b)	Site Boundary	SB	0.55	WNW
DR-50 ^(b)	Gov. Hunt House	I	0.35	SSW
DR-51 ^(b)	Site Boundary	SB	0.26	W
DR-52 ^(b)	Site Boundary	SB	0.24	SW
DR-53 ^(b)	Site Boundary	SB	0.21	WSW

- (a) I = Inner Ring TLD; O = Outer Ring Incident Response TLD; C = Control TLD; SB = Site Boundary TLD.
- (b) This location is not considered a requirement of ODCM Table 3.5.1.
- (c) DR-7 satisfies ODCM Table 3.5.1 for an inner ring direct radiation monitoring location. However, it is averaged as a Site Boundary TLD due to its close proximity to the plant.
- (d) Distance and direction is relative to the center of the Turbine Building for direct radiation monitors.

**TABLE 4.4
ENVIRONMENTAL LOWER LIMIT OF DETECTION (LLD) SENSITIVITY REQUIREMENTS**

Analysis	Water (pCi/l)	Airborne Particulates or Gases (pCi/m ³)	Fish (pCi/Kg)	Milk (pCi/l)	Vegetation (pCi/Kg)	Sediment (pCi/Kg - dry)
Gross-Beta	4	0.01				
H-3	3000					
Mn-54	15		130			
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131		0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

See ODCM Table 4.5.1 for explanatory footnotes

TABLE 4.5

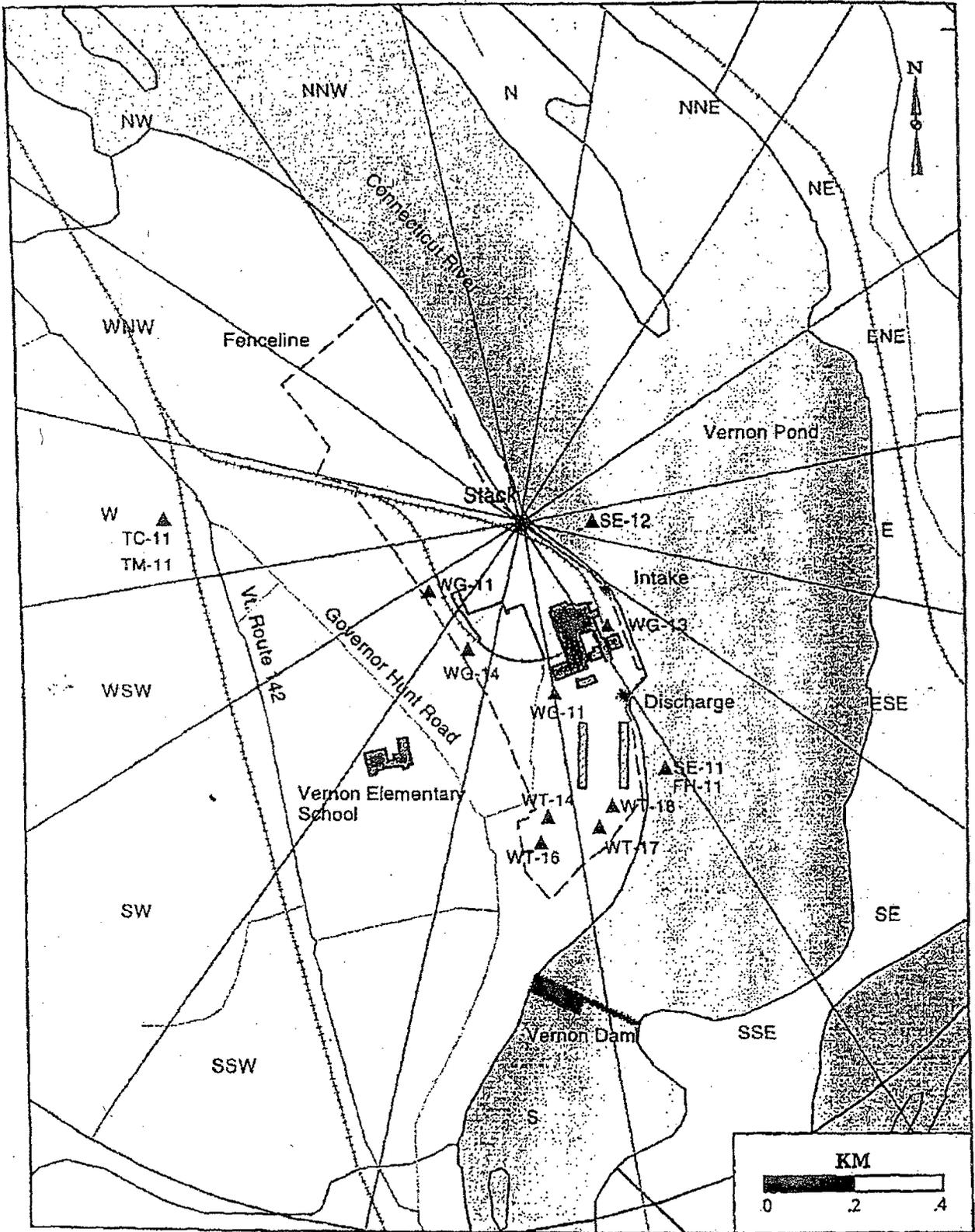
**REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS
IN ENVIRONMENTAL SAMPLES**

Analysis	Water (pCi/l)	Airborne Particulates or Gases (pCi/m ³)	Fish (pCi/Kg)	Milk (pCi/l)	Food Product (pCi/Kg)	Sediment (pCi/Kg-dry)
H-3	20,000 ^(a)					
Mn-54	1000		30,000			
Fe-59	400		10,000			
Co-58	1000		30,000			
Co-60	300		10,000			3000 ^(b)
Zn-65	300		20,000			
Zr-Nb-95	400					
I-131		0.9		3	100	
Cs-134	30	10	1000	60	1000	
Cs-137	50	20	2000	70	2000	
Ba-La-140	200			300		

(a) Reporting Level for drinking water pathways. For non-drinking water, a value of 30,000 pCi/liter may be used.

(b) Reporting Level for grab samples taken at the North Storm Drain Outfall only.

See ODCM Table 3.5.2 for additional explanatory footnotes.



**Figure 4-1 Environmental Sampling Locations
in Close Proximity to the Plant**

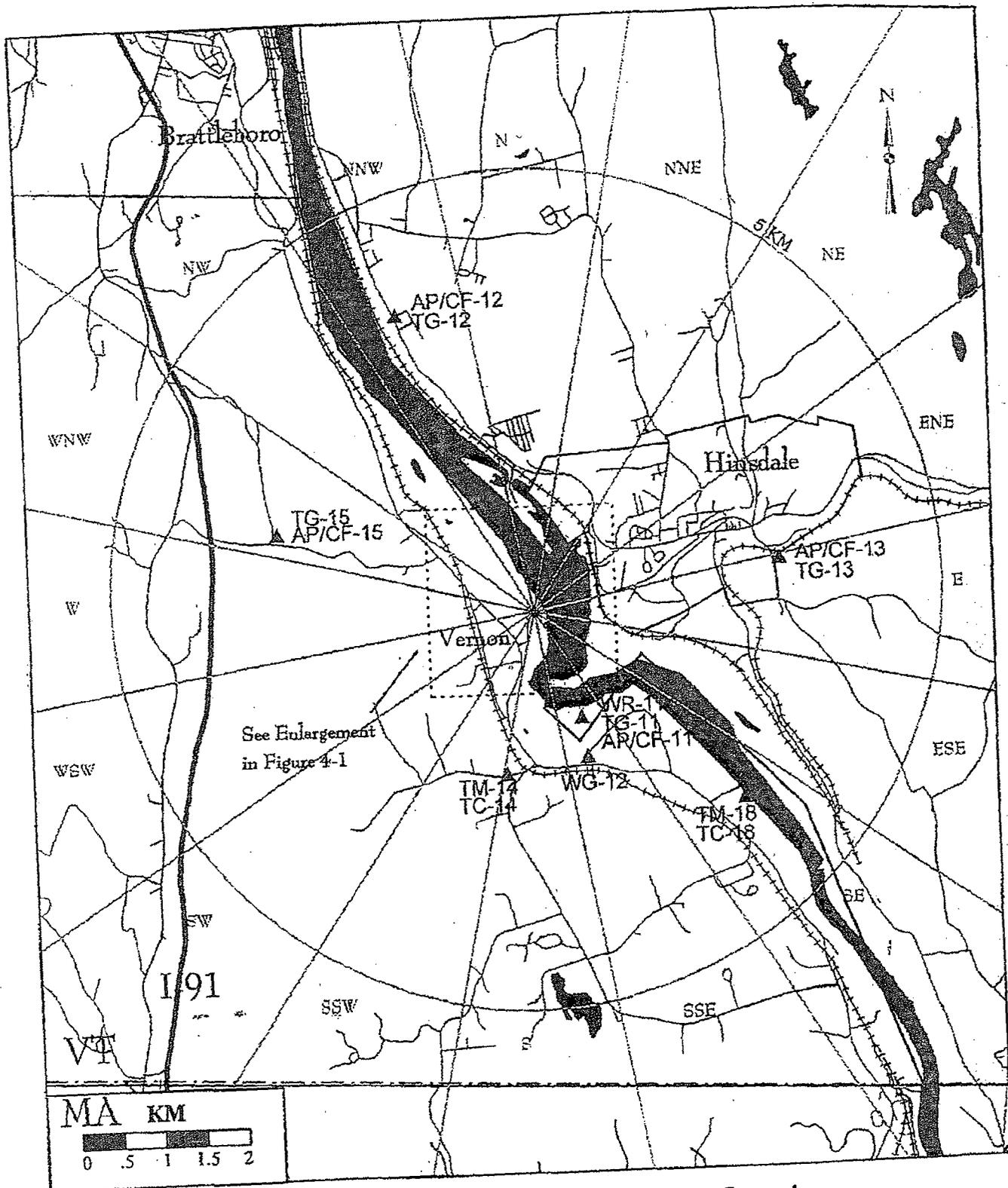


Figure 4-2 Environmental Sampling Locations

Within 5 Km of Plant

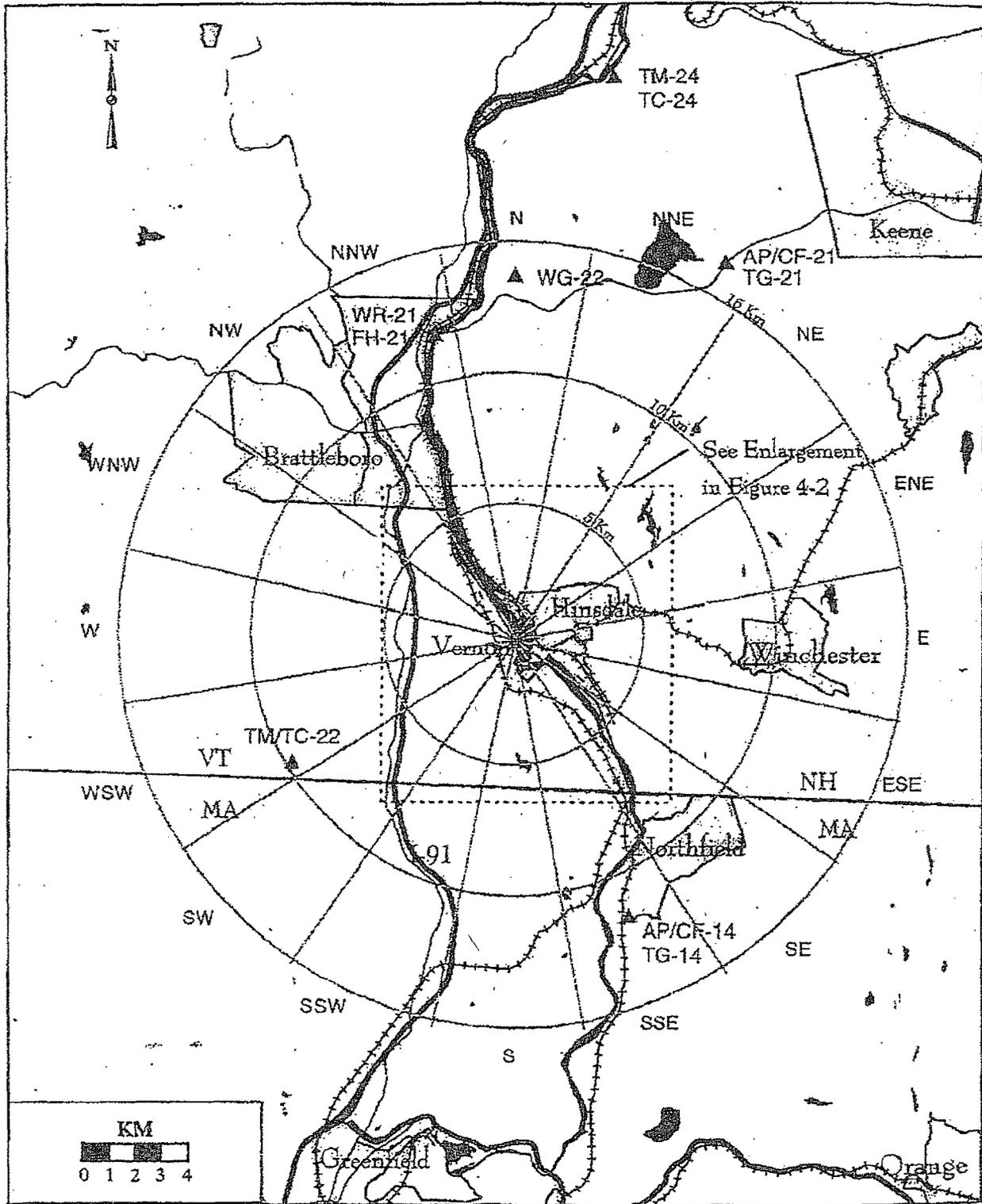


Figure 4-3 Environmental Sampling Locations

Greater than 5 Km from Plant

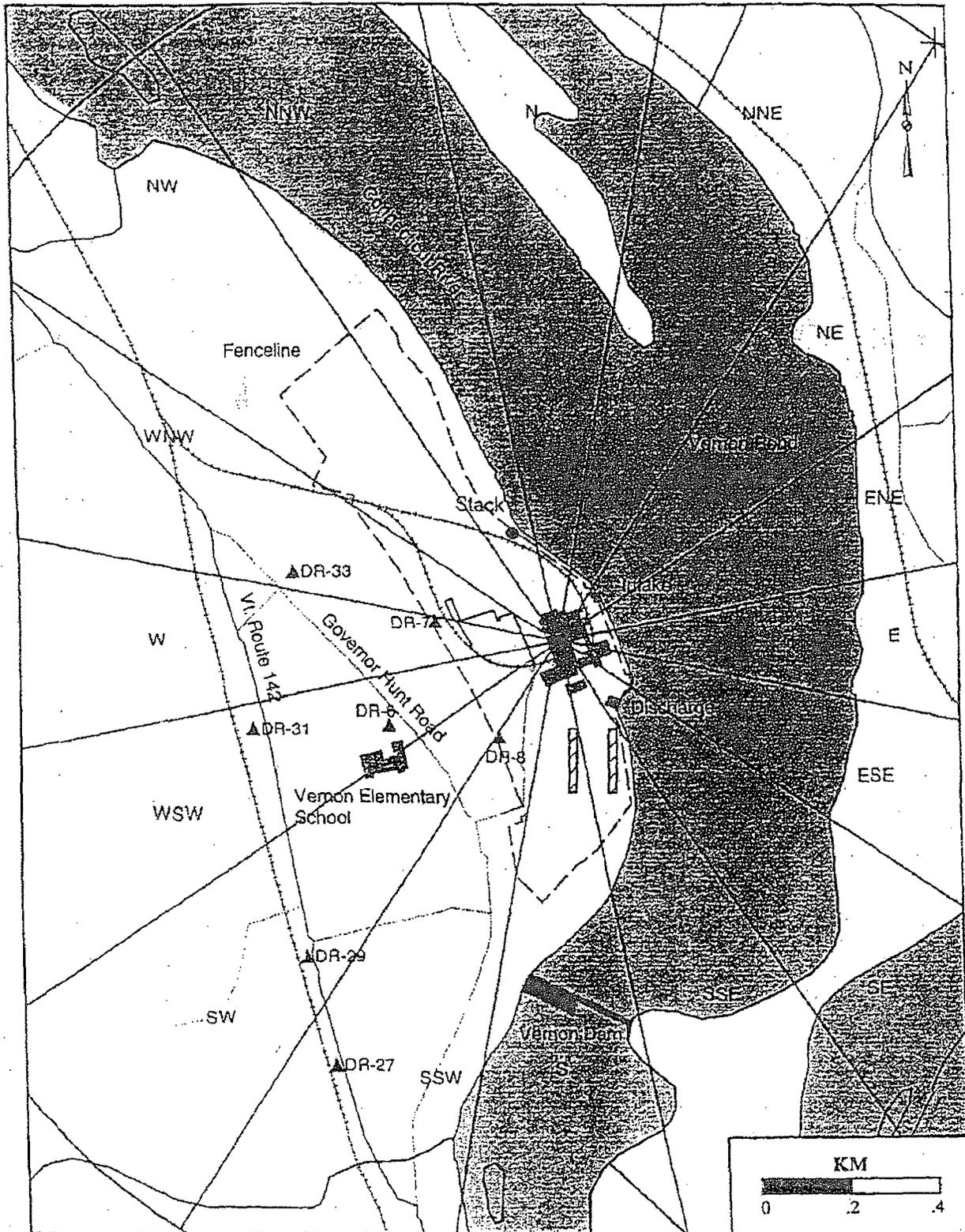


Figure 4-4 TLD Locations in Close Proximity to the Plant

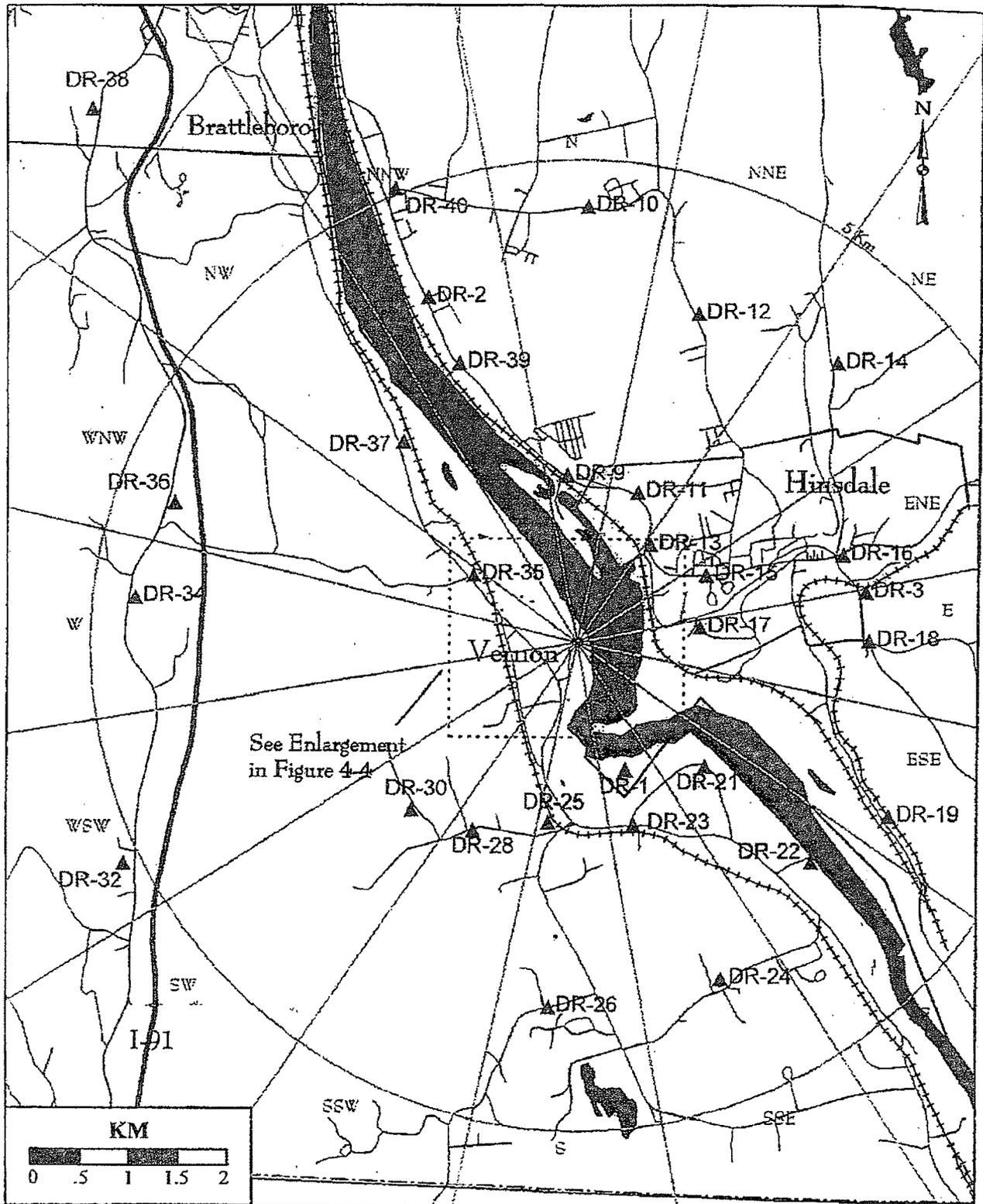


Figure 4-5 TLD Locations Within 5 Km of Plant

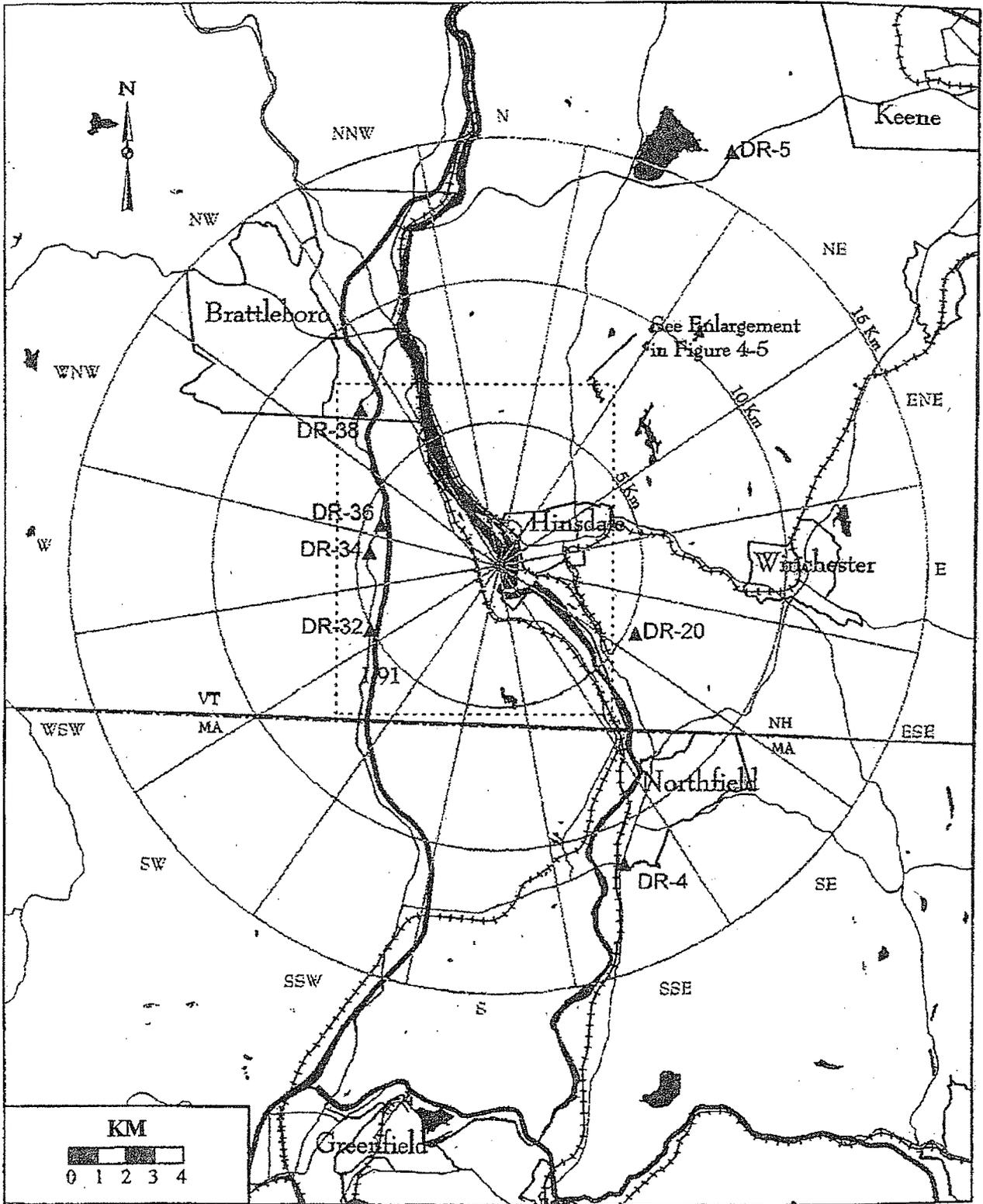


Figure 4-6 TLD Locations Greater Than 5 Km from Plant

5. RADIOLOGICAL DATA SUMMARY TABLES

This section summarizes the analytical results of the environmental samples that were collected during 2008. These results, shown in Table 5.1, are presented in a format similar to that prescribed in the NRC's Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 1). The results are ordered by sample media type and then by radionuclide. The units for each media type are also given.

In 2008, Vermont Yankee contracted with one laboratory for primary analyses of the environmental samples. A second laboratory was used to cross-check the first laboratory for selected samples.

The left-most column of Table 5.1 contains the radionuclide of interest, the total number of analyses for that radionuclide in 2008 and the number of measurements which exceeded the Reporting Levels found in Table 3.5.2 of the VYNPS Off-site Dose Calculation Manual. The latter are classified as "Non-routine" measurements. The second column lists the required Lower Limit of Detection (LLD) for those radionuclides that have detection capability requirements as specified in the ODCM Table 4.5.1. The absence of a value in this column indicates that no LLD is specified in the ODCM for that radionuclide in that media. The target LLD for any analysis is typically 50 percent of the most restrictive required LLD. Occasionally the required LLD may not be met. This may be due to malfunctions in sampling equipment or lack of sufficient sample quantity which would then result in low sample volume. Delays in analysis at the laboratory could also be a factor. Such cases, if and when they should occur, would be addressed in Section 6.2.

For each radionuclide and media type, the remaining three columns summarize the data for the following categories of monitoring locations: (1) the Indicator stations, which are within the range of influence of the plant and which could be affected by its operation; (2) the Control stations, which are beyond the influence of the plant; and (3) the station which had the highest mean concentration during 2008 for that radionuclide. Direct radiation monitoring stations (using TLDs) are grouped into Inner Ring, Outer ring, Site Boundary and Control.

In each of these columns, for each radionuclide, the following statistical values are given:

- The mean value of all concentrations, including those results that are less than the *a posteriori* LLD for that analysis.
- The minimum and maximum concentration, including those results that are less than the *a posteriori* LLD. In previous years, data less than the *a posteriori* LLD were converted to zero for purposes of reporting the means and ranges.

- The “Number Detected” is the number of positive measurements. A measurement is considered positive when the concentration is greater than three times the standard deviation in the concentration and greater than or equal to the *a posteriori* LLD (Minimum Detectable Concentration or MDC).
- The “Total Analyzed” for each column is also given.

Each single radioactivity measurement datum in this report is based on a single measurement of a sample. Any concentration below the *a posteriori* LLD for its analysis is averaged with those values above the *a posteriori* LLD to determine the average of the results. Likewise, the values are reported in ranges even though they are below the *a posteriori* LLD. To be consistent with normal data review practices used by Vermont Yankee, a “positive measurement” is considered to be one whose concentration is greater than three times its associated standard deviation, is greater than or equal to the *a posteriori* LLD and satisfies the analytical laboratory’s criteria for identification.

The radionuclides reported in this section represent those that: 1) had an LLD requirement in Table 4.5.1 of the ODCM, or a Reporting Level listed in Table 3.5.2 of the ODCM, or 2) had a positive measurement of radioactivity, whether it was naturally-occurring or man-made; or 3) were of special interest for any other reason. The radionuclides routinely analyzed and reported by the environmental laboratory (in a gamma spectroscopy analysis) were: Th-232, Ba/La-140, Be-7, Co-58, Co-60, Cs-134, Cs-137, Fe-59, K-40, Mn-54, Zn-65 and Zr-95.

Data from direct radiation measurements made by TLDs are provided in Table 5.2. The complete listing of quarterly TLD data is provided in Table 5.3.

Radiological Environmental Program Summary
2008 Radiological Environmental Operating Report
Vermont Yankee

Table 5.1:

Sample Medium:	Air Particulate (AP)
Sample Medium:	Charcoal Cartridge (CF)
Sample Medium:	River Water (WR)
Sample Medium:	Ground Water (WG)
Sample Medium:	Sediment (SE)
Sample Medium:	Test Well (WT)
Sample Medium:	Shoreline Well (WS)
Sample Medium:	Milk (TM)
Sample Medium:	Silage (TC)
Sample Medium:	Mixed Grass (TG)
Sample Medium:	Fish (FH)

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER: 50-271					
Location of Facility: VERNON, VT				REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN			
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	CONTROL MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS	
AIR PARTICULATE (PCI/CU.METER)	GROSS BETA	371	0.01	0.0108 (318/318) (0.0030/0.0240)	0.0104 (53/53) (0.0030/0.0180)	0.0112 (53/53) (0.0040/0.0230)	13 INDICATOR HINSDALE SUBSTATION 3.1 MILES E OF SITE	0	
	GAMMA BE-7	28	N/A	0.1073 (24/24) (0.1497/0.2400)	0.1022 (4/4) (0.0493/0.1421)	0.1174 (4/4) (0.1013/0.1358)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0	
	K-40		N/A	0.0436 (8/24) (<0.0079/0.1299)	0.0527 (2/4) (<0.0083/0.1063)	0.0683 (2/4) (<0.0210/0.1187)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0	
	CS-134		0.05	0.0028 (0/24) (<0.0019/<0.0047)	0.0030 (0/4) (<0.0026/<0.0034)	0.0030 (0/4) (<0.0022/<0.0047)	15 INDICATOR TYLER HILL ROAD 3.1 MILES WNW OF SITE	0	
	CS-137		0.06	0.0022 (0/24) (<0.0012/<0.0032)	0.0022 (0/4) (<0.0014/<0.0030)	0.0025 (0/4) (<0.0018/<0.0031)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0	
	RA-226		N/A	0.0303 (0/24) (<0.0188/<0.0456)	0.0287 (0/4) (<0.0176/<0.0387)	0.0345 (0/4) (<0.0229/<0.0456)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0	
	AC/TH-228		N/A	0.0079 (0/24) (<0.0020/<0.0132)	0.0078 (0/4) (<0.0061/<0.0087)	0.0096 (0/4) (<0.0062/<0.0132)	15 INDICATOR TYLER HILL ROAD 3.1 MILES WNW OF SITE	0	
	AIR IODINE (PCI/CU.METER)	I-131	371	0.07	0.0377 (0/318) (<0.0079/<0.0693)	0.0414 (0/53) (<0.0221/<0.0650)	0.0414 (0/53) (<0.0221/<0.0650)	21 CONTROL SPOFFORD LAKE 16.4 MILES NNE OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		LOCATION WITH HIGHEST ANNUAL MEAN	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
Location of Facility: VERNON, VT				REPORTING PERIOD:		2008			
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION		
RIVER WATER (PCI/LITER)	GROSS BETA	24	4	1.63 (12/12) (0.700/4.50)	1.51 (10/12) (0.900/2.40)	1.63 (12/12) (0.700/4.50)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0	
	TRITIUM	8	3000	432 (0/4) (<413/<458)	432 (0/4) (<413/<458)	432 (0/4) (<413/<458)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0	
* Stations 11 and 21 have the same average.									
	GAMMA MN-54	24	15	2.82 (0/12) (<1.57/<4.76)	4.87 (0/12) (<3.01/<6.43)	4.87 (0/12) (<3.01/<6.43)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0	
	CO-58		15	2.96 (0/12) (<1.76/<4.48)	5.44 (0/12) (<3.26/<8.13)	5.44 (0/12) (<3.26/<8.13)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0	
	FE-59		30	7.92 (0/12) (<5.18/<11.3)	13.9 (0/12) (<7.51/<20.6)	13.9 (0/12) (<7.51/<20.6)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0	
	CO-60		15	2.77 (0/12) (<1.58/<5.12)	5.71 (0/12) (<3.01/<8.91)	5.71 (0/12) (<3.01/<8.91)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0	
	ZN-65		30	5.23 (0/12) (<1.92/<11.4)	12.9 (0/12) (<5.38/<24.1)	12.9 (0/12) (<5.38/<24.1)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0	
	ZR-95		15	5.22 (0/12) (<3.11/<7.89)	8.79 (0/12) (<5.73/<14.7)	8.79 (0/12) (<5.73/<14.7)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0	

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER: 50-271				
Location of Facility: VERNON, VT				REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
RIVER WATER (PCI/LITER)	I-131		15	10.6 (0/12) (<6.74/<14.4)	6.95 (0/12) (<3.99/<9.69)	10.6 (0/12) (<6.74/<14.4)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0
	CS-134		15	2.48 (0/12) (<1.21/<4.31)	4.82 (0/12) (<3.02/<7.68)	4.82 (0/12) (<3.02/<7.68)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CS-137		18	2.66 (0/12) (<1.61/<3.79)	5.28 (0/12) (<2.83/<8.68)	5.28 (0/12) (<2.83/<8.68)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	BA-LA-140		15	7.52 (0/12) (<4.70/<14.7)	8.02 (0/12) (<3.46/<12.6)	8.02 (0/12) (<3.46/<12.6)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	RA-226		N/A	96.3 (5/12) (65.1/<135)	109 (4/12) (51.3/<174)	109 (4/12) (51.3/<174)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
GROUND WATER (PCI/LITER)	GROSS BETA	20	4	3.36 (16/16) (1.50/6.20)	1.55 (4/4) (0.900/1.90)	5.45 (4/4) (4.90/6.20)	13 INDICATOR COB WELL 0.3 MILES ON-SITE	0
	TRITIUM*	20	3000	436 (0/16) (<408/<452)	436 (0/4) (<408/<452)	437 (0/16) (<411/<452)	13 INDICATOR COB WELL 0.3 MILES ON-SITE	0
	I-131	20	1	0.545 (0/16) (<0.370/<0.736)	0.535 (0/4) (<0.422/<0.671)	0.569 (0/4) (<0.414/<0.736)	11 INDICATOR PLANT WELL 0.2 MILES ON-SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT		DOCKET NUMBER: 50-271		REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN		
Location of Facility: VERNON, VT				INDICATOR	CONTROL			
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
GROUND WATER (PCI/LITER)	GAMMA MN-54	20	15	6.17 (0/16) (<3.89/<9.73)	5.92 (0/4) (<4.65/<7.60)	6.95 (0/4) (<5.15/<8.50)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
	CO-58		15	5.41 (0/16) (<3.21/<9.85)	6.68 (0/4) (<4.77/<9.21)	6.68 (0/4) (<4.77/<9.21)	22 CONTROL SKIBNIEWSKY WELL 13.7 MILES N OF SITE	0
	FE-59		30	15.3 (0/16) (<10.8/<22.6)	15.4 (0/4) (<9.37/<20.8)	17.4 (0/4) (<10.9/<22.6)	11 INDICATOR PLANT WELL 0.2 MILES ON-SITE	0
	CO-60		15	6.85 (0/16) (<4.49/<10.3)	6.35 (0/4) (<4.70/<9.74)	7.90 (0/4) (<5.29/<9.10)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
	ZN-65		30	9.12 (0/16) (<6.77/<14.0)	10.2 (0/4) (<6.05/<14.6)	10.2 (0/4) (<6.05/<14.6)	22 CONTROL SKIBNIEWSKY WELL 13.7 MILES N OF SITE	0
	ZR-95		15	11.0 (0/16) (<7.57/<14.5)	10.3 (0/4) (<7.78/<12.8)	12.7 (0/4) (<8.33/<14.5)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
	CS-134		15	6.02 (0/16) (<3.48/<9.19)	4.94 (0/4) (<3.33/<5.55)	7.70 (0/4) (<5.54/<9.19)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
	CS-137		18	4.95 (0/16) (<3.08/<6.78)	5.90 (0/4) (<2.65/<9.52)	5.90 (0/4) (<2.65/<9.52)	22 CONTROL SKIBNIEWSKY WELL 13.7 MILES N OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271			
Location of Facility: VERNON, VT				REPORTING PERIOD:		2008			
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN			
				LOCATIONS MEAN (F) RANGE	LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS	
GROUND WATER (PCI/LITER)	BA-LA-140		15	8.21 (0/16) (<6.37/<11.3)	9.14 (0/4) (<5.45/<14.8)	9.14 (0/4) (<5.45/<14.8)	22	CONTROL SKIBNIOWSKY WELL 13.7 MILES N OF SITE	0
	RA-226		N/A	169 (6/16) (79.9/<277)	137 (2/4) (<125/<147)	212 (0/4) (<148/<277)	11	INDICATOR PLANT WELL 0.2 MILES ON-SITE	0
SEDIMENT (PCI/KG DRY)	GAMMA BE-7	36	N/A	840 (1/34) (<404/<1190)	613 (0/2) (<485/<741)	1070 (0/2) (<1070/<1070)	24	INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
			N/A	16807 (34/34) (8940/22200)	11075 (2/2) (9050/13100)	20350 (2/2) (19000/21700)	12	INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	MN-54		N/A	72.2 (0/34) (<41.5/<93.9)	51.4 (0/2) (<45.9/<56.8)	89.3 (0/2) (<85.0/<93.6)	24	INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	CO-60		N/A	68.6 (0/34) (<32.1/<93.0)	50.8 (0/2) (<39.1/<62.5)	90.8 (0/2) (<88.5/93.0)	13	INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
NB-95		N/A	101 (0/34) (<48.1/<133)	76.2 (0/2) (<56.1/<96.3)	128 (0/2) (<123/<132)	24	INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0	
CS-134		150	61.3 (0/34) (<31.2/<74.8)	42.5 (0/2) (<36.1/<48.8)	74.8 (0/2) (<74.7/<74.8)	13	INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0	

* Stations 12, 19 and 24 have the same average.

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2008		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN		
				LOCATIONS	LOCATION	MEAN	STATION #	NUMBER OF
				MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	NAME DISTANCE AND DIRECTION	NONROUTINE REPORTED MEASUREMENTS
SEDIMENT (PCI/KG DRY)	CS-137		180	126 (24/34) (<45.2/224)	54.5 (0/2) (<39.0/70.0)	195 (2/2) (165/224)	24 INDICATOR DOWNSTREAM RIVER STATION (3-3) 1.9 MILES SSE OF SITE	0
	BA-LA-140		N/A	436 (0/34) (<171/<888)	386 (0/2) (<243/<529)	655 (0/2) (<422/<888)	13 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	RA-226		N/A	2010 (18/34) (<677/3270)	1521 (1/2) (<771/2270)	3030 (2/2) (2790/3270)	24 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	AC-228		N/A	1269 (14/34) (<199/4040)	255 (0/2) (<194/<315)	2342 (1/2) (<643/4040)	24 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	TH-228		N/A	1283 (34/34) (546/1750)	902 (2/2) (874/929)	1645 (2/2) (1540/1750)	12 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	TH-232		N/A	1181 (34/34) (527/1580)	773 (2/2) (767/779)	1570 (2/2) (1560/1580)	12 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	U-238		N/A	7561 (0/34) (<3770/<9920)	4935 (0/2) (<4430/<5440)	9285 (0/2) (<8650/<9920)	13 INDICATOR TEST WELL 204 ON-SITE	0
TEST WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	GROSS BETA	16	4	10.7 (16/16) (2.89/22.2)	N/A	17.2 (4/4) (11.4/22.2)	14 INDICATOR TEST WELL 201 ON-SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER: 50-271					
Location of Facility: VERNON, VT				REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN			
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS	
TEST WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	TRITIUM	16	3000	281 (0/8) (<212/<537)	N/A	326 (0/4) (<229/<537)	17 INDICATOR TEST WELL 203 ON-SITE	0	
	GAMMA K-40	16	N/A	57.5 (8/16) (<6.83/137)	N/A	67.7 (2/4) (<24.5/96.0)	16 INDICATOR TEST WELL 202 ON-SITE	0	
	MN-54		15	1.87 (0/16) (<0.735/<4.18)	N/A	2.01 (0/4) (<0.911/<4.15)	17 INDICATOR TEST WELL 203 ON-SITE	0	
	CO-58		15	1.97 (0/16) (<0.772/<4.16)	N/A	2.20 (0/4) (<1.00/<4.16)	16 INDICATOR TEST WELL 202 ON-SITE	0	
	FE-59		30	4.41 (0/16) (<1.66/<9.27)	N/A	4.78 (0/4) (<1.99/<8.68)	16 INDICATOR TEST WELL 202 ON-SITE	0	
	CO-60		15	1.97 (0/16) (<0.738/<4.53)	N/A	2.13 (0/4) (<1.19/<4.31)	17 INDICATOR TEST WELL 203 ON-SITE	0	
	NB-95		15	2.17 (0/16) (<0.822/<4.94)	N/A	2.32 (0/4) (<1.02/<4.46)	16 INDICATOR TEST WELL 202 ON-SITE	0	
	I-131		15	5.84 (0/16) (<1.92/<7.25)	N/A	6.23 (0/4) (<5.43/<7.14)	16 INDICATOR TEST WELL 202 ON-SITE	0	

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2008		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN		
				LOCATIONS	LOCATION	MEAN	STATION #	NUMBER OF
				MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	NAME DISTANCE AND DIRECTION	REPORTED MEASUREMENTS
TEST WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	CS-134		15	1.68 (0/16) (<0.724/<3.65)	N/A	1.81 (0/4) (<0.826/<3.61)	17 INDICATOR TEST WELL 203 ON-SITE	0
	CS-137		18	1.97 (0/16) (<0.806/<4.62)	N/A	2.21 (0/4) (<0.930/<4.58)	16 INDICATOR TEST WELL 202 ON-SITE	0
	BA-LA-140		15	4.74 (0/16) (<1.43/<7.40)	N/A	5.20 (0/4) (<3.41/<7.40)	17 INDICATOR TEST WELL 203 ON-SITE	0
SHORELINE WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	GROSS BETA	12	4	8.01 (12/12) (4.64/15.1)	N/A	10.4 (4/4) (5.70/15.1)	GZ-3 INDICATOR SHORELINE WELL ON-SITE	0
	TRITIUM	12	3000	421 (0/12) (<243/<1130)	N/A	485 (0/4) (<243/<1130)	GZ-3 INDICATOR SHORELINE WELL ON-SITE	0
	GAMMA K-40	12	N/A	91.0 (11/12) (<8.79/178)	N/A	96.7 (0/4) (<47.6/131)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	MN-54		15	1.95 (0/12) (<0.721/<5.32)	N/A	2.23 (0/4) (<0.827/<5.32)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	CO-58		15	2.05 (0/12) (<0.807/<5.68)	N/A	2.40 (0/4) (<0.981/<5.68)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2008		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN		
				LOCATIONS	LOCATION	MEAN	STATION #	NUMBER OF
				MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	NAME DISTANCE AND DIRECTION	NONROUTINE REPORTED MEASUREMENTS
SHORELINE WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	FE-59		30	4.47 (0/12) (<1.89/<10.7)	N/A	4.94 (0/4) (<2.36/<10.7)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	CO-60		15	1.78 (0/12) (<0.692/<3.99)	N/A	1.82 (0/4) (<0.722/<3.80)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	NB-95		15	2.26 (0/12) (<0.958/<5.65)	N/A	2.48 (0/4) (<1.09/<5.65)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	I-131		15	5.92 (0/12) (<3.82/<7.37)	N/A	6.26 (0/4) (<5.32/<7.37)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	CS-134		15	1.78 (0/12) (<0.666/<4.54)	N/A	1.99 (0/4) (<0.718/<4.54)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	CS-137		18	2.01 (0/12) (<0.706/<5.13)	N/A	2.23 (0/4) (<0.916/<5.13)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
	BA-LA-140		15	4.17 (0/12) (<2.83/<7.17)	N/A	4.64 (0/4) (<3.04/<7.17)	GZ-1 INDICATOR SHORELINE WELL ON-SITE	0
MILK (PCI/LITER)	I-131	90	1	0.557 (0/72) (<0.385/<0.875)	0.564 (0/18) (<0.499/<0.656)	0.640 (0/18) (<0.493/<0.875)	I1 INDICATOR MILLER FARM 0.8 MILES W OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER: 50-271				
Location of Facility: VERNON, VT				REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
MILK (PCI/LITER)	SR-89	24	N/A	7.07 (0/20) (<3.92/<9.56)	7.22 (0/4) (<5.32/<8.75)	7.74 (0/4) (<5.07/<9.56)	11 INDICATOR MILLER FARM 0.8 MILES W OF SITE	0
	SR-90	24	N/A	1.62 (12/20) (<0.699/3.54)	1.41 (3/4) (<0.788/2.11)	2.15 (3/4) (1.18/3.54)	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	GAMMA BE-7	90	N/A	63.3 (0/72) (<36.2/<112)	63.0 (0/18) (<40.5/<91.3)	72.7 (0/18) (<48.2/<104)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0
	K-40		N/A	1654 (72/72) (1262/2589)	1600 (18/18) (1398/1978)	1783 (18/18) (1279/2480)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0
	CS-134		15	7.41 (0/72) (<3.37/<12.8)	7.78 (0/18) (<4.18/<12.2)	8.87 (0/18) (<4.45/<12.3)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0
	CS-137		18	7.93 (0/72) (<4.62/<13.7)	7.78 (0/18) (<5.02/<10.2)	9.21 (0/18) (<6.16/<13.7)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0
	BA-LA140		15	8.97 (0/72) (<1.71/<14.7)	9.22 (0/18) (<5.32/<14.7)	10.5 (0/18) (<6.47/<14.6)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0
	RA-226		N/A	166 (17/72) (88.3/<274)	166 (5/18) (89.7/<268)	181 (2/18) (121/<255)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER: 50-271						
Location of Facility: VERNON, VT				REPORTING PERIOD: 2008						
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN				
				LOCATIONS	LOCATION	MEAN	STATION #	NUMBER OF		
				MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	NAME DISTANCE AND DIRECTION	NONROUTINE REPORTED MEASUREMENTS		
MILK (PCI/LITER)	AC-TH228		N/A	29.5 (2/72) (<16.8/<49.7)	28.5 (0/18) (<19.5/<38.5)	35.1 (1/18) (<24.5/<48.5)	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0		
SILAGE (PCI/KG)	I-131	5	60	37.1 (0/4) (<29.0/<53.3)	45.9 (0/1) N/A	53.3 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0		
	GAMMA BE-7	5	N/A	1530 (4/4) (586/4180)	847 (1/1) N/A	4180 (1/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0		
	K-40		N/A	8626 (4/4) (3315/20520)	7500 (1/1) N/A	20520 (1/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0		
	CS-134		60	40.0 (0/4) (<25.0/<58.1)	54.5 (0/1) N/A	58.1 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0		
	CS-137		80	41.4 (0/4) (<29.2/<58.7)	51.1 (0/1) N/A	58.7 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0		
	RA-226		N/A	697 (4/4) (406/1413)	717 (0/1) N/A	1410 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0		
	AC-TH228		N/A	143 (0/4) (<105/<173)	170 (0/1) N/A	173 (0/1) N/A	14 INDICATOR BROWN FARM 2.2 MILES S OF SITE	0		

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THE VERMONT YANKEE NUCLEAR POWER PLANT, 2008**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
MIXED GRASS (PCI/KG)	I-131	21	60	38.2 (0/18) (<20.3/<59.5)	37.0 (0/3) (<29.7/<50.1)	44.4 (0/3) (<28.3/<58.2)	12 INDICATOR N. HINSDALE, NH 3.6 MILES NNW OF SITE	0
	GAMMA BE-7	21	N/A	2548 (17/18) (<230/7456)	2415 (3/3) (587/5720)	3217 (3/3) (451/6955)	12 INDICATOR N. HINSDALE, NH 3.6 MILES NNW OF SITE	0
	K-40		N/A	6724 (18/18) (3928/10810)	5712 (3/3) (4125/7488)	7958 (3/3) (6020/9824)	40 INDICATOR GOV. HUNT HOUSE ON-SITE	0
	CS-134		60	39.0 (0/18) (<21.2/<55.5)	41.0 (0/3) (<33.0/<51.0)	47.1 (0/3) (<42.9/<54.8)	13 INDICATOR HINSDALE SUBSTATION 3.1 MILES E F SITE	0
	CS-137		80	35.8 (0/18) (<21.1/<50.9)	32.8 (0/3) (<29.7/<34.5)	42.3 (0/3) (<25.9/<50.9)	12 INDICATOR N. HINSDALE, NH 3.6 MILES NNW OF SITE	0
	RA-226		N/A	668 (9/18) (352/1520)	636 (2/3) (<483/777)	830 (3/3) (352/1520)	40 INDICATOR GOV. HUNT HOUSE ON-SITE	0
	AC-TH228		N/A	148 (3/18) (<67.3/246)	113 (0/3) (<87.5/<129)	171 (1/3) (<134/<244)	15 INDICATOR TYLER HILL ROAD 3.1 MILES WNW OF SITE	0
FISH (PCI/KG)	GAMMA K-40	4	N/A	5562 (2/2) (3885/7238)	4157 (2/2) (3871/4442)	5562 (2/2) (3885/7238)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0

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Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT			DOCKET NUMBER: 50-271					
Location of Facility: VERNON, VT			REPORTING PERIOD: 2008		LOCATION WITH HIGHEST ANNUAL MEAN			
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
FISH (PCI/KG)	MN-54		130	51.4 (0/2) (<41.0/<61.8)	60.6 (0/2) (<48.1/<73.0)	60.6 (0/2) (<48.1/<73.0)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CO-58		130	45.3 (0/2) (<38.6/<52.0)	52.7 (0/2) (<44.0/<61.4)	52.7 (0/2) (<44.0/<61.4)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	FE-59		260	154 (0/2) (<141/<166)	174 (0/2) (<159/<189)	174 (0/2) (<159/<189)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CO-60		130	54.4 (0/2) (<42.6/<66.2)	60.6 (0/2) (<57.9/<63.4)	60.6 (0/2) (<57.9/<63.4)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	ZN-65		260	117 (0/2) (<93.2/<141)	149 (0/2) (<146/<152)	149 (0/2) (<146/<152)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CS-134		130	53.3 (0/2) (<37.2/<69.4)	60.4 (0/2) (<45.0/<75.8)	60.4 (0/2) (<45.0/<75.8)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CS-137		150	46.3 (0/2) (<35.8/<56.8)	52.9 (0/2) (<44.4/<61.4)	52.9 (0/2) (<44.4/<61.4)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
DIRECT RADIATION (MILLI-ROENTGEN/STD.MO.)	TLD-QUARTERLY	157	N/A	6.65 (149/149) (4.61/9.43)	6.37 (8/8) (5.43/7.02)	8.71 (4/4) (7.92/9.43)	DR-08 INDICATOR SITE BOUNDARY 0.25 MILES SSW OF SITE	0

TABLE 5.2

ENVIRONMENTAL TLD DATA SUMMARY
 VERMONT YANKEE NUCLEAR POWER STATION, VERNON, VT
 (JANUARY - DECEMBER 2008)

<u>INNER RING TLD</u>	<u>OUTER RING TLD</u>	<u>OFFSITE STATION WITH HIGHEST MEAN</u>	<u>CONTROL TLDs</u>
MEAN* RANGE* <u>(NO. MEASUREMENTS)**</u>	MEAN* RANGE* <u>(NO. MEASUREMENTS)**</u>	STA.NO./ MEAN* RANGE* <u>(NO. MEASUREMENTS)**</u>	MEAN* RANGE* <u>(NO. MEASUREMENTS)**</u>
6.5 ± 0.36 4.8 to 7.9 75	6.6 ± 0.37 4.6 to 8.2 66	DR-20 7.4 ± 0.42 5.8 to 8.0 4	6.37 ± 0.37 5.43 to 7.0 8
	<u>SITE BOUNDARY TLD WITH HIGHEST MEAN</u>	<u>SITE BOUNDARY TLD</u>	
	STA.NO./ MEAN* RANGE* <u>(NO. MEASUREMENTS)**</u>	MEAN* RANGE * <u>(NO. MEASUREMENTS)**</u>	
	DR-45 15.4 ± 0.90 14.6 to 16.6 4	8.5 ± 0.46 4.8 to 16.6 52	

* Units are in micro-R per hour.

** Each "measurement" is typically based on quarterly readings from five TLD elements.

TABLE 5.3

ENVIRONMENTAL TLD MEASUREMENTS

2008

(Micro-R per Hour)

Sta. No.	Description	1ST QUARTER		2ND QUARTER		3RD QUARTER		4TH QUARTER		ANNUAL AVE.
		EXP.	S.D.	EXP.	S.D.	EXP.	S.D.	EXP.	S.D.	EXP.
DR-01	River Sta. No. 3.3	5.36	± 0.26	6.21	± 0.38	6.26	± 0.28	5.65	± 0.28	5.9
DR-02	N Hinsdale, NH	5.48	± 0.30	6.99	± 0.38	6.79	± 0.43	6.94	± 0.41	6.6
DR-03	Hinsdale Substation	5.93	± 0.56	7.48	± 0.46	7.27	± 0.33	7.05	± 0.33	6.9
DR-04	Northfield, MA	5.43	± 0.22	6.55	± 0.52	6.53	± 0.29	6.13	± 0.31	6.2
DR-05	Spofford Lake, NH	5.67	± 0.39	7.02	± 0.44	6.95	± 0.42	6.63	± 0.34	6.6
DR-06	Vernon School	5.91	± 0.26	7.32	± 0.41	7.77	± 0.37	6.50	± 0.46	6.9
DR-07	Site Boundary	6.30	± 0.36	9.09	± 0.63	8.41	± 0.44	7.50	± 0.36	7.8
DR-08	Site Boundary	7.92	± 0.33	9.43	± 0.50	9.21	± 0.58	8.28	± 0.41	8.7
DR-09	Inner Ring	5.38	± 0.29	0.00	± 0.00	6.43	± 0.41	6.51	± 0.51	4.6
DR-10	Outer Ring	4.82	± 0.25	5.88	± 0.48	5.72	± 0.32	5.71	± 0.23	5.5
DR-11	Inner Ring	5.26	± 0.22	6.52	± 0.41	6.17	± 0.30	6.09	± 0.33	6.0
DR-12	Outer Ring	4.61	± 0.22	6.13	± 0.39	6.19	± 0.40	5.92	± 0.30	5.7
DR-13	Inner Ring	5.68	± 0.29	6.64	± 0.39	6.79	± 0.36	6.56	± 0.34	6.4
DR-14	Outer Ring	5.74	± 0.38	8.17	± 0.51	7.89	± 0.43	7.47	± 0.37	7.3
DR-15	Inner Ring	6.35	± 0.41	7.26	± 0.52	6.98	± 0.42	6.72	± 0.26	6.8
DR-16	Outer Ring	6.78	± 0.34	7.37	± 0.43	7.32	± 0.39	7.11	± 0.26	7.1
DR-17	Inner Ring	5.33	± 0.31	6.77	± 0.39	6.72	± 0.38	6.35	± 0.37	6.3
DR-18	Outer Ring	5.33	± 0.38	6.96	± 0.45	6.84	± 0.27	6.74	± 0.45	6.5
DR-19	Inner Ring	5.97	± 0.32	7.88	± 0.48	7.89	± 0.46	7.51	± 0.32	7.3
DR-20	Outer Ring	5.82	± 0.26	7.91	± 0.45	8.02	± 0.49	7.65	± 0.45	7.4
DR-21	Inner Ring	4.83	± 0.34	7.07	± 0.45	6.91	± 0.32	6.85	± 0.35	6.4
DR-22	Outer Ring	5.65	± 0.43	7.26	± 0.47	6.93	± 0.34	6.99	± 0.36	6.7
DR-23	Inner Ring	5.43	± 0.27	6.52	± 0.37	6.16	± 0.35	5.95	± 0.39	6.0
DR-24	Outer Ring	4.86	± 0.22	6.64	± 0.36	6.07	± 0.31	6.15	± 0.31	5.9
DR-25	Inner Ring	5.65	± 0.43	7.04	± 0.43	6.93	± 0.38	6.75	± 0.33	6.6
DR-26	Outer Ring	5.34	± 0.46	7.24	± 0.50	7.25	± 0.30	7.05	± 0.32	6.7
DR-27	Inner Ring	4.97	± 0.25	7.06	± 0.39	6.81	± 0.46	6.81	± 0.67	6.4
DR-28	Outer Ring	5.16	± 0.25	7.10	± 0.47	6.96	± 0.42	6.51	± 0.44	6.4
DR-29	Inner Ring	5.49	± 0.39	7.46	± 0.49	7.22	± 0.40	6.93	± 0.26	6.8
DR-30	Outer Ring	5.16	± 0.28	6.31	± 0.49	7.16	± 0.44	6.46	± 0.31	6.3
DR-31	Inner Ring	5.37	± 0.24	7.25	± 0.40	7.18	± 0.41	6.85	± 0.35	6.7
DR-32	Outer Ring	4.79	± 0.37	6.72	± 0.40			6.27	± 0.31	5.9
DR-33	Inner Ring	5.80	± 0.31	7.30	± 0.40	7.10	± 0.35	7.06	± 0.29	6.8
DR-34	Outer Ring	5.16	± 0.42	7.37	± 0.48	7.48	± 0.33	7.11	± 0.29	6.8
DR-35	Inner Ring	5.98	± 0.26	7.11	± 0.44	6.85	± 0.28	6.86	± 0.28	6.7
DR-36	Outer Ring	5.85	± 0.27			8.02	± 0.43	7.87	± 0.29	7.3
DR-37	Inner Ring	4.89	± 0.33	7.12	± 0.40	7.19	± 0.36	6.65	± 0.31	6.5
DR-38	Outer Ring	6.22	± 0.45	7.55	± 0.44	7.74	± 0.34	7.18	± 0.42	7.2
DR-39	Inner Ring	5.31	± 0.26	7.30	± 0.67	7.02	± 0.36	6.80	± 0.30	6.6
DR-40	Outer Ring	5.83	± 0.37	7.06	± 0.53	6.86	± 0.40	6.73	± 0.27	6.6

Note: Blank spaces indicate missing TLDs

TABLE 5.3 (cont.)

ENVIRONMENTAL TLD MEASUREMENTS
2008
(Micro-R per Hour)

Sta. No.	Description	1ST QUARTER		2ND QUARTER		3RD QUARTER		4TH QUARTER		ANNUAL
		EXP.	S.D.	EXP.	S.D.	EXP.	S.D.	EXP.	S.D.	AVE. EXP.
DR-41	Site Boundary	5.92	± 0.30	7.40	± 0.49	7.82	± 0.40	7.10	± 0.27	7.1
DR-42	Site Boundary	4.84	± 0.27	7.10	± 0.42	7.50	± 0.29	6.80	± 0.31	6.6
DR-43	Site Boundary	6.08	± 0.42	8.26	± 0.46	8.11	± 0.34	7.38	± 0.38	7.5
DR-44	Site Boundary	9.51	± 0.62	9.53	± 0.78	9.62	± 0.41	8.73	± 0.52	9.4
DR-45	Site Boundary	14.60	± 1.12	14.89	± 0.98	15.53	± 0.94	16.64	± 0.62	15.4
DR-46	Site Boundary	8.31	± 0.35	9.14	± 0.69	9.35	± 0.38	8.91	± 0.40	8.9
DR-47	Site Boundary	6.29	± 0.27	8.26	± 0.47	8.27	± 0.41	7.70	± 0.29	7.6
DR-48	Site Boundary	5.44	± 0.37	7.41	± 0.42	7.60	± 0.38	6.92	± 0.36	6.8
DR-49	Site Boundary	5.07	± 0.28	6.80	± 0.45	6.58	± 0.30	6.13	± 0.29	6.1
DR-50	Governor Hunt House	6.47	± 0.36	7.51	± 0.42	7.62	± 0.29	7.17	± 0.42	7.2
DR-51	Site Boundary	8.26	± 0.44	9.39	± 0.50	9.55	± 0.31	8.11	± 0.48	8.8
DR-52	Site Boundary	8.02	± 0.47	9.49	± 0.56	9.69	± 0.47	8.51	± 0.53	8.9
DR-53	Site Boundary	9.72	± 0.39	10.42	± 0.62	10.81	± 0.75	9.28	± 0.45	10.1

6. ANALYSIS OF ENVIRONMENTAL RESULTS

6.1 Sampling Program Deviations

Off-site Dose Calculation Manual Control 3.5.1 allows for deviations “if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons.” In 2008, twelve deviations were noted in the REMP. These deviations did not compromise the program’s effectiveness and are considered typical with respect to what is normally anticipated for any radiological environmental program. The specific deviations for 2008 were:

- a) The air sample station at Tyler Hill Road (ODCM Sample Number VAPCF-15) was discovered out of service for a period of approximately five hours during the weekly sample period of 168 hours during routine air sample collections on April 1st, 2008. This was determined by comparing the installed electrical timer data against the sample collection clock time for the period. This sample station is described in the Vermont Yankee Offsite Dose Calculation Manual (VY-ODCM), Table 7.1 as a “Non-required Control Station”. The electric utility supplying power to Tyler Hill Road was contacted. They were not aware of any line maintenance in this area during the collection period. This failure was documented in a Condition Report.
- b) The South River Station River Water Composite Sampler (ODCM Sample Number VWR-11) was observed to be empty. The Water Supply Pump failure was discovered on July 1st, 2008 during a routine housekeeping inspection. Three attempts were made to restart the pump, but each time the breaker tripped, indicating an obstruction or other problem with the pump. It was discovered that the compressor pump was plugged due to silty conditions in the river. The pump was cleared of silt and returned to service on 07/07/08. Daily grab samples of river water downstream of the plant were collected until the sample pump was restored to service. This failure was documented in a Condition Report.
- c) Three continuous Environmental Air Sample stations were without power following a severe thunderstorm on July 1st, 2008 and therefore out of service for a period of time concurrent with the storm. Two of the air sample stations are location at Vernon, Vermont. The air sample station off Stebbins Road in Vernon, Vermont (ODCM Sample Number VAPCF-11) at the South River Station was out of service for approximately 6 hours during the weekly collection period. The air sample station on Tyler Hill Road in Vernon, Vermont, (ODCM Sample Number VAPCF-15) was out of service for approximately 5 hours during the weekly collection period. The third station in North Hinsdale, New Hampshire (ODCM Sample Number VAPCF-12) was out of service for approximately 12 hours during the weekly collection period. At the time of the weekly sample collection on July 8th, 2008, all three stations were back in service and suffered no damage as a result of the storm and power outage. This failure was documented in a Condition Report.
- d) Two TLD locations were determined to have missing TLDs during the quarterly Environmental TLD change-out the week of July 14th, 2008. TLD DR-09, located in a holder on a telephone pole in Hinsdale, New Hampshire on Route 119, and TLD DR-36, located in a holder on a telephone pole on Route 5 in Guilford, Vermont were missing along with their respective holders. No signs of the TLDs or holders were discovered anywhere in the immediate area. New holders and TLDs for the ensuing third quarter were immediately installed at the same locations. This failure was documented in a Condition Report.

- e) Two continuous Environmental Air Sample collections were impacted following a severe thunderstorm on July 20th, 2008 and therefore out of service for a period of time concurrent with the storm. One of the air sample stations is located on Tyler Hill Road in Vernon, Vermont, (ODCM Sample Number VAPCF-15). This station was without power for a period of approximately 12 hours during the weekly collection period. The second station in North Hinsdale, New Hampshire on Route 119 (ODCM Sample Number VAPCF-12) was out of service for approximately 3.3 hours during the weekly collection period. At the time of the weekly sample collection on July 22nd, 2008 both stations were back in service and suffered no damage as a result of the storm and power outage. This failure was documented in a Condition Report.
- f) During a review of data from the weekly air sample collection of week 36, 2008 (from August 26th, 2008 to September 2nd, 2008) it was determined that two air sample stations, North Hinsdale, New Hampshire on Route 119 (ODCM Sample Number VAPCF-12) and Hinsdale Substation (ODCM Sample Number VAPCF-13) experienced power outages and reduced sample collection times of approximately 6.92 hours for each station. No thunderstorms were experienced during the sample collection period, however, line maintenance activities were being performed by Public Service of New Hampshire line crews during the sample collection period. The stations were running properly at the time of sample collection on September 2nd, 2008. This pump outage was documented in a Condition Report.
- g) During a review of data from the weekly air sample collections of week 37, 2008 (from September 2nd, 2008 to September 9th, 2008) it was determined that the air sample station at Spofford, New Hampshire (ODCM Sample Number VAPCF-21) was without electrical power for approximately 2.6 hours. The station was running normally at the time of sample collection on September 9th, 2008 and no other problems were noted with the air sample station equipment. This outage was documented in a Condition Report.
- h) During the quarterly Environmental TLD change-out on October 8th 2008, it was discovered that the TLD at DR-32 was missing from its location on a telephone pole on Route 5 in Guilford, Vermont in the west southwest sector from the plant site. No sign of the TLD or the holder was discovered anywhere in the immediate area. This event was documented in a Condition Report.
- i) During a review of data from the weekly air sample collections of week 42, 2008 (from October 7th, 2008 to October 14th, 2008) it was determined that the air sample station at Governor Hunt House on the Vermont Yankee Plant site (ODCM Sample Number VAPCF-40) was without electrical power for approximately 6.8 hours. Power was interrupted to Governor Hunt House on October 10th, 2008 during a planned power swap activity (Lighting Panel DP). The station was running normally at the time of sample collection on September 9, 2008 and no other problems were noted with the air sample station equipment. This outage was documented in a Condition Report.
- j) The South River Station River Water Composite Sampler Pump was found out of service on November 24th, 2008 during a routine inspection of the South River Station. The Environmental Specialist (REMP) observed that the River Water Composite Sampler water flow had ceased. Further investigation revealed that the River Water pump, located below the river water surface, was not pumping water up to the South River Station building and therefore there was no river water flow to the composite sampler. This event was documented in a Condition Report.
- k) An Environmental Milk Sample Container ruptured during shipment to the offsite analytical laboratory. Fourth Quarter, 2008 composite milk samples were shipped to the analytical laboratory in Knoxville, Tennessee for Strontium 89 and 90 analysis on December 3rd, 2008. Laboratory staff notified the Vermont Yankee Environmental Specialist (REMP) that one of the twenty eight one-liter-

sized bottles of milk had cracked open during shipment and that the single sample was not recoverable from the bottom of the sealed shipping container. Milk sample aliquots are collected and stored here at the Environmental Lab Facility on the Vermont Yankee plant site and then quarterly are shipped to the offsite analytical laboratory for Strontium 89 and 90 analyses. This analysis is required by Vermont Yankee Procedure OP4605, however, there is no Offsite Dose Calculation Manual (VYREMP) requirement for analyzing milk samples for Strontium 89 and 90. These analyses have been conducted for many years as an “extra” analysis in support of the Environmental Monitoring Program here at Vermont Yankee. Although this single sample, collected from County Farm on November 4th, 2008, was lost, there were three other composite samples collected at County Farm (on October 7th, October 21st, and December 2nd, 2008) in the shipping container that were not affected and have been analyzed from Strontium 89 and 90, per the sampling schedule. This event was documented in a Condition Report.

- l) During a review of data from the weekly air sample collections of week 51, 2008 (from December 9th, 2008 to December 16th, 2008) it was determined that the air sample station at Spofford, New Hampshire (ODCM Sample Number VAPCF-21) was without electrical power for approximately 21 hours. The loss of power at this sample station coincides with the loss of power across the state of New Hampshire during and following the ice storm on December 12th, 2008. More than 400,000 electric power customers were without power for various times; some more than 7 days. The station was running normally during the time of sample collection on December 16th, 2008 and no other problems were noted with the air sample station equipment. This loss of power to this station was documented in a Condition Report.

- m) Air sample station outages are reflected in the air sample collection time percentages listed below.

AP/CF #	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
11	99.9%	100%	99.8%	99.9%
12	99.9%	100%	99.0%	100%
13	99.9%	100%	99.7%	100%
14	99.9%	100%	100%	100%
15	99.6%	99.6%	99.2%	99.9%
21	99.9%	99.8%	99.8%	99.0%
40	99.9%	100%	100%	99.5%

6.2 Comparison of Achieved LLDs with Requirements

Table 4.5.1 of the VYNPS ODCM (also shown in Table 4.4 of this report) gives the required Lower Limits of Detection (LLDs) for environmental sample analyses. On occasion, an LLD is not achievable due to a situation such as a low sample volume caused by sampling equipment malfunction or limited sample availability. In such a case, ODCM 10.2 requires a discussion of the situation. At the contracted environmental laboratory, the target LLD for the majority of analyses is 50 percent of the most restrictive required LLD. Expressed differently, the typical sensitivities achieved for each analysis are at least 2 times greater than that required by the VYNPS ODCM. For each analysis having an LLD requirement in ODCM Table 4.5.1, the *a posteriori* (after the fact) LLD calculated for that analysis was compared with the required LLD. During 2008, all sample analyses performed for the REMP program achieved an *a posteriori* LLD less than the corresponding LLD requirement.

6.3 Comparison of Results with Reporting Levels

ODCM Section 10.3.4 requires written notification to the NRC within 30 days of receipt of an analysis result whenever a Reporting Level in ODCM Table 3.5.2 is exceeded. Reporting Levels are the environmental concentrations that relate to the ALARA design dose objectives of 10 CFR 50, Appendix I. Environmental concentrations are averaged over the calendar quarters for the purposes of this comparison. The Reporting Levels are intended to apply only to measured levels of radioactivity due to plant effluents. During 2008, no analytical result exceeded a corresponding reporting level requirement in Table 3.5.2 of the ODCM.

6.4 Changes in Sampling Locations

The Vermont Yankee Nuclear Power Station Off-Site Dose Calculation Manual Section 10.2 states that if “new environmental sampling locations are identified in accordance with Control 3.5.2, the new locations shall be identified in the next Annual Radiological Environmental Operating Report.” There were no required sampling location changes due to the Land Use Census conducted in 2008.

This year Vermont Yankee is continuing to add data from the on-site air sampling station, AP/CF 40, at the Governor Hunt House. This location has been used continuously as a demonstration since early in the program, but the data had not previously been included in this report.

6.5 Data Analysis by Media Type

The 2008 REMP data for each media type is discussed below. Whenever a specific measurement result is presented, it is given as the concentration in the units of the sample (volume or weight). An analysis is considered to yield a “detectable measurement” when the concentration exceeds three times the standard deviation for that analysis and is greater than or equal to the Minimum Detectable Concentration (MDC) for the analysis. With respect to data plots, all net concentrations are plotted as reported, without regard to whether the value is “detectable” or “non-detectable.” In previous years, values that were less than the MDC were converted to zero.

6.5.1 Airborne Pathways

6.5.1.1 Air Particulates (AP)

The periodic air particulate filters from each of the seven sampling sites were analyzed for gross-beta radioactivity. At the end of each quarter, the filters from each sampling site were composited for a gamma analysis. The results of the air particulate sampling program are shown in Table 5.1 and Figures 6.1 through 6.7.

Gross beta activity was detected in all air particulate filters that were analyzed. As shown in Figure 6.1, there is no significant difference between the quarterly average concentrations at the indicator (near-plant) stations and the control (distant from plant) stations. Notable in Figure 6.1 is a distinct annual cycle, with the minimum concentration in the second quarter, and the maximum concentration in the first quarter.

Figures 6.2 through 6.7 show the weekly gross beta concentration at each air particulate sampling location compared to the control air particulate sampling location at AP-21 (Spofford Lake, NH). Small differences are evident and expected between individual sampling locations. Figure 6.2 clearly demonstrates the distinct annual cycle, with the minimum concentration in the second quarter, and the maximum concentration in the first quarter. It can be seen that the gross-beta measurements on air particulate filters fluctuate significantly over the course of a year. The measurements from control station AP-21 vary similarly, indicating that these fluctuations are due to regional changes in naturally-occurring airborne radioactive materials, and not due to Vermont Yankee operations.

There were two naturally-occurring gamma-emitting radionuclides detected on the air particulate filters during this reporting period. Be-7, a naturally-occurring cosmogenic radionuclide, was detected on 28 of 28 filter sets analyzed. K-40 was detected on 10 out of 28 analyzed. Ra-226 and Ac/Th-228 were not detected in the 28 filter sets analyzed.

6.5.1.2 Charcoal Cartridges (CF)

Charcoal cartridges from each of the seven air sampling sites were analyzed for I-131 each time they were collected. The results of these analyses are summarized in Table 5.1. As in previous years, no I-131 was detected in any charcoal cartridge.

6.5.2 Waterborne Pathways

6.5.2.1 River Water (WR)

Aliquots of river water were automatically collected periodically from the Connecticut River downstream from the plant discharge area and hydro station, location WR-11, with the exception of the two events of short duration when the sampling equipment was out of service (see Section 6.1). Monthly grab samples were also collected at the upstream control location, also on the Connecticut River, location WR-21. The composited samples at WR-11 were collected monthly and sent along with the WR-21 grab samples to the contracted environmental laboratory for analysis. Table 5.1 shows that gross-beta measurements were positive in 12 out of 12 indicator samples and 12 out of 12 control samples, as would be expected, due to naturally-occurring radionuclides in the water. As seen in Figure 6.8, the mean concentration of the indicator locations was similar to the mean concentration at the control location in 2008.

For each sampling site, the monthly samples were composited into quarterly samples for H-3 (Tritium) analyses. None of the samples contained detectable quantities of H-3.

There was one naturally-occurring gamma-emitting radionuclides detected in river water samples during this reporting period. Ra-226, a naturally-occurring primordial radionuclide, was detected in nine of 24 samples analyzed.

6.5.2.2 Ground Water (WG)

Quarterly ground water (deep wells supplying drinking water to the plant and selected offsite locations) samples were collected from four indicator locations (only one is required by VYNPS ODCM) and one control location during 2008. WG-13 (COB Well), an on-site well location, has been routinely sampled since the second half of 1996. In 1999, WG-14 (PSB Well) another on-site well location was added to the program. Table 5.1 and Figure 6.9 show that gross-beta measurements were positive in 16 out of 16 indicator samples and in 4 out of 4 control samples. The beta activity is due to naturally-occurring radionuclides in the water. The levels at all sampling locations, including the higher levels at station WG-13, were consistent with those detected in previous years. Naturally occurring Ra-226 was also detected in eight samples and is naturally-occurring. No other gamma-emitting radionuclides or tritium were detected in any of the samples.

6.5.2.3 Sediment (SE)

Semi-annual river sediment grab samples were collected from two indicator locations during 2008. The

North Storm Drain Outfall location (SE-12) is an area where up to 40 different locations can be sampled within a 20 ft by 140 ft area. In 2008, 16 locations were sampled at SE-12 during each of the semi-annual collections. Two samples were collected at SE-11 during the year. Be-7 was detected in one of the 36 samples analyzed. As would be expected, naturally-occurring Potassium-40 (K-40) was detected in all of the samples. Cobalt-60 was not detected in any of the 36 samples. Radium-226 (Ra-226) was detected in 19 of 36 samples. Actinium-228 was detected in 14 of 36 samples. Thorium-228 (Th-228) was detected in all 32 samples analyzed. Thorium-232 (Th-232) was detected in all 36 samples analyzed. Uranium-238 (U-238) was not detected in any of the 36 samples. Cesium-137 (Cs-137) was detected in 24 out of 34 of the indicator samples and none of the two control samples. The levels of Cs-137 measured were consistent with what has been measured in the previous several years and with those detected at other New England locations. Other plant-related radionuclides are reported in trace quantities in Table 5.1 SE. Also see section 6.5.2.6 for more information.

6.5.2.4 Test Wells (WT)

During 1996, sampling was initiated at test wells around the outer edges of an area in the south portion of the VYNPS site where septic sludge is spread. This sampling continued through 2008. The test well locations are shown on Figure 4.1 and the results are summarized in Table 5.1 under the media category, Test Well (WT). In 2008, four samples were taken at each of the four locations and all were analyzed for gamma isotopic, gross beta and H-3 activity.

Prior to the gross beta analysis, each sample was filtered through a 0.45 micron Gelman Tuffryn membrane filter. Gross beta activity was detected in all 16 samples collected with levels ranging from 3 to 22 pCi/kg. K-40 was also detected in eight of the 16 samples. No other radionuclides were detected.

6.5.2.5 Storm Drain System

The presence of plant-related radionuclides in the onsite storm drain system has been identified in previous years at Vermont Yankee (VY). As a consequence, a 50.59 evaluation of radioactive materials discharged via the storm drain system was performed in 1998. This assessment was in response to Information and Enforcement Bulletin No. 80-10 and NRC Information Notice No. 91-40. The evaluation demonstrated that the total curies released via the VYNPS storm drain system are not sufficient to result in a significant dose (i.e. dose does not exceed 10% of the technical specification objective of 0.3 millirem per year to the total body, and 1.0 millirem per year to the target organ for the maximally exposed receptor). Water and sediment in the onsite storm drain system was routinely sampled throughout 2008 at various points. The results of this sampling are summarized below.

Sediment samples were taken from the storm drain system at onsite manhole locations in 2008 for a total of 19 samples. All samples were analyzed for gamma emitting isotopes. Table 6-1 summarizes the

analytical results of the sediment samples. The naturally-occurring isotope Ra-226 was found in twelve of seventeen samples as expected. The highest detected concentration for all plant-related radionuclides that were detected in sediment samples was found in sample SE-95, which is also designated by the plant as Manhole 12.

Table 6.1

Summary of Storm Drain System Sediment Sample Analyses*

Isotope	No. Detected**	Mean (pCi/kg)	Range (pCi/kg)	Station With Highest Detected Concentration
Ra-226	12/17	8.2 E 2	(0.259– 1.75) E 3	MH-12 (SE-95)
Cs-137	7/19	4.3 E 2	(0.32 – 31.9) E 2	MH-12 (SE-95)
Mn-54	5/19	1.1 E 2	(0.32 – 3.53) E 2	MH-12 (SE-95)
Co-60	7/19	9.4 E 2	(0.32 – 49.2) E 2	MH-12 (SE-95)

* Radionuclides that were not detected in any sample are not listed

** The fraction of sample analyses yielding detectable measurements (i.e. >3 standard deviations). The mean and the range are determined only from the samples where activity was >3 standard deviations.

Water samples were taken from the storm drain system at various access points in 2008 including Manholes MH-8, MH-11H, MH-12A, MH-13, and MH-14. Table 6-2 summarizes the analytical results of water samples from the storm drain system (MH-12A and MH-14) in 2008. Low levels of gross beta activity were detected in all samples analyzed at concentrations that are typical of any environmental water sample. Tritium (H-3) was not detected in the 24 samples analyzed.

In 1998, an additional dose assessment was performed that incorporated all of the 1998 storm drain system analytical results (including both sediment and water). The dose assessment was performed using the maximum measured concentration of radionuclides in 1998, and a conservative estimate of the volume of sediment and water discharged via the storm drain system. The results of this dose assessment are estimates of the total body and maximum organ dose equaling 3.2% and 1.6% of the corresponding Technical Specification dose limits respectively. Therefore, there was no significant dose impact from plant-related radionuclides in the storm drain system in 1998. The sampling conducted in 2008 indicates that the presence of radionuclides in the storm drain system has not changed significantly. Therefore, the storm drain system remains an insignificant impact to dose. The VYNPS staff will continue to monitor the presence of plant related radionuclides in the storm drain system.

Table 6.2

Summary of Storm Drain System Water Sample Analyses*

Isotope	No. Detected **	Mean (pCi/L)	Range (pCi/L)	Station With Highest Detected Concentration
Gross Beta	24/24	3.2 E 0	(0.7 – 7.0) E 0	MH-12A (WW-12)
H-3	0/24	NA	NA	-
Ra-226	6/24	1.2E 2	(0.96 – 1.8) E 2	MH-12A (WW-12)
I-131	0/24	NA	NA	-
Cs-134	0/24	NA	NA	-
Cs-137	0/24	NA	NA	-
ZrNb-95	0/24	NA	NA	-
Co-58	0/24	NA	NA	-
Mn-54	0/24	NA	NA	-
Zn-65	0/24	NA	NA	-
Fe-59	0/24	NA	NA	-
Co-60	0/24	NA	NA	-
Ba/La-140	0/24	NA	NA	-

* Radionuclides that were not detected in any sample are not listed

** The fraction of sample analyses yielding detectable measurements (i.e. >3 standard deviations).

6.5.2.6 Air Compressor Condensate and Manhole Sampling Results

The presence of tritium in station air compressor condensate and manholes (Storm Drain System) has been identified since 1995 (ER_95-0704). An evaluation has been performed (S.R.1592) which states "...leakage of tritium found in the storm drains (manholes) to ground water beneath the site will be transported by natural ground water gradient to the Connecticut River. However, at the current measured concentrations and postulated leak rate from the storm drains, the offsite dose impact is not significant (<2.4E-5 mrem/year)." Data provided in Table 6.3 will be filed under the requirements of 10CFR50.75(g) and is presented here in response to ER_95-0704_04 commitments.

Table 6.3
Summary of Air Compressor Condensate and Manhole Water Tritium Concentrations*

Sample Location	No. Detected**	Mean (microcuries/ml)	Range (microcuries/ml)
Air Compressor Condensate	7/7	3.02 E-4	(0.38 – 130) E-5
Manhole 11H	0/12	None Detected	None Detected
Manhole 13	10/17	2.60 E-6	(1.30 – 5.50) E-6
Manhole 8	0/12	None Detected	None Detected

* Reported per ER_950704_04.

** The fraction of sample analyses yielding detectable measurements

6.5.3 Ingestion Pathways

6.5.3.1 Milk (TM)

Milk samples from cows at several local farms were collected monthly during 2008. Twice-per-month collections were made during the “pasture season” since the milking cows or goats were identified as being fed pasture grass during that time. Each sample was analyzed for I-131 and other gamma-emitting radionuclides. Quarterly composites (by location) were analyzed for Sr-89 and Sr-90.

As expected, naturally-occurring K-40 was detected in all samples. Also expected was Sr-90. Sr-90 was detected in 12 out of 20 indicator samples and 3 out of 4 control samples. Although Sr-90 is a by-product of nuclear power plant operations, the levels detected in milk are consistent with that expected from worldwide fallout from nuclear weapons tests, and to a much lesser degree from fallout from the Chernobyl incident. The Sr-90 levels shown in Table 5.1 and Figure 6.11 are consistent with those detected at other New England farms participating in other plant environmental monitoring programs. This radionuclide and Cs-137 are present throughout the natural environment as a result of atmospheric nuclear weapons testing that started primarily in the late 1950’s and continued through 1980. They are found in soil and vegetation, as well as anything that feeds upon vegetation, directly or indirectly. The detection of Cs-137 in environmental milk samples is expected and has been detected in previous years. Cs-137 was not detected in any of 90 samples in 2008. See Figure 6.10. It should be noted here that most of the Cs-137 concentrations and many of the Sr-90 concentrations shown on Figures 6.10 and 6.11, respectively, are considered “not detectable.” All values have been plotted, regardless of whether they were considered statistically significant or not. As shown in these figures, the levels are also consistent with those detected in previous years near the VYNPS plant. There is also little actual difference in concentrations between farms.

6.5.3.2 Silage (TC)

A silage sample was collected from each of the required milk sampling stations during October. Each of these was analyzed for gamma-emitting radionuclides and I-131. As expected with all biological media, naturally-occurring Be-7 and K-40 were detected in all samples. Naturally-occurring Ra-226 was also detected in 4 of the 5 samples. Cs-137 was not detected in any of the five samples. No I-131 was detected in any sample.

6.5.3.3 Mixed Grass (TG)

Mixed grass samples were collected at each of the air sampling stations on three occasions during 2008. As expected with all biological media, naturally-occurring Be-7 was detected in 20 of the 21 samples. Naturally-occurring K-40 was detected in all samples. Naturally-occurring Ra-226 was detected in 11 of the 21 samples and naturally occurring Ac-228 was detected in three samples. Cs-137 was not in any of the samples.

6.5.3.4 Fish (FH)

Semiannual samples of fish were collected from two locations in both spring and fall of 2008. Several species are collected such as Walleye, Small Mouth Bass, Large Mouth Bass, Yellow Perch, White Perch, and Rock Bass. The edible portions of each of these were analyzed for gamma-emitting radionuclides. As expected in biological matter, naturally-occurring K-40 was detected in all samples.

As shown in Table 5.1, Cs-137 was not detected in this year's samples. It should be noted that most of the Cs-137 concentrations plotted in Figure 6.12 are considered "not detectable." All values were plotted regardless of whether they were considered statistically significant or not. The Cs-137 levels plotted for 2008 and previous years are typical of concentrations attributable to global nuclear weapons testing fallout.

No other radionuclides were detected.

6.5.4 Direct Radiation Pathway

Direct radiation was continuously measured at 53 locations surrounding the Vermont Yankee plant with the use of thermoluminescent dosimeters (TLDs).

In 1999, DR-53 was added on the site boundary. The TLDs are collected every calendar quarter for

readout at the environmental laboratory. The complete summary of data may be found in Table 5.3.

From Tables 5.2 and 5.3 and Figure 6.13, it can be seen that the Inner and Outer Ring TLD mean exposure rates were not significantly different in 2008. This indicates no significant overall increase in direct radiation exposure rates in the plant vicinity. It can also be seen from these tables that the Control TLD mean exposure rate was not significantly different than that at the Inner and Outer Rings. Figure 6.13 also shows an annual cycle at both indicator and control locations. The lowest point of the cycle occurs usually during the winter months. This is due primarily to the attenuating effect of the snow cover on radon emissions and on direct irradiation by naturally-occurring radionuclides in the soil. Differing amounts of these naturally-occurring radionuclides in the underlying soil, rock or nearby building materials result in different radiation levels between one field site and another.

Upon examining Figure 6.17, as well as Table 5.2, it is evident that in recent years, station DR-45 had a higher average exposure rate than any other station. This location is on-site, and the higher exposure rates are due to plant operations and activities in the immediate vicinity of this TLD. The same can be said for station DR-46, which has shown higher exposure rates in previous years. There is no significant dose potential to the surrounding population or any real individual from these sources since they are located on the back side of the plant site, between the facility and the river.

Environmental Program Trend Graphs
2008 Radiological Environmental Operating Report
Vermont Yankee

Graphs:

- 6.1 – Gross Beta Measurements on Air Particulate Filters (Average Concentrations)
- 6.2 – Gross Beta Measurements on Air Particulate Filters (11)
- 6.3 – Gross Beta Measurements on Air Particulate Filters (12)
- 6.4 – Gross Beta Measurements on Air Particulate Filters (13)
- 6.5 – Gross Beta Measurements on Air Particulate Filters (14)
- 6.6 – Gross Beta Measurements on Air Particulate Filters (15)
- 6.7 – Gross Beta Measurements on Air Particulate Filters (40)
- 6.8 – Gross Beta Measurement on River Water (Average Concentrations)
- 6.9 – Gross Beta Measurement on Ground Water (Average Concentrations)
- 6.10 – Cesium-137 in Milk (Annual Average Concentrations)
- 6.11 - Strontium 90 in Milk (Annual Average Concentrations)
- 6.12 – Cesium-137 in Fish (Annual Average Concentrations)
- 6.13 – Exposure Rate at Inner Ring, Outer Ring, and Control TLDS
- 6.14 – Exposure Rate at Indicator TLDS, DR01-03
- 6.15 – Exposure Rate at Indicator TLDS, DR 06,50
- 6.16 – Exposure Rate at Site Boundary TLDS, DR 07 - 08, 41 - 42
- 6.17 – Exposure Rate at Site Boundary TLDS, DR 43-46
- 6.18 – Exposure Rate at Site Boundary TLDS, DR 47-49, 51-53
- 6.19 – Exposure Rate at Inner Ring TLDS, DR 09-15(odd)
- 6.20 – Exposure Rate at Inner Ring TLDS, DR-17-23 (odd)
- 6.21 – Exposure Rate at Inner Ring TLDS, DR 25-31 (odd)
- 6.22 - Exposure Rate at Inner Ring TLDS, DR 33-39 (odd)
- 6.23 – Exposure Rate at Outer Ring TLDS, DR 10 - 16 (even)
- 6.24 – Exposure Rate at Outer Ring TLDS, DR 18-24 (even)
- 6.25 – Exposure Rate at Outer Ring TLDS, DR 26-32 (even)
- 6.26 – Exposure Rate at Outer Ring TLDS, DR 34-40 (even)
- 6.27 – Exposure Rate at Control TLDS, DR 04-05

Figure 6.1 - Gross Beta Measurements on Air Particulate Filters - Quarterly Average Concentrations

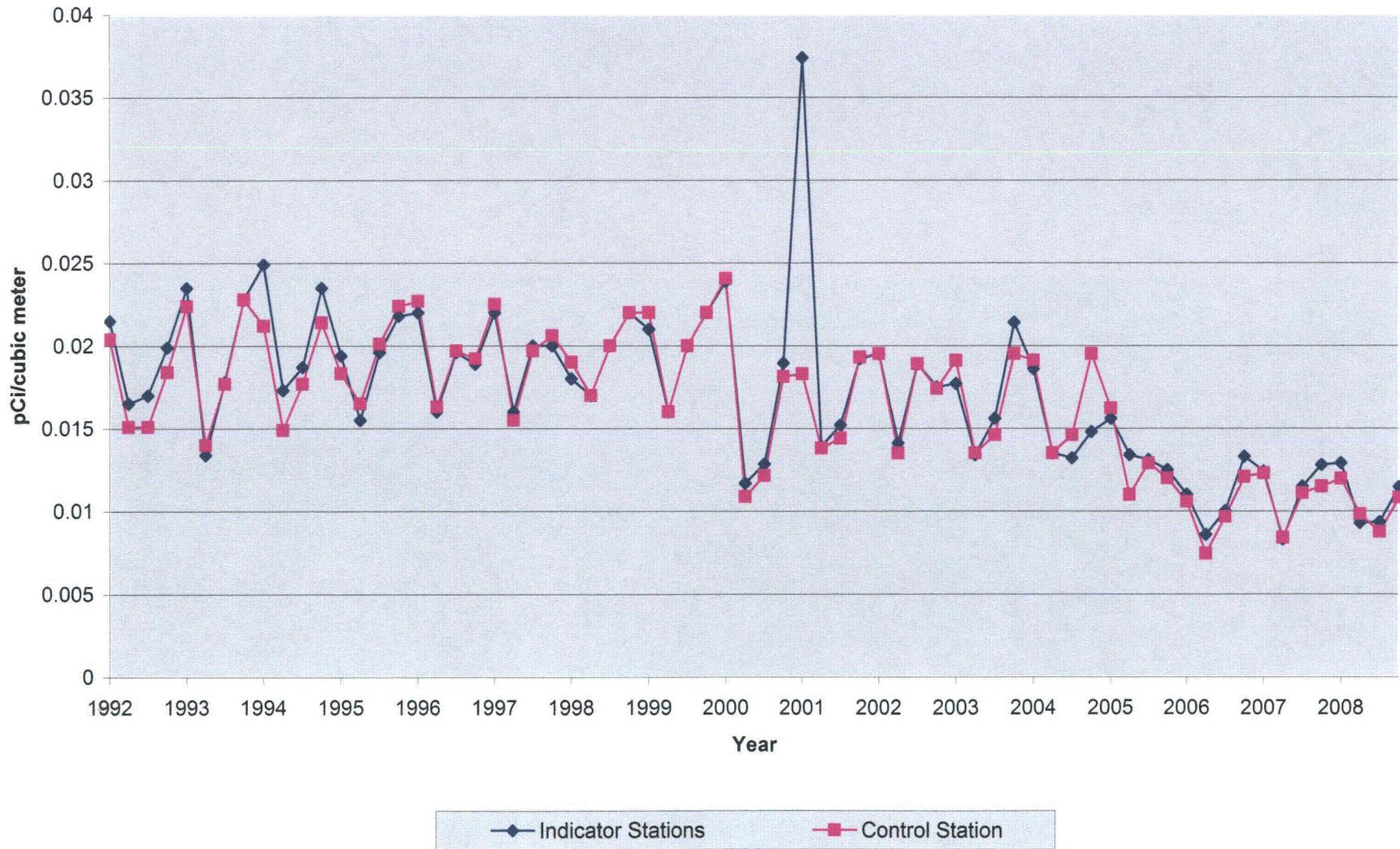


Figure 6.2 - Gross Beta Measurements on Air Particulate Filters

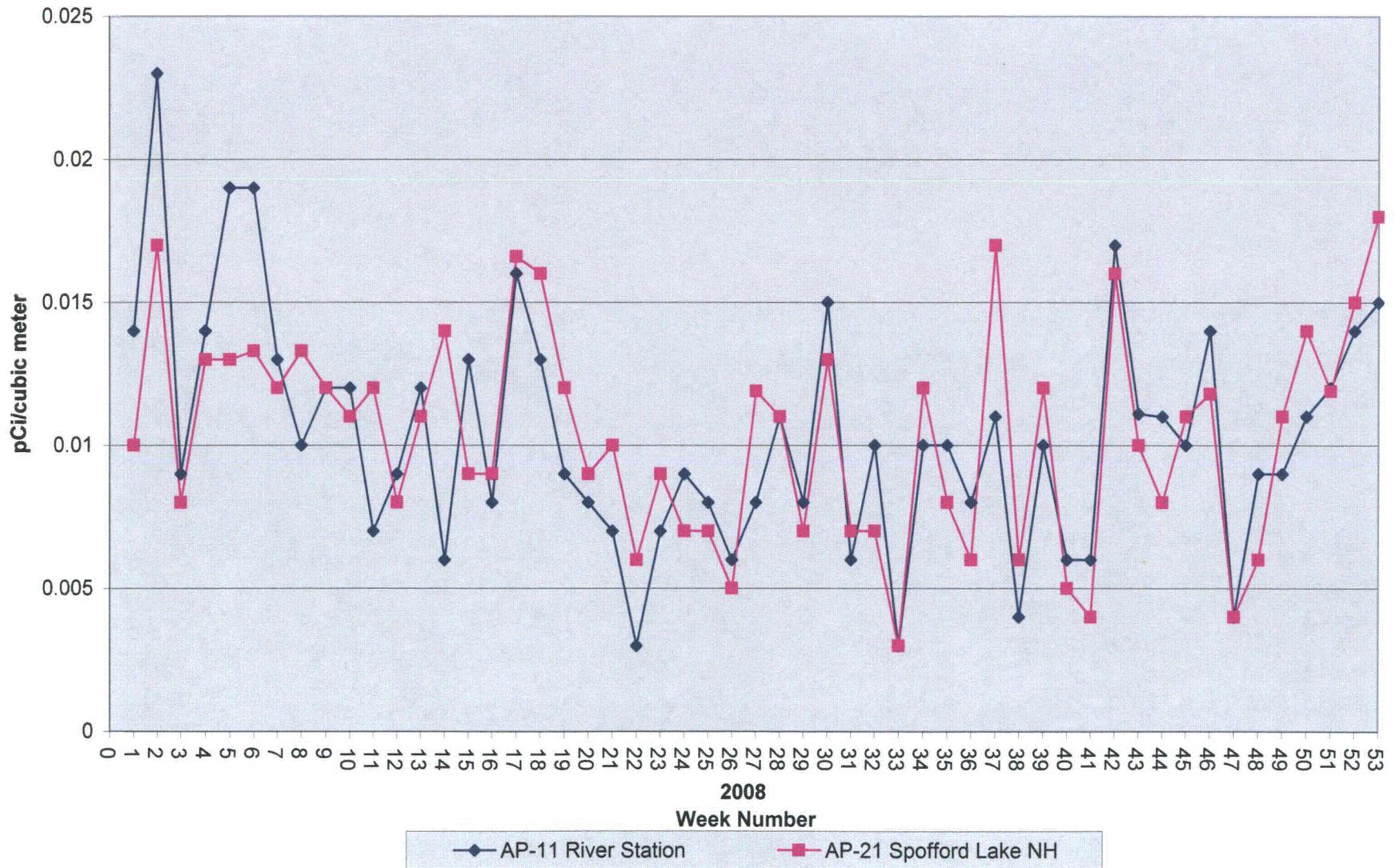


Figure 6.3 - Gross Beta Measurements on Air Particulate Filters

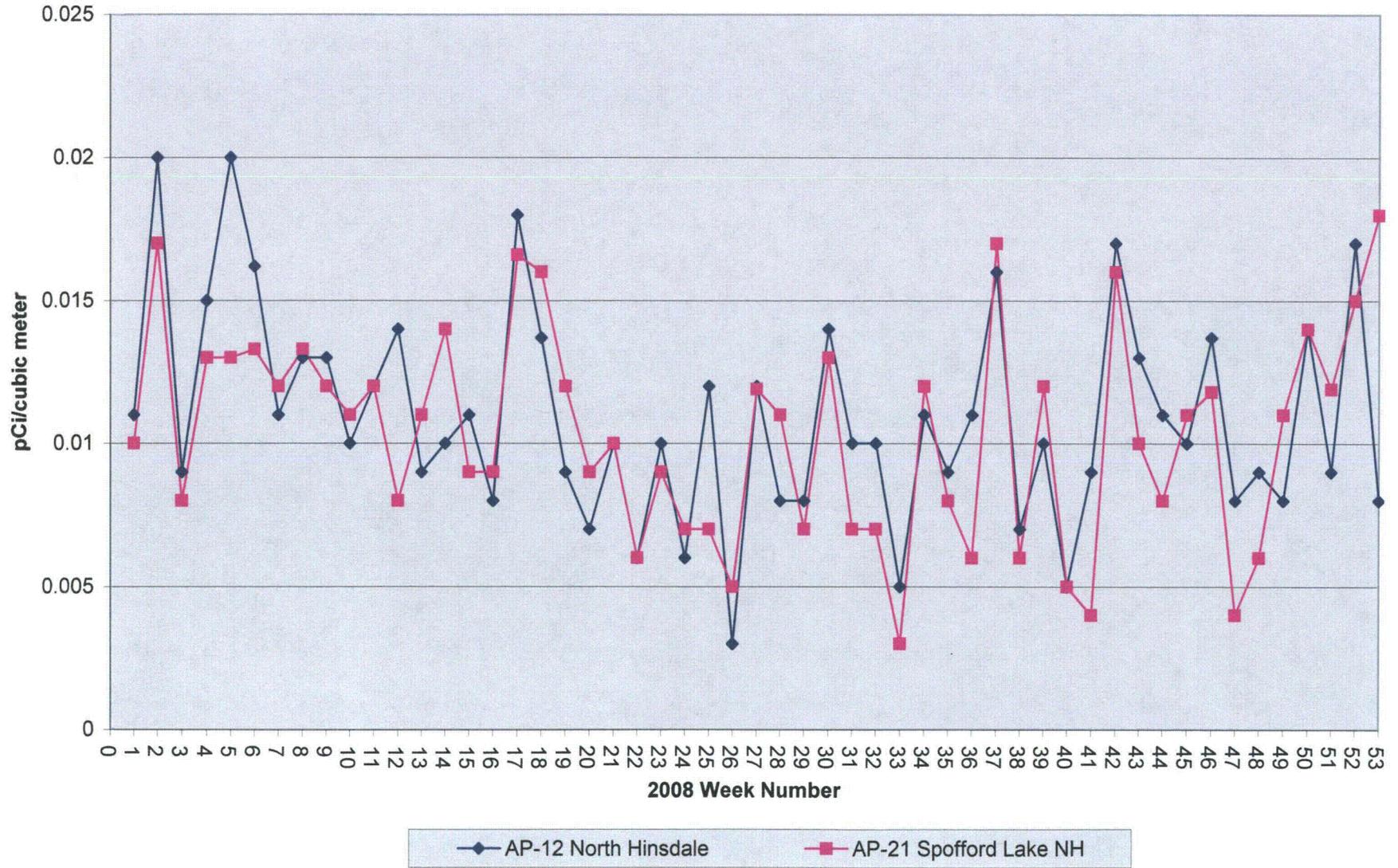


Figure 6.4 - Gross Beta Measurements on Air Particulate Filters

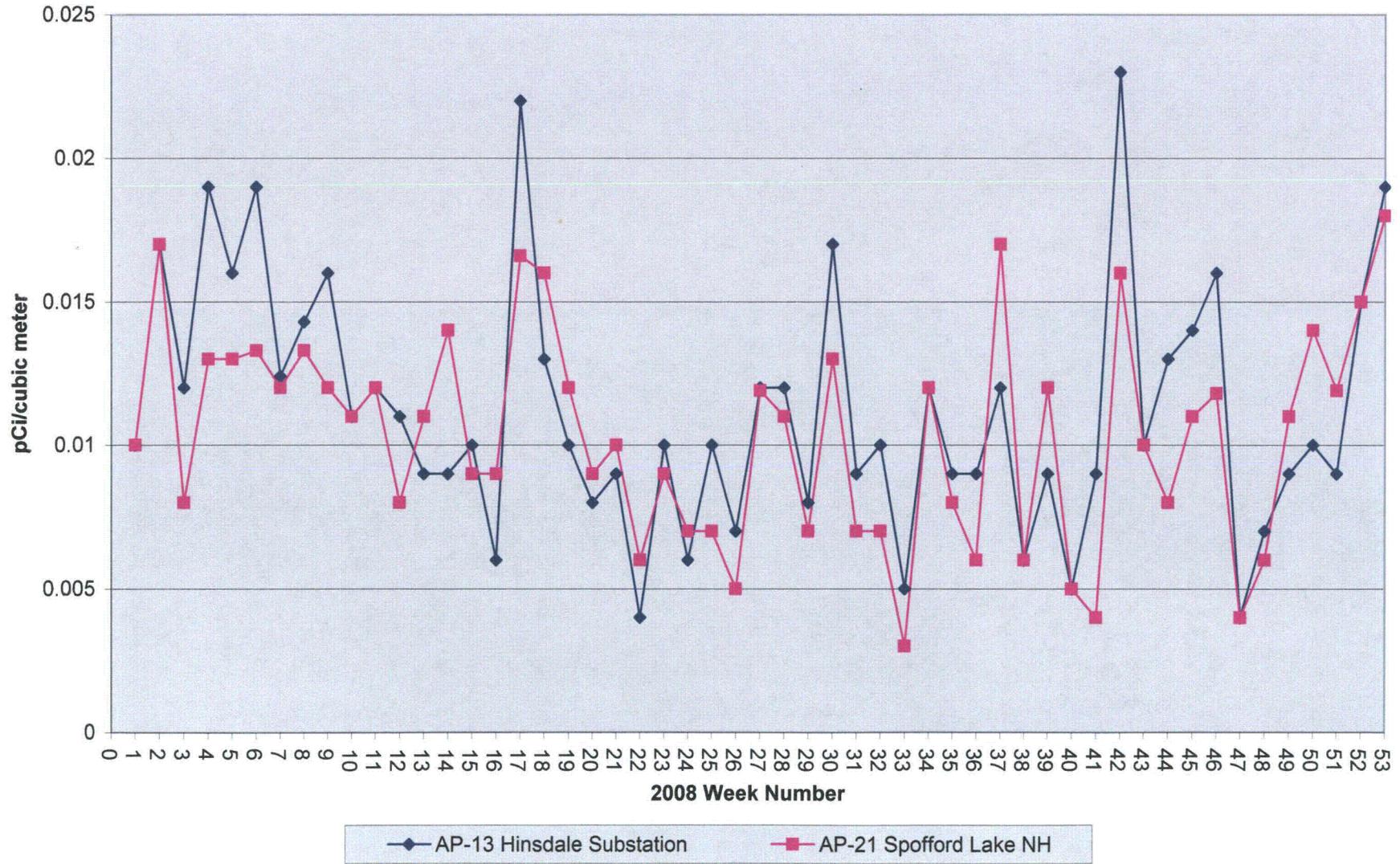


Figure 6.5 - Gross Beta Measurements on Air Particulate Filters

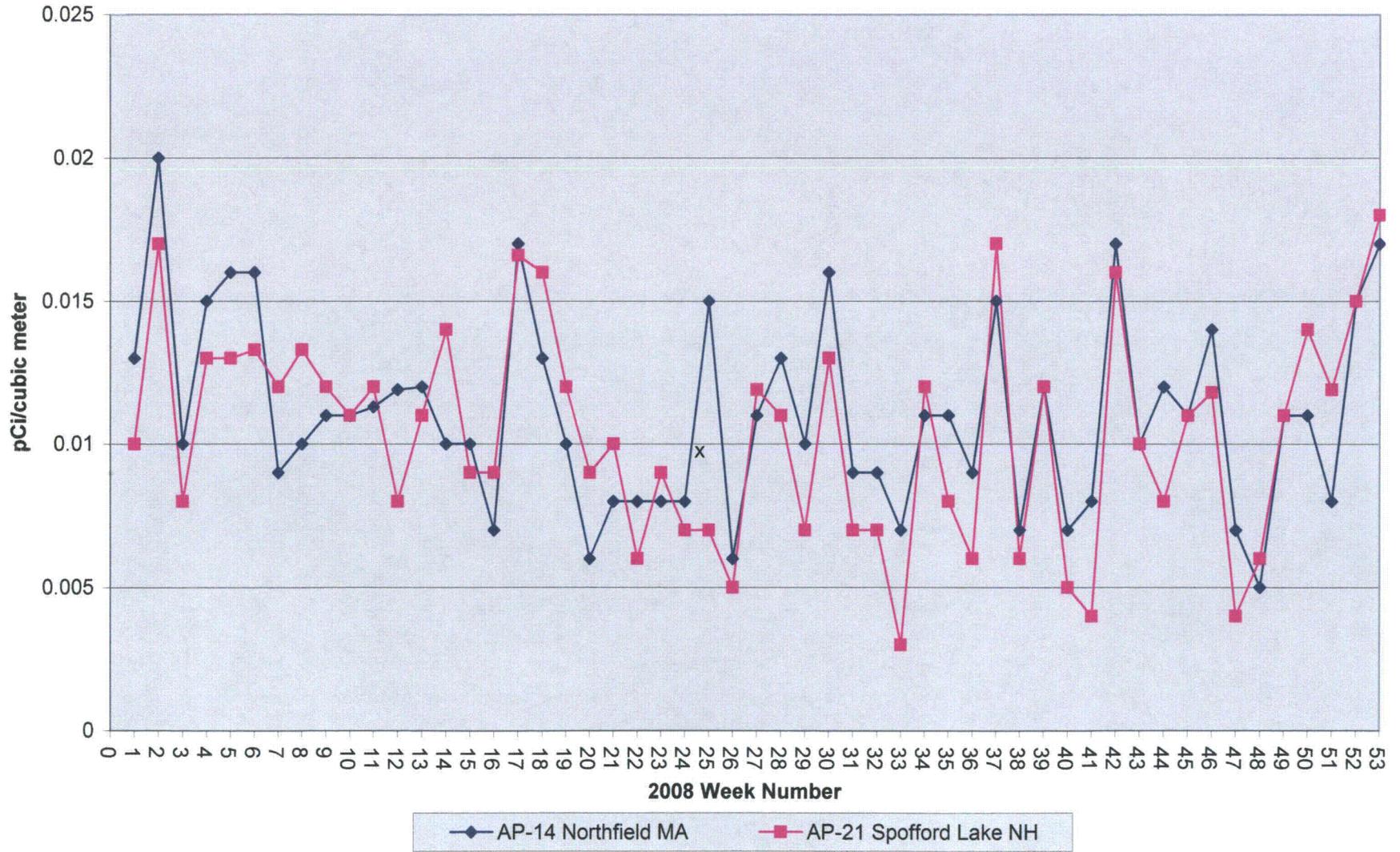


Figure 6.6 - Gross Beta Measurements on Air Particulate Filters

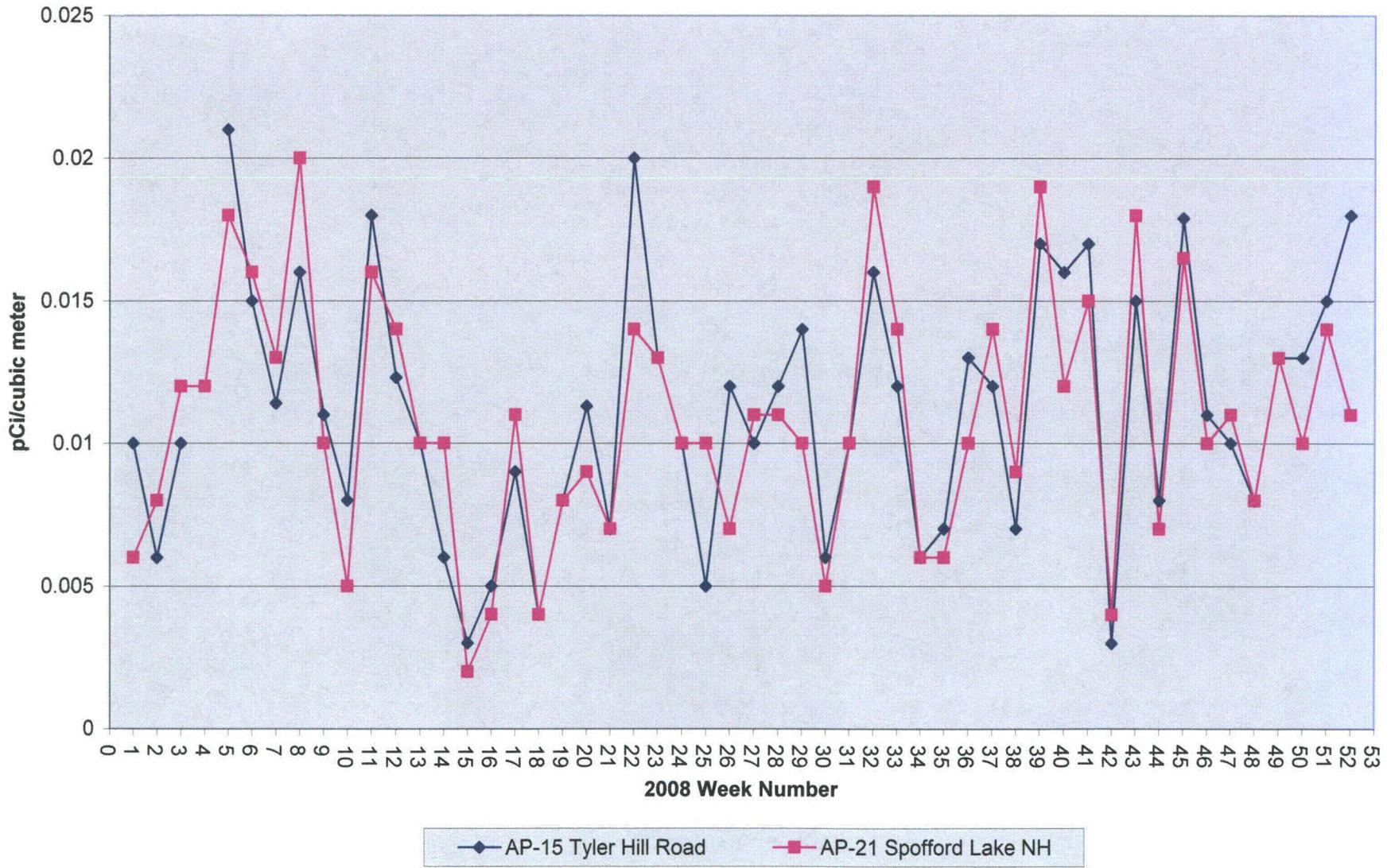


Figure 6.7 - Gross Beta Measurements of Air Particulate Filters

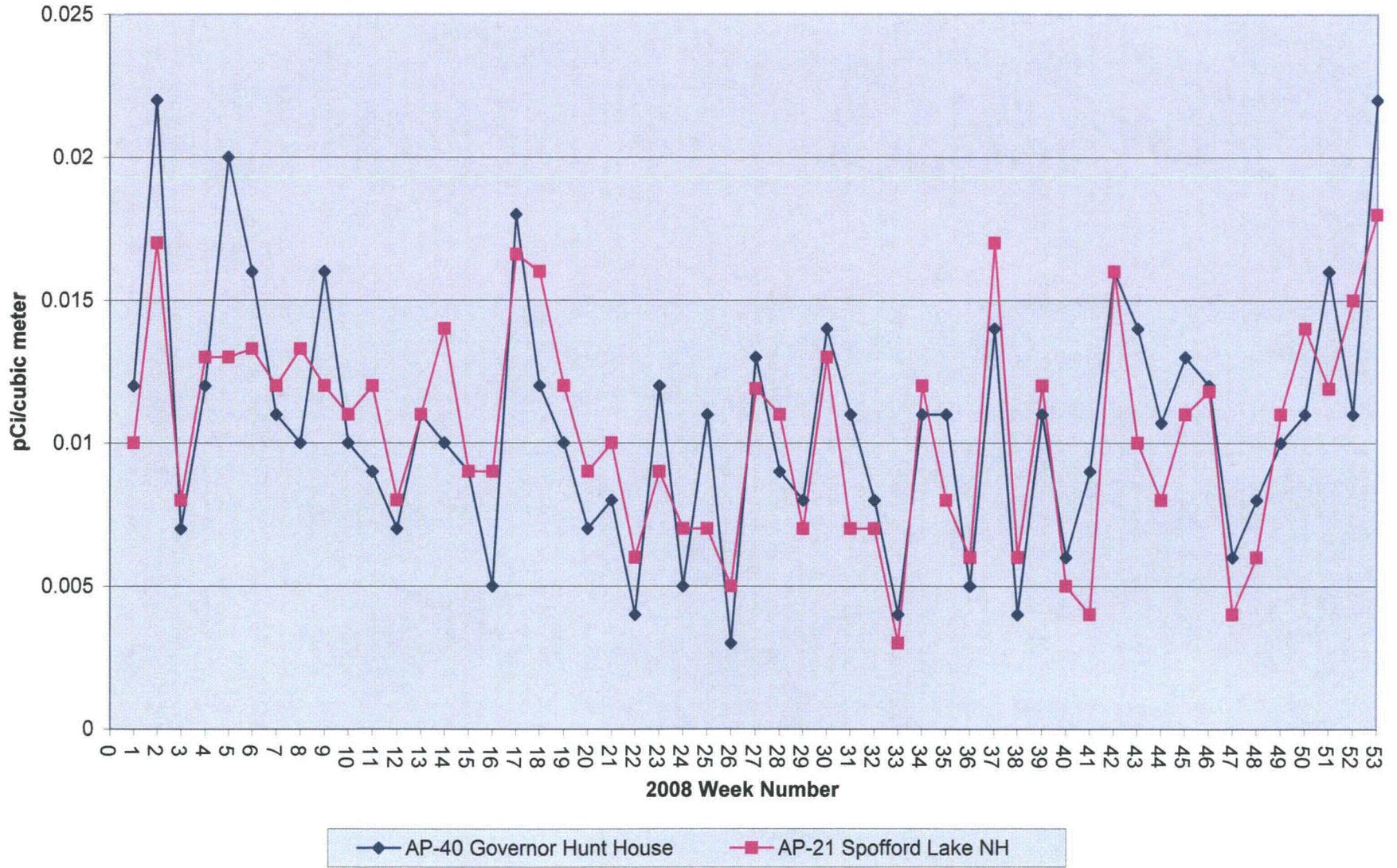


Figure 6.8 - Gross Beta Measurements on River Water Semi-Annual Average Concentration

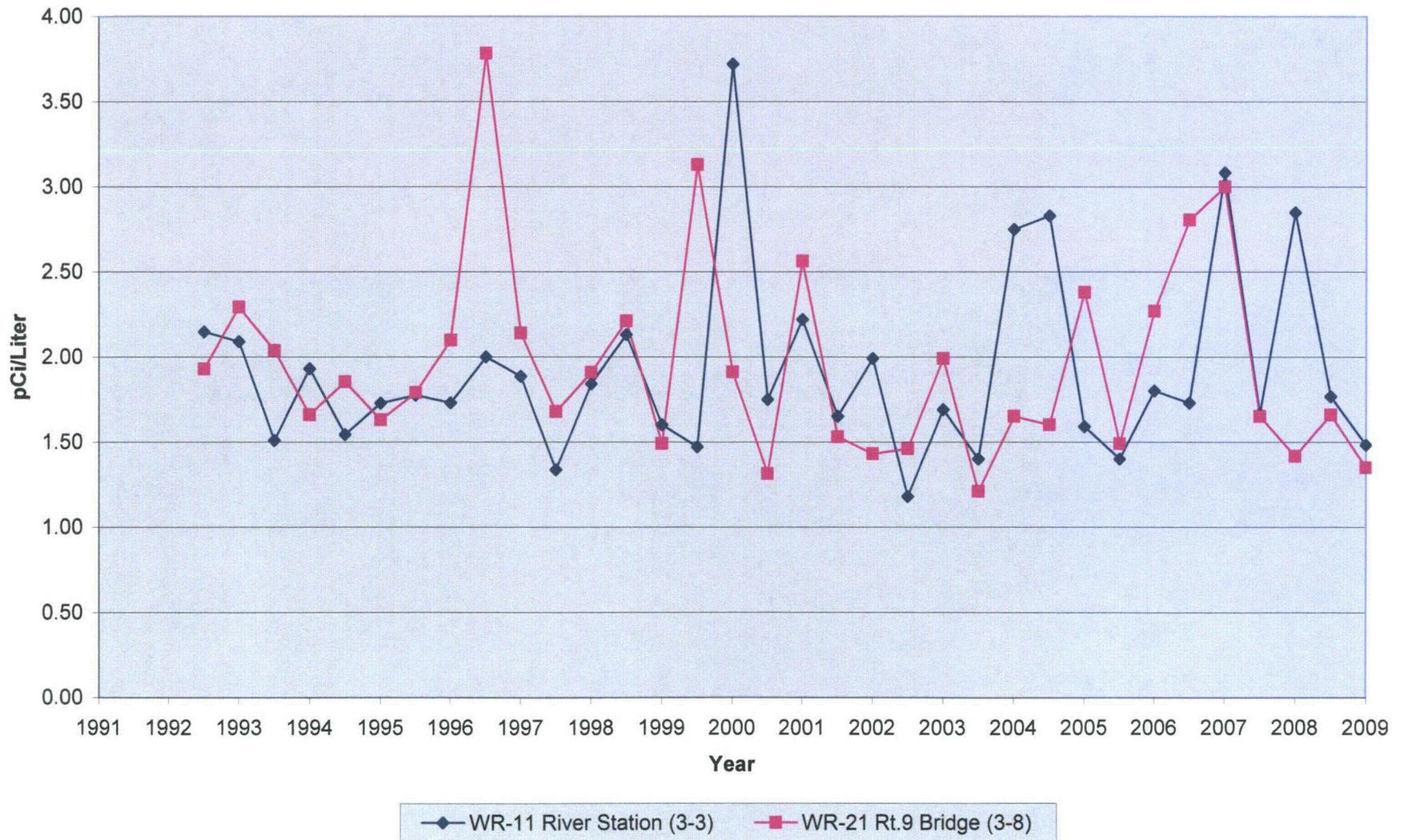


Figure 6.9 - Gross Beta Measurements on Ground Water Semi-Annual Average Concentrations

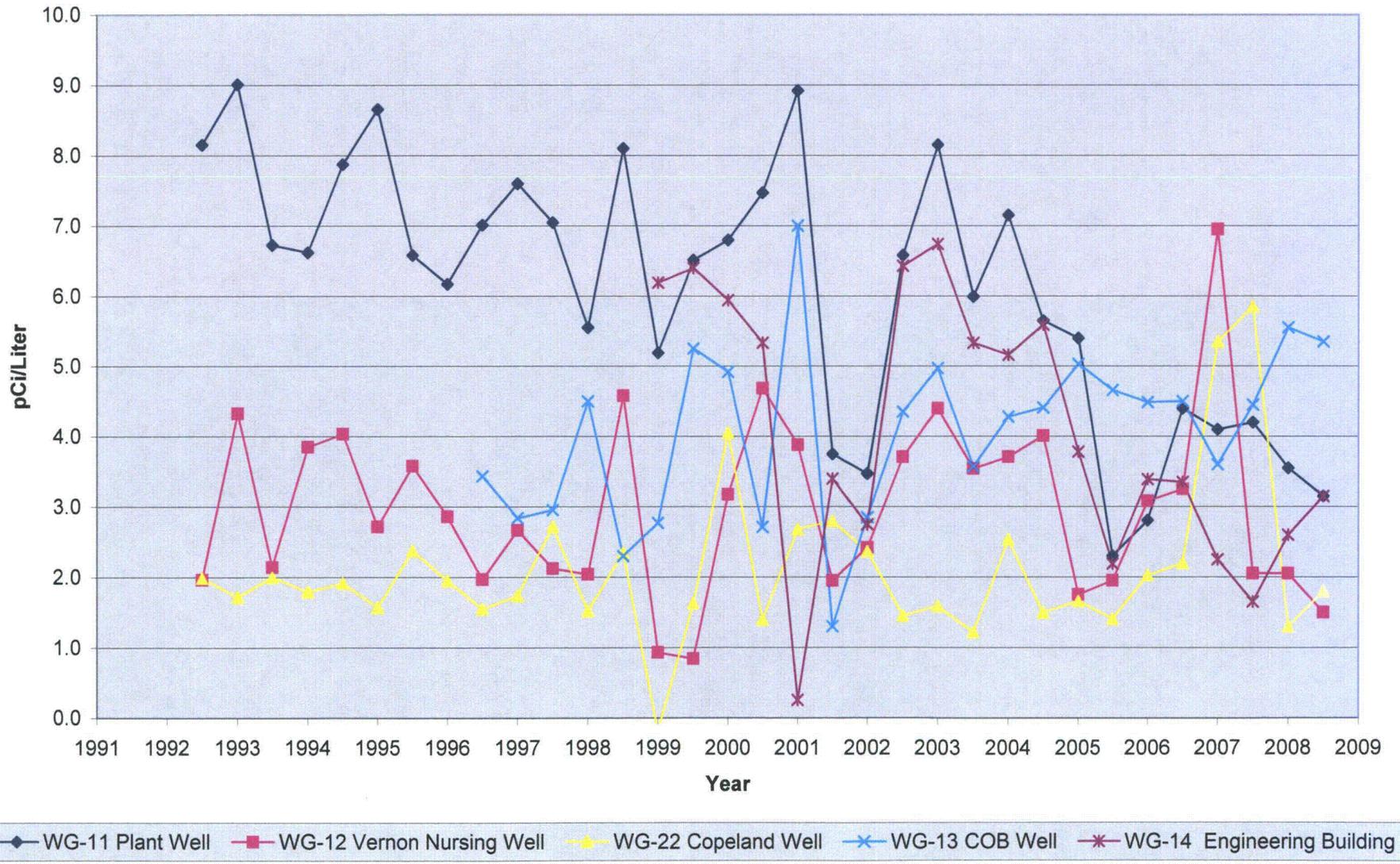


Figure 6.10 - Cesium 137 in Milk - Annual Average Concentration

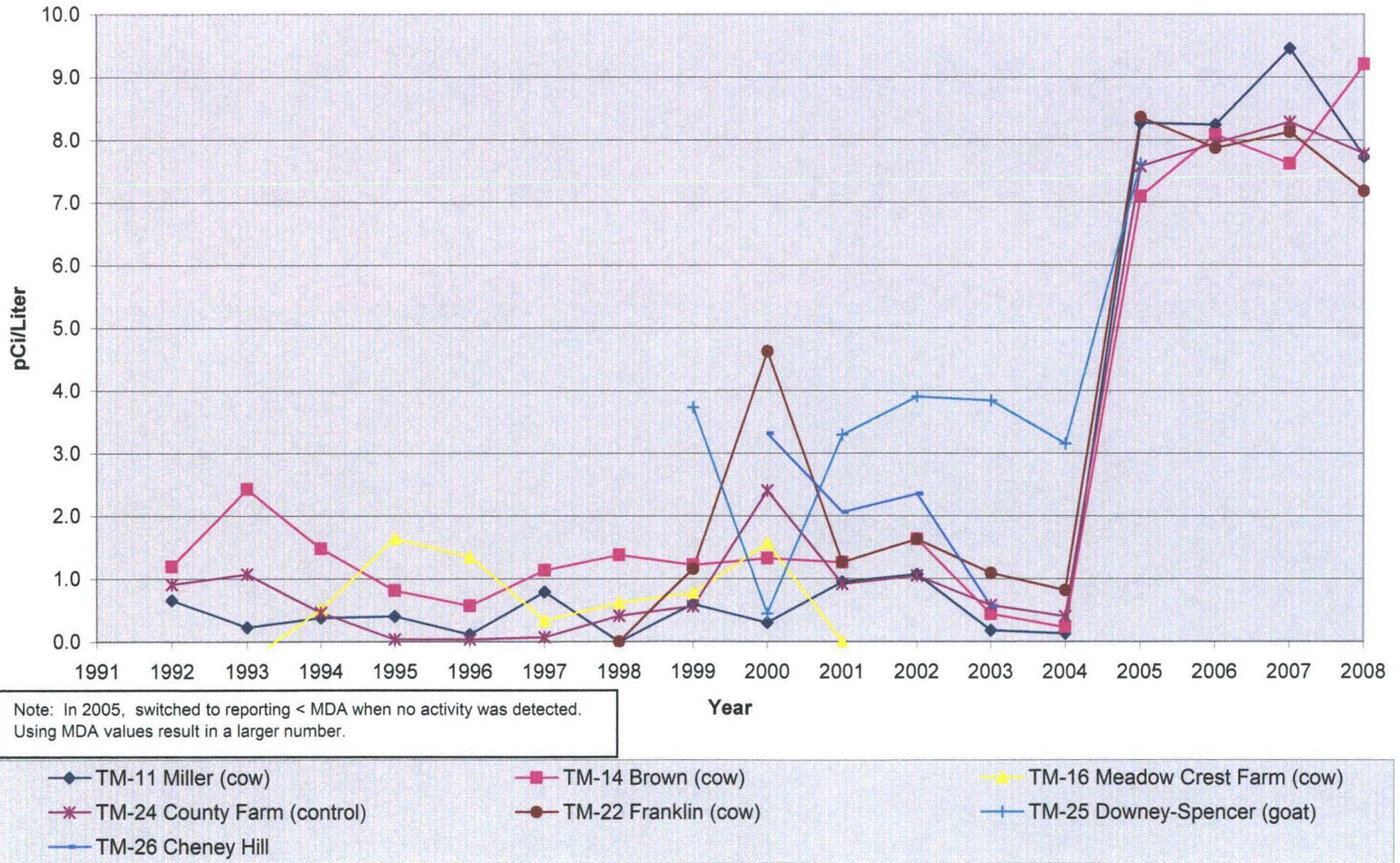
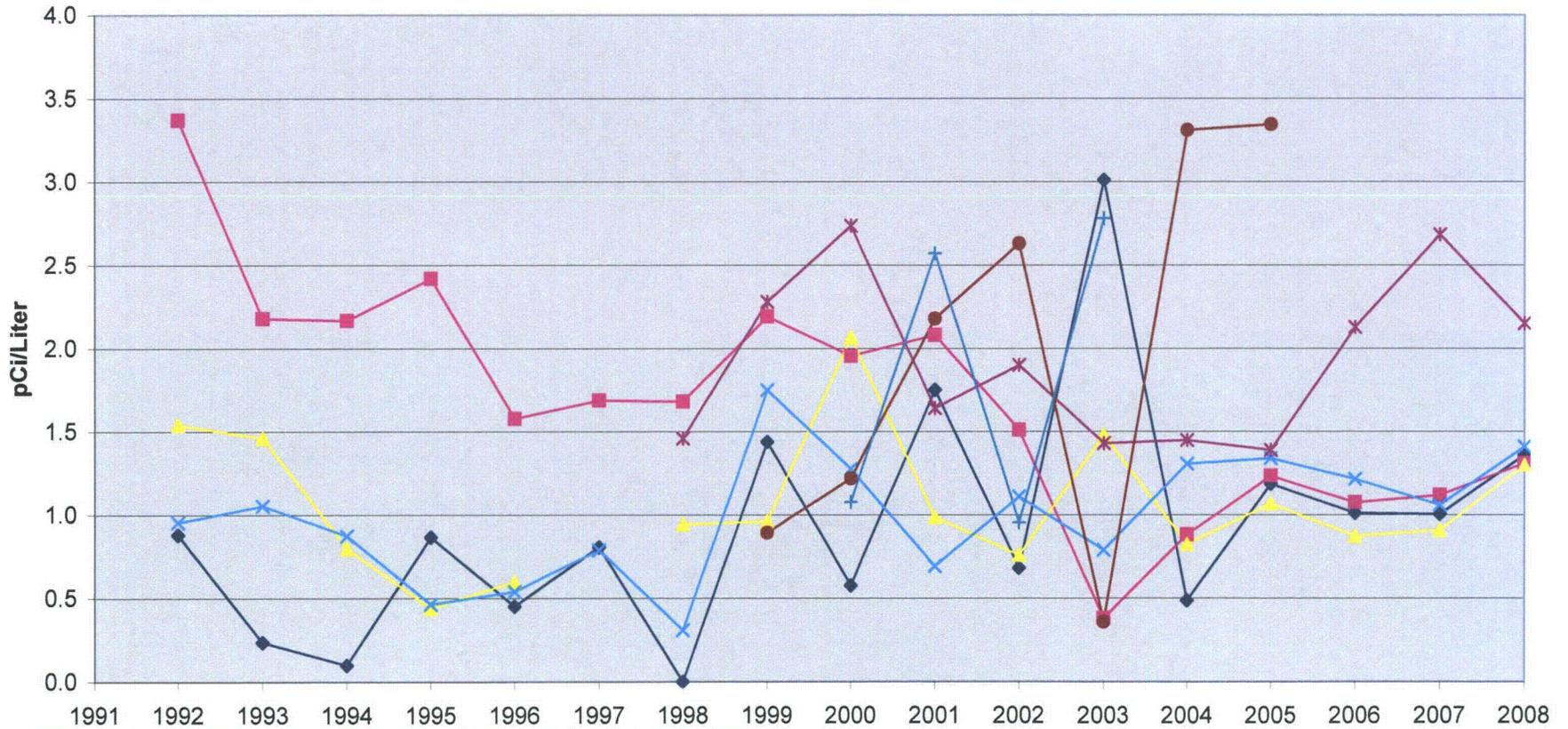


Figure 6.11 - Strontium 90 in Milk - Annual Average Concentrations



Note: In 2005, switched to reporting < MDA when no activity was detected. Averages include the MDAs and positive values. Using MDA values result in a larger number.

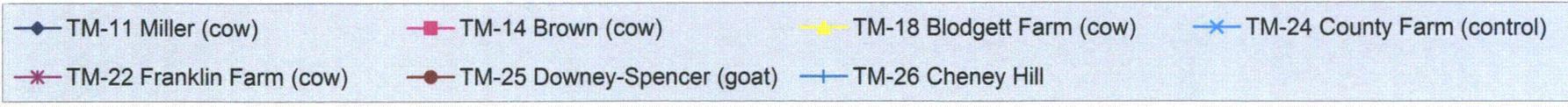
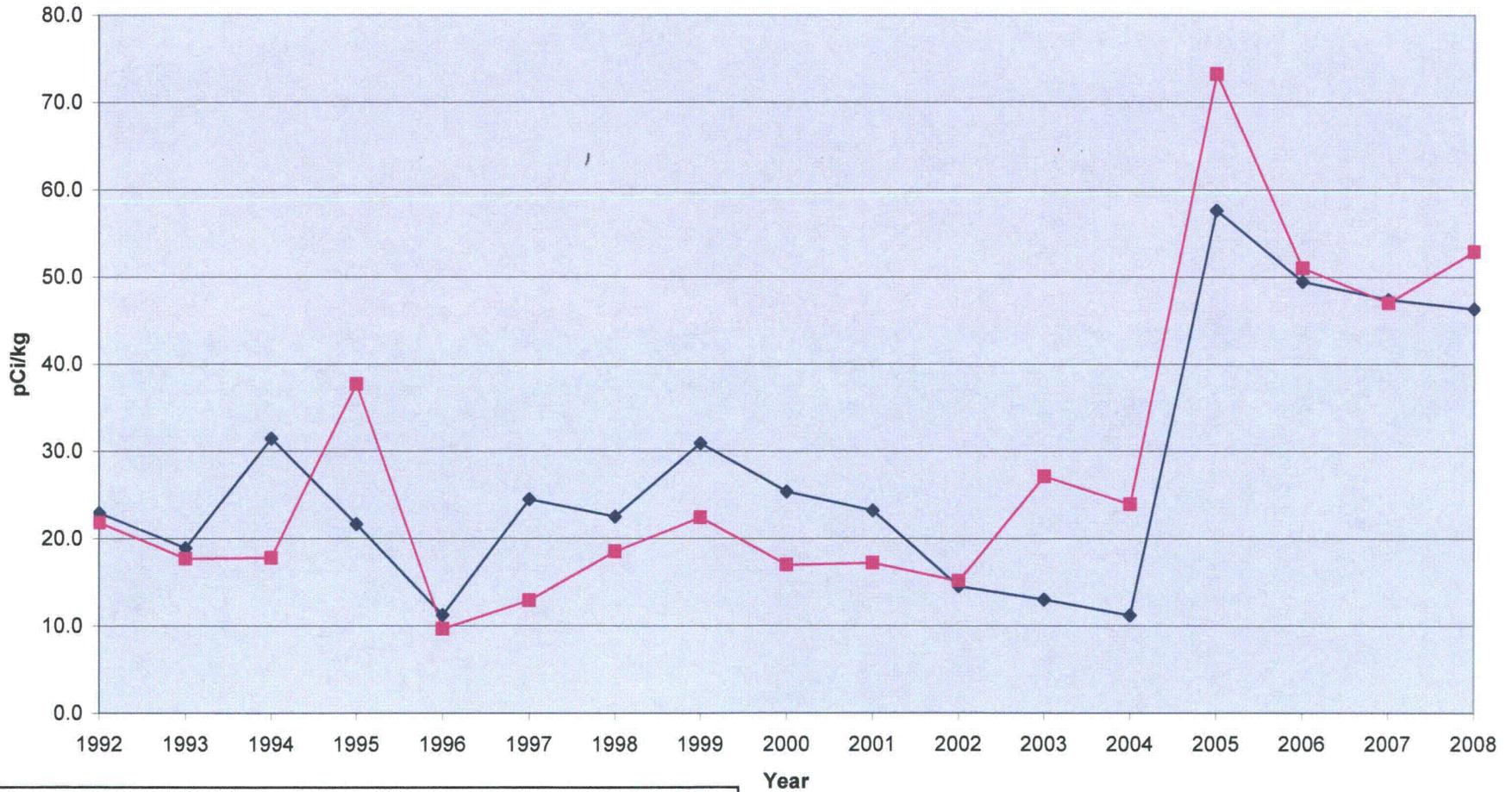


Figure 6.12 - Cesium 137 in Fish - Annual Average Concentrations



Note: In 2005 switched to reporting < MDA when no activity was detected. Using MDA values result in a larger number.

◆ FH-11 Vernon Pond ■ FH-21 Rt. 9 Bridge (Control)

Figure 6.13 - Average Exposure Rate at Inner Ring, Outer Ring and Control TLDs

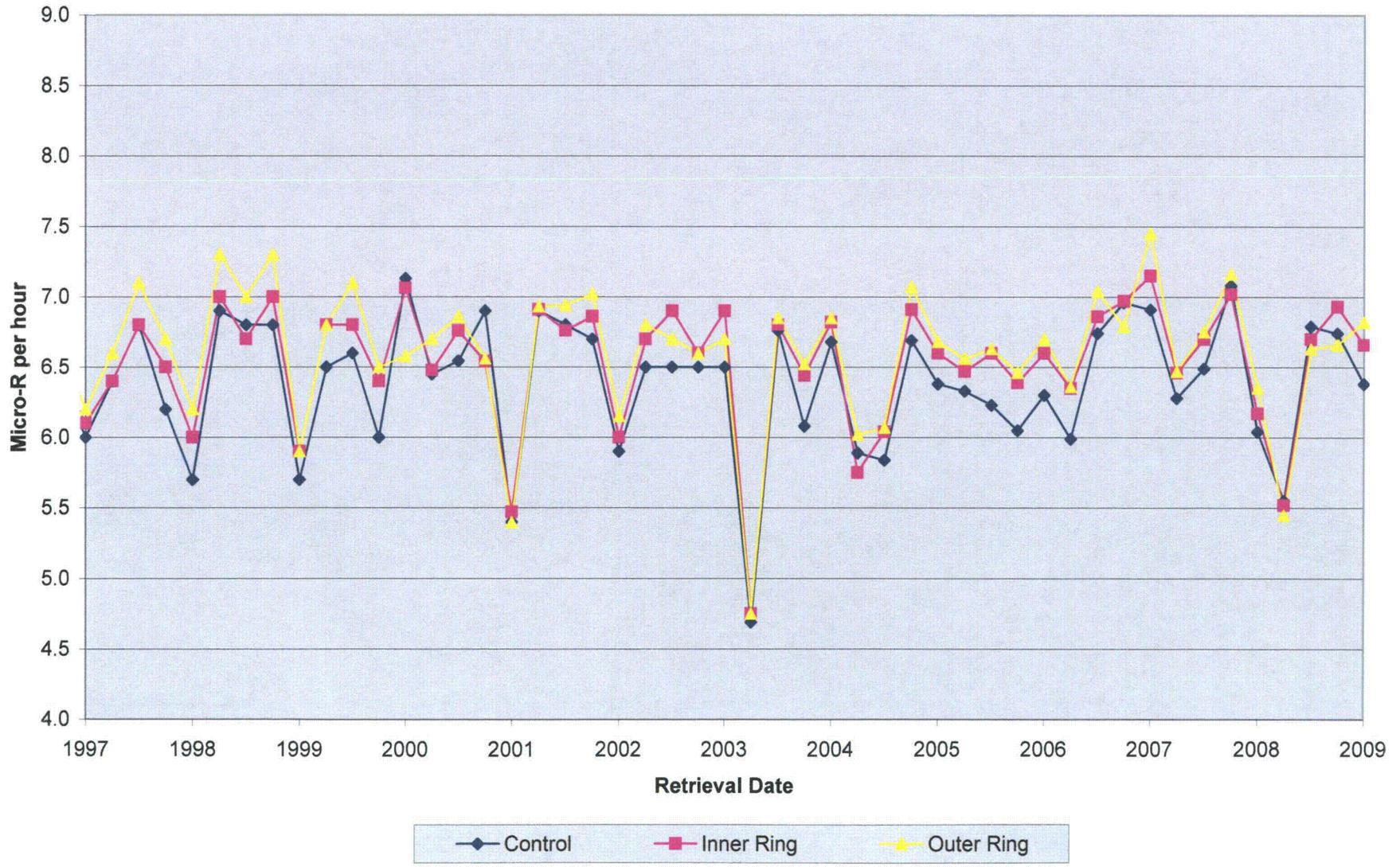


Figure 6.14 - Exposure Rate at Indicator TLDs, DR01-03

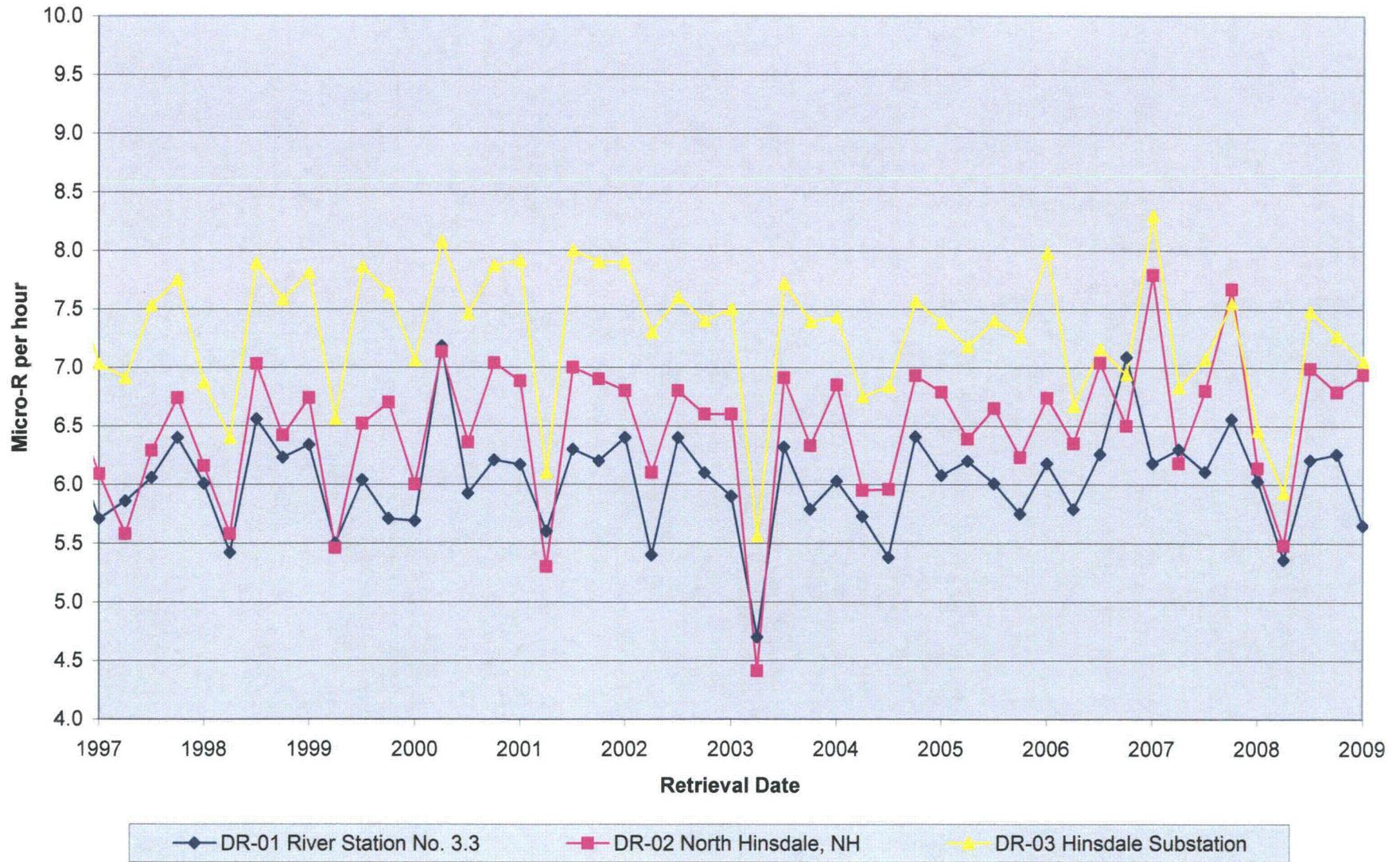


Figure 6.15 - Exposure Rate at Indicator TLDs, DR06 & DR-50

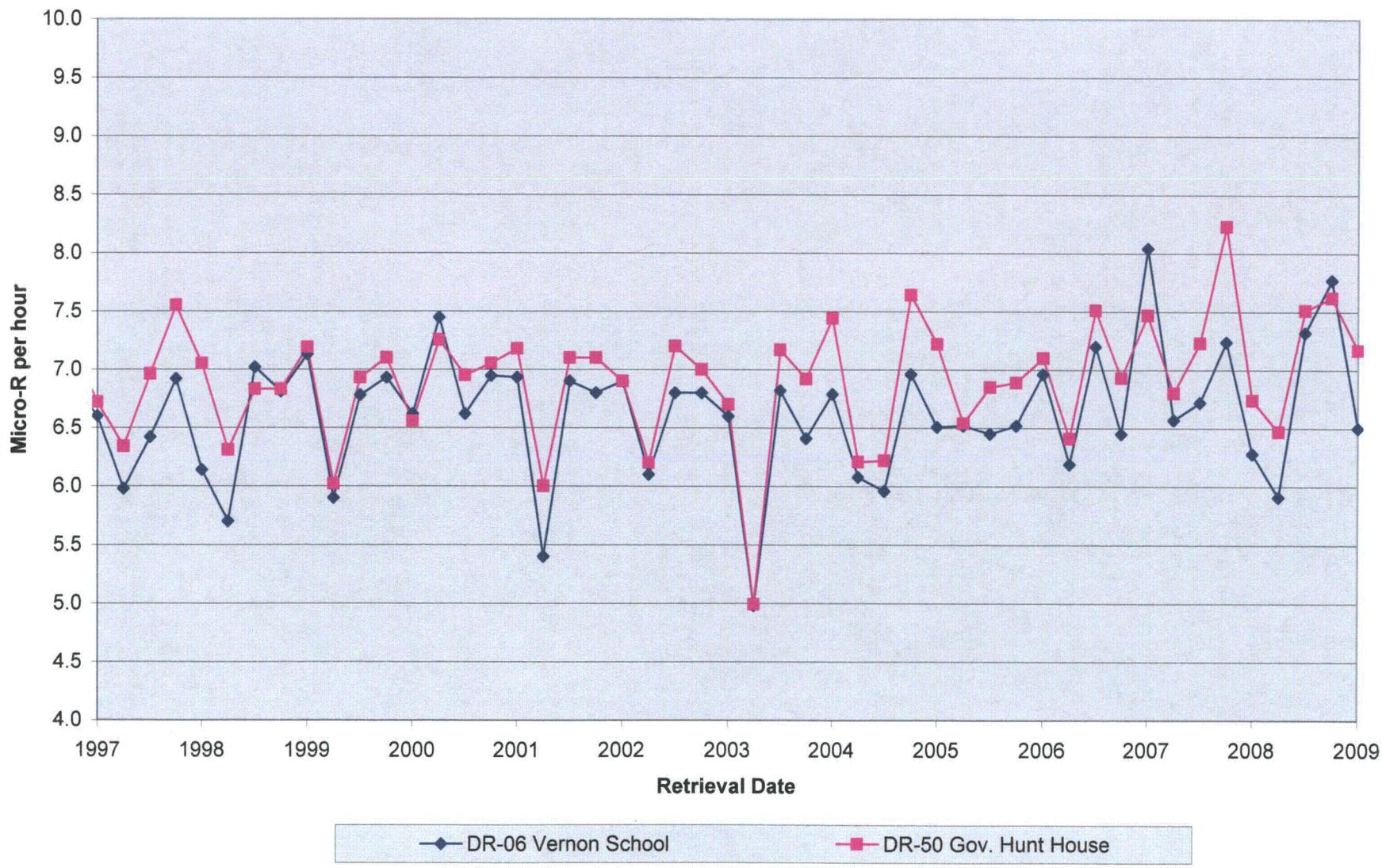


Figure 6.16 - Exposure Rate at Site Boundary TLDs DR07, 08, 41 & 42

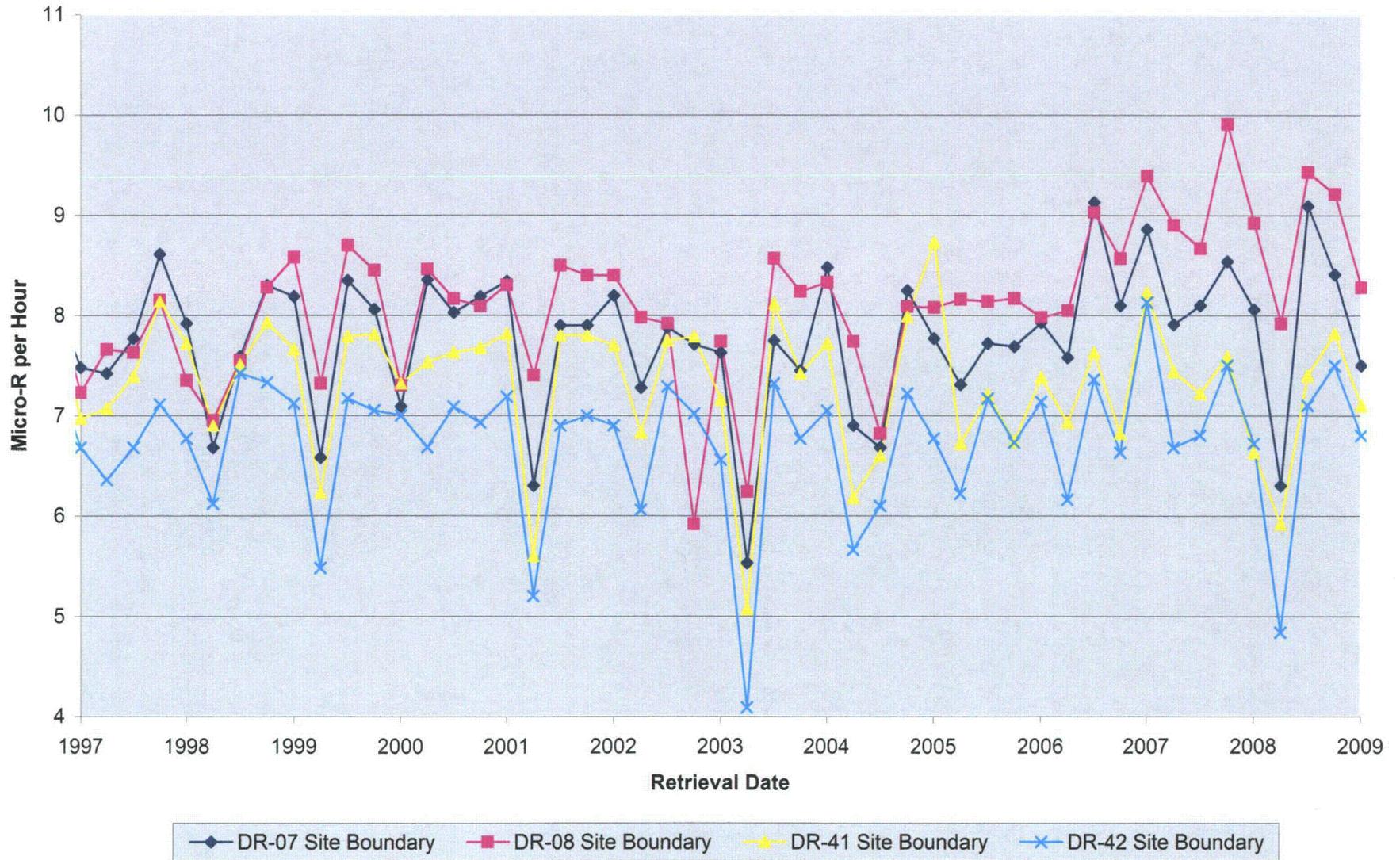


Figure 6.17 - Exposure Rate at Site Boundary TLDs - DR43 thru 46

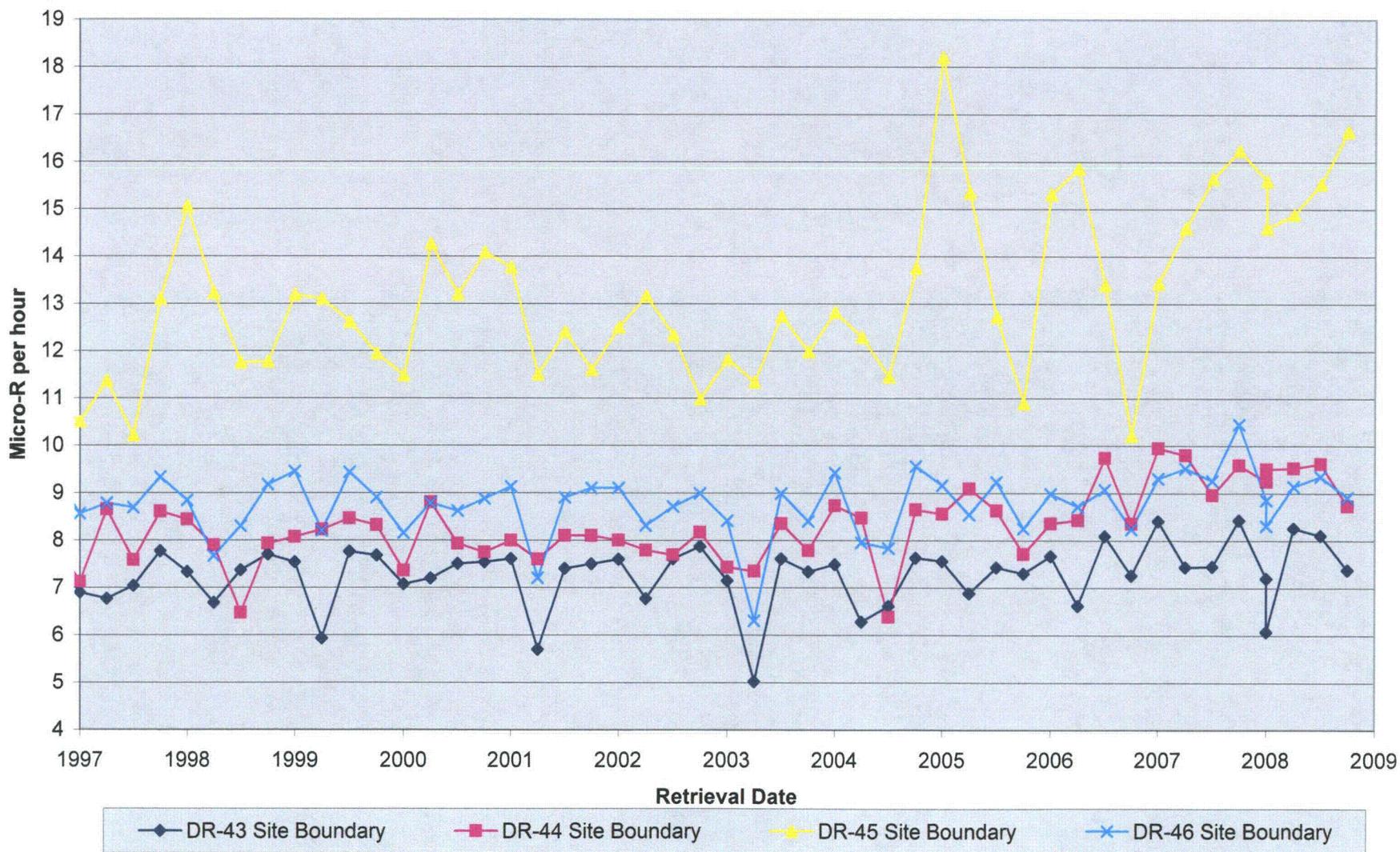


Figure 6.18 - Exposure Rate at Site Boundary TLDs DR47-49 & 51-53

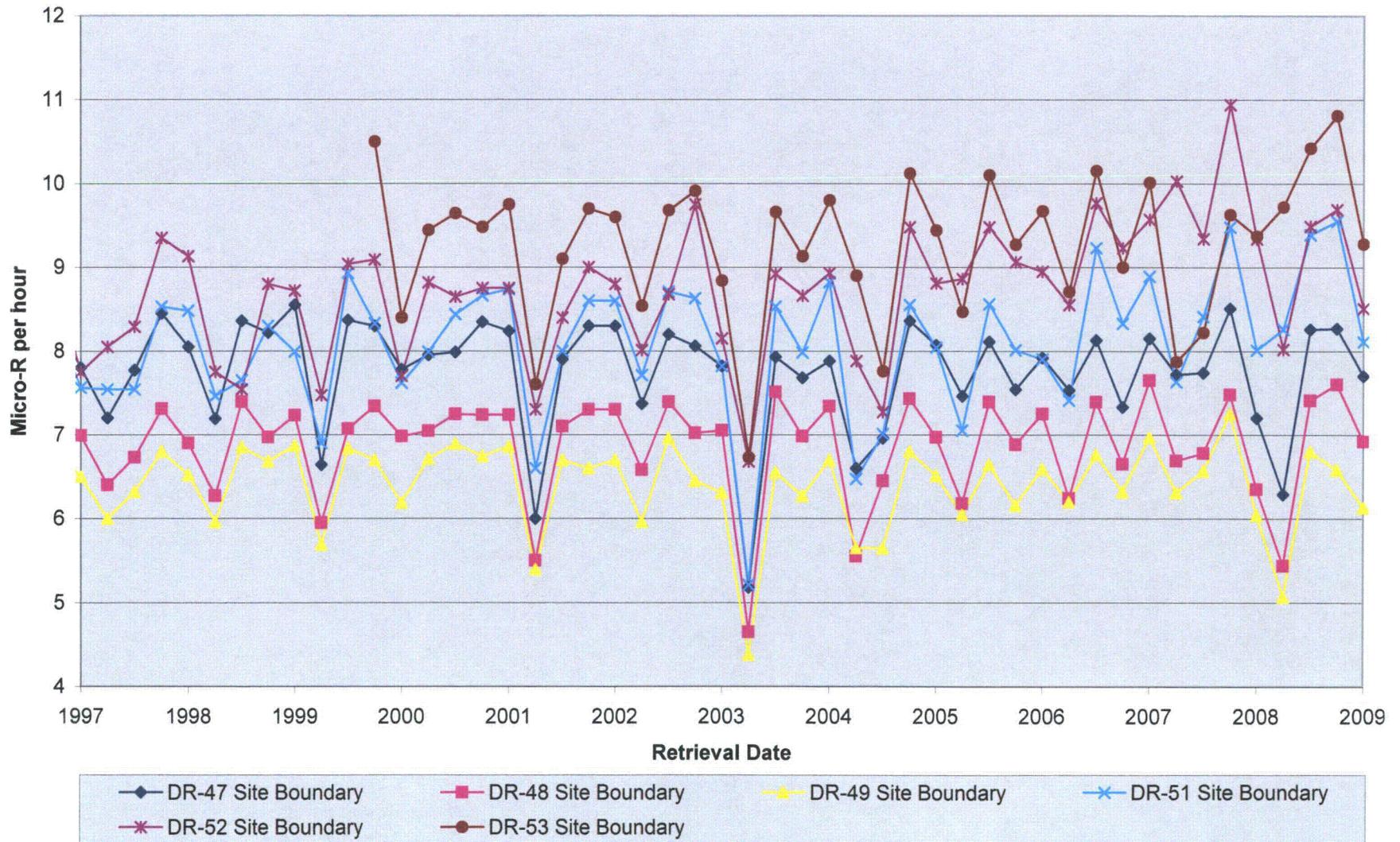


Figure 6.19 - Exposure Rate at Inner Ring TLDs DR09, 11, 13 & 15

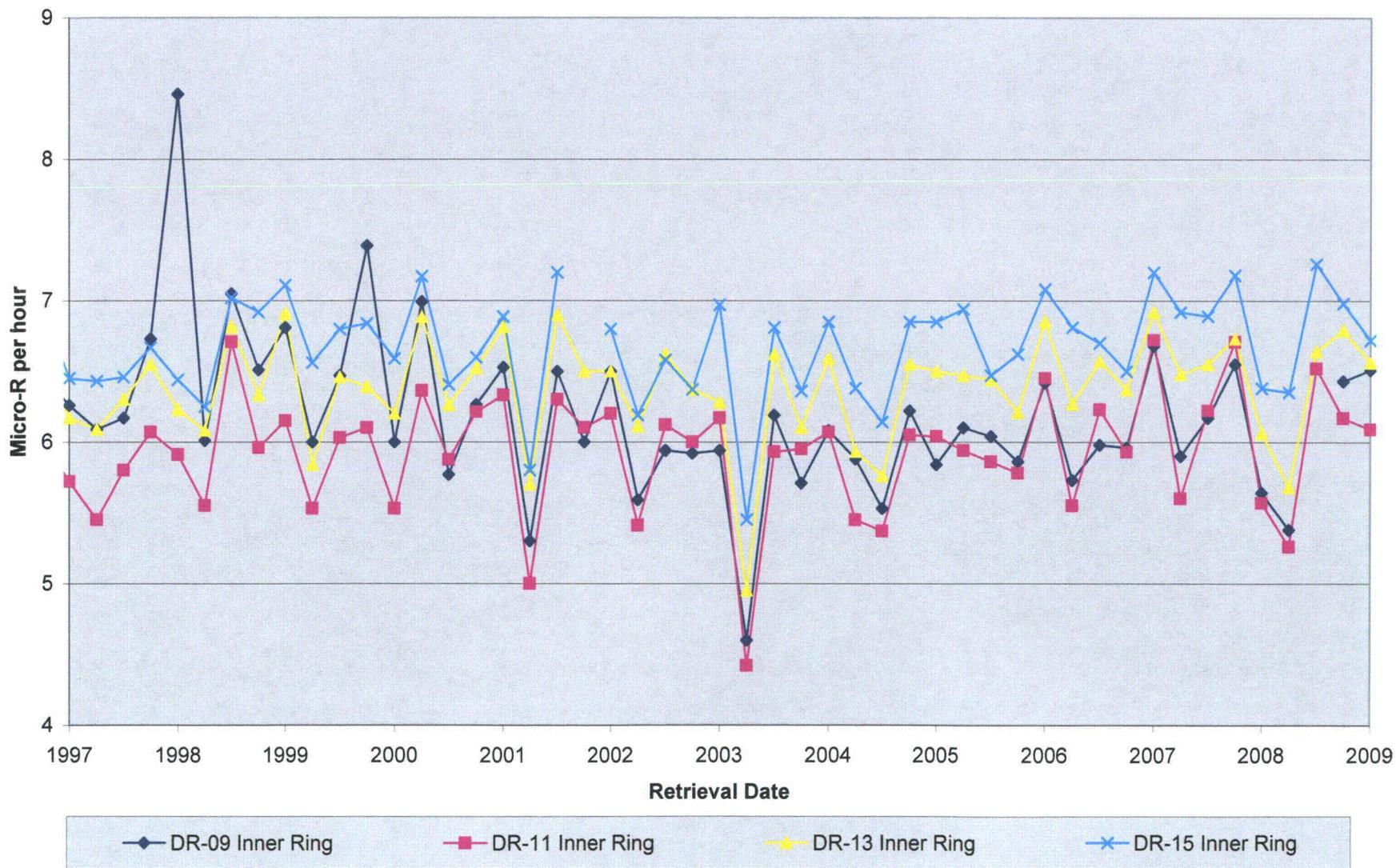


Figure 6.20 - Exposure Rate at Inner Ring TLDs DR17, 19, 21 & 23

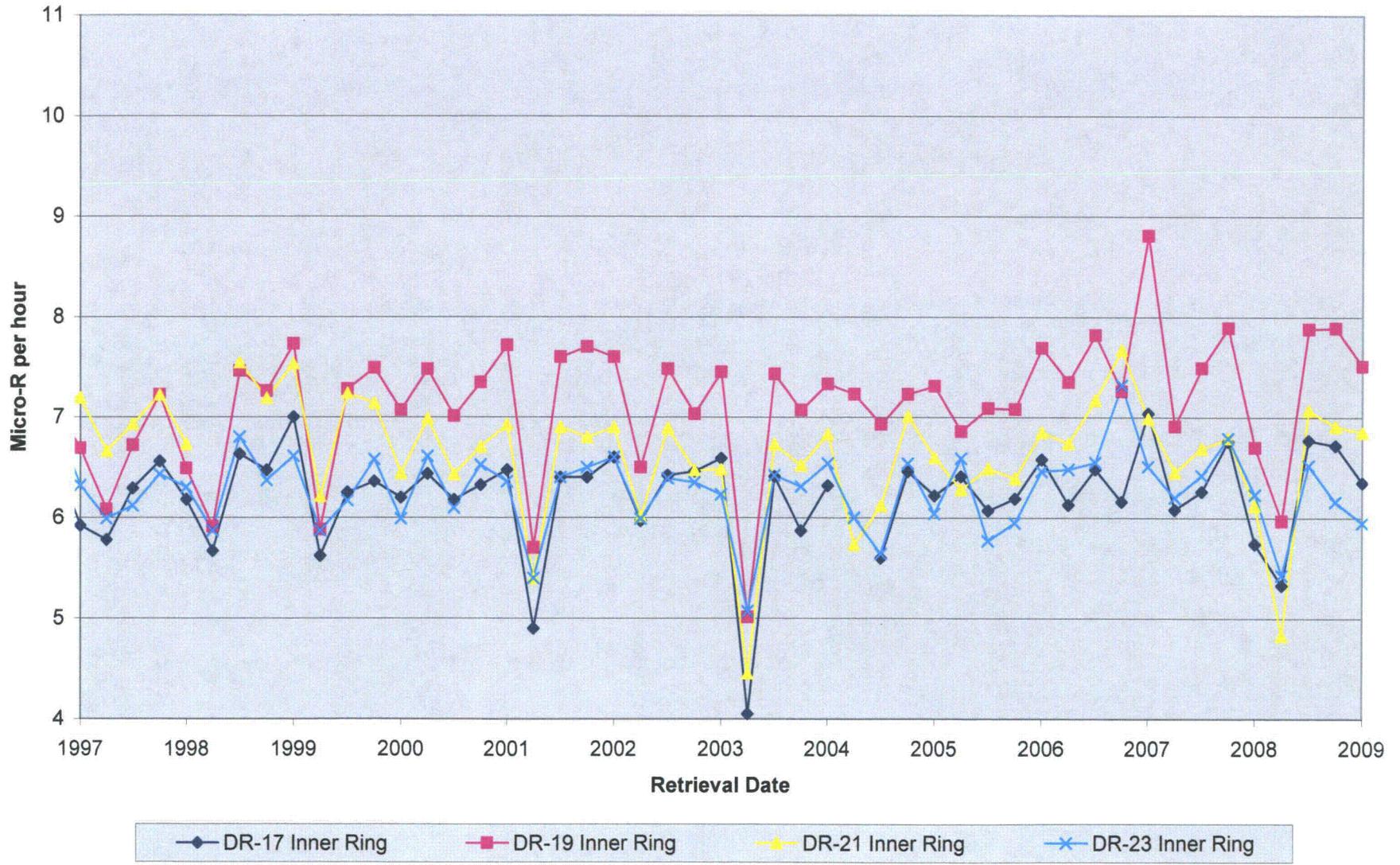


Figure 6.21 - Exposure Rate at Inner Ring TLDs DR25, 27, 29 & 31

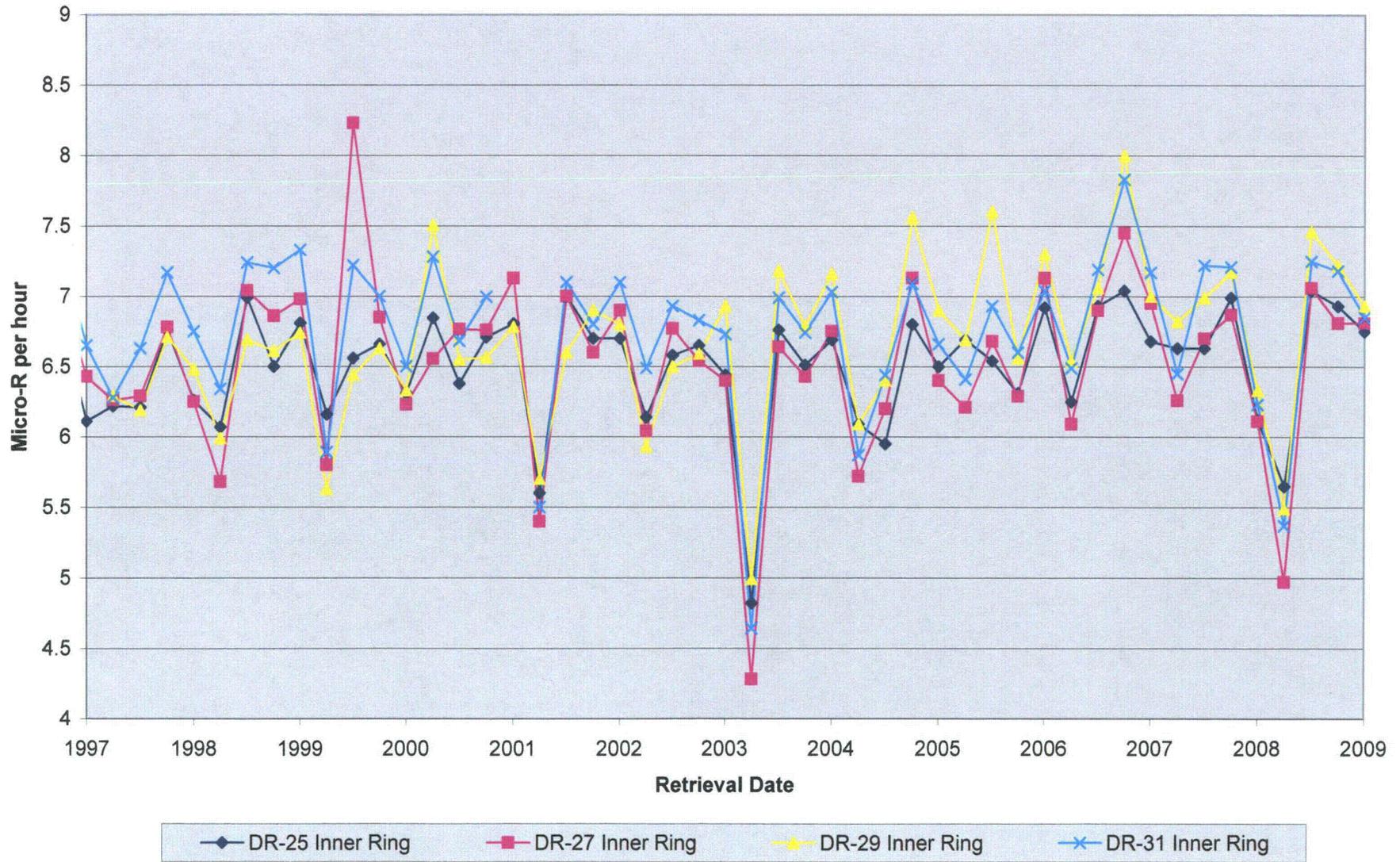


Figure 6.22 - Exposure Rate at Inner Ring TLDs DR33, 35, 37 & 39

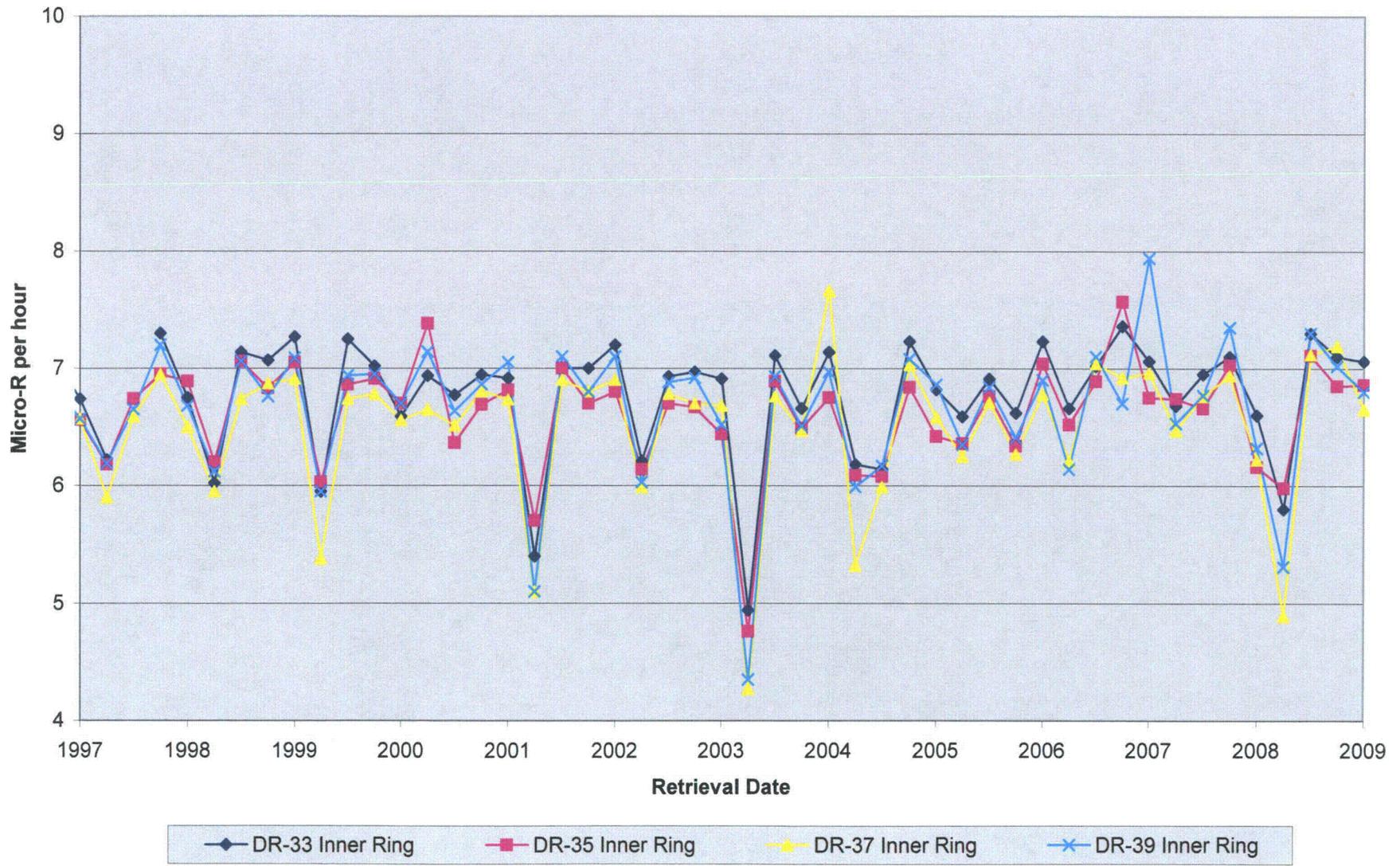


Figure 6.23 - Exposure Rate at Outer Ring TLDs DR10, 12, 14 & 16

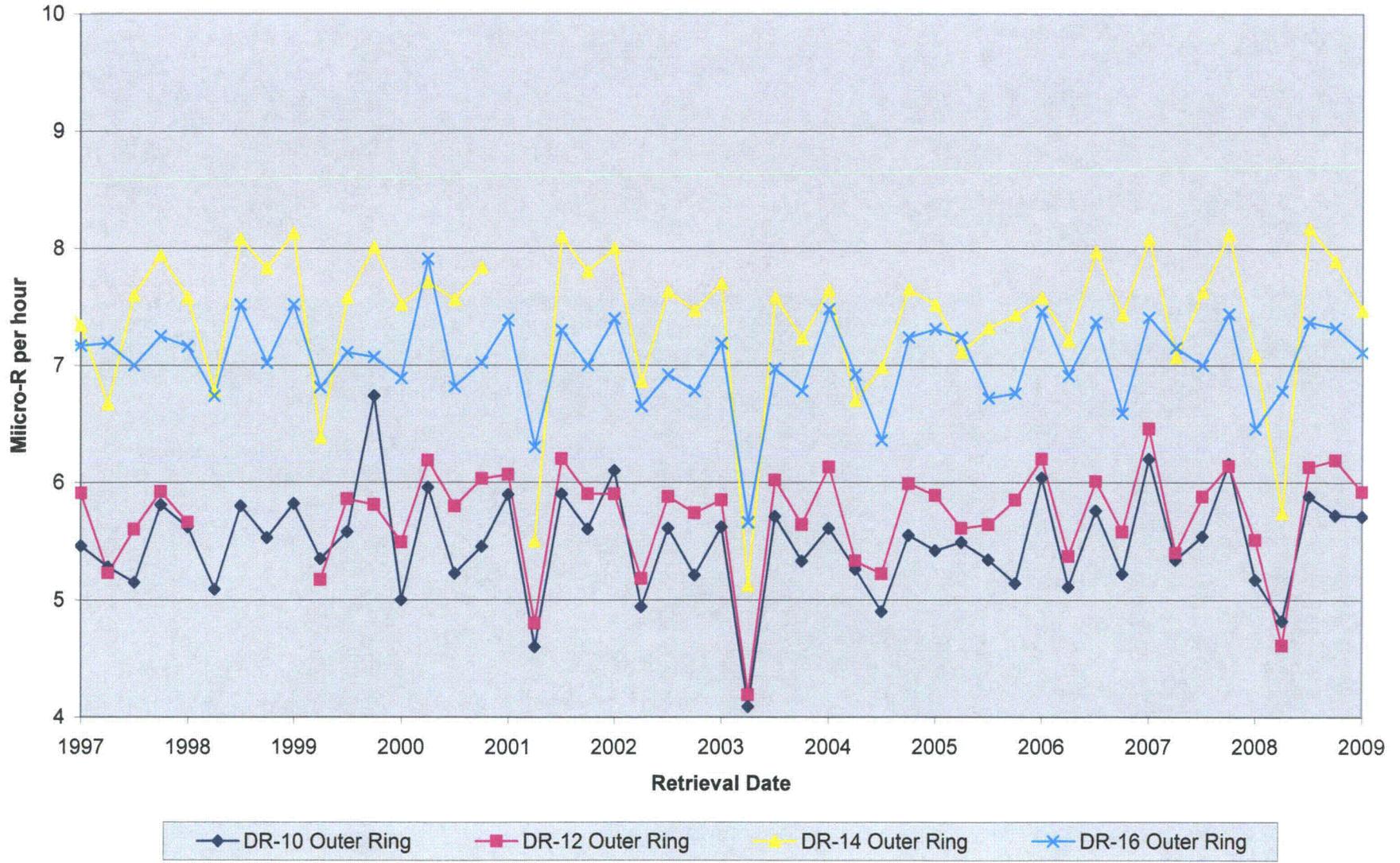


Figure 6.24 - Exposure Rate at Outer Ring TLDs DR18, 20, 22 & 24

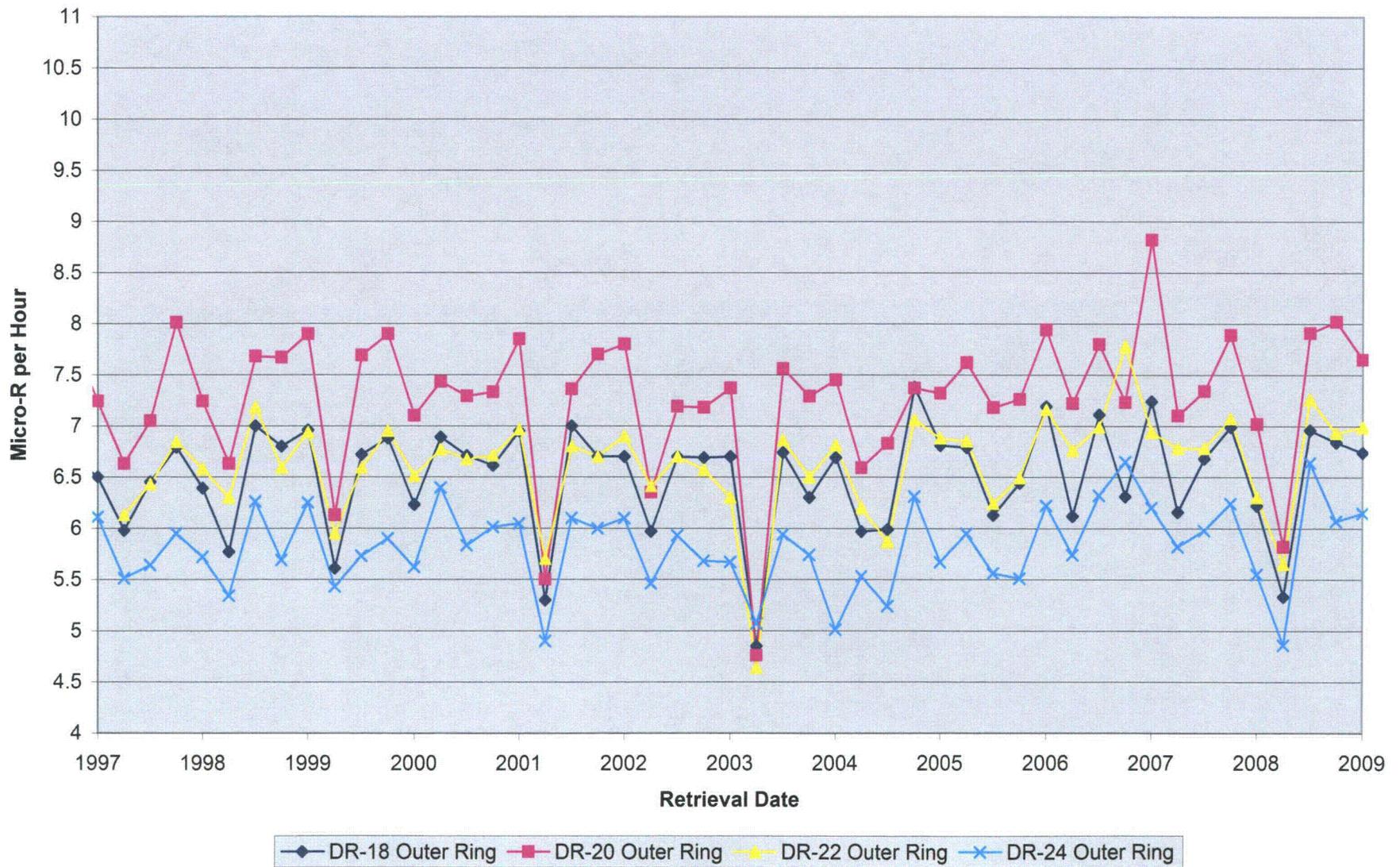


Figure 6.25 - Exposure Rate at Outer Ring TLDs DR26, 28, 30 & 32

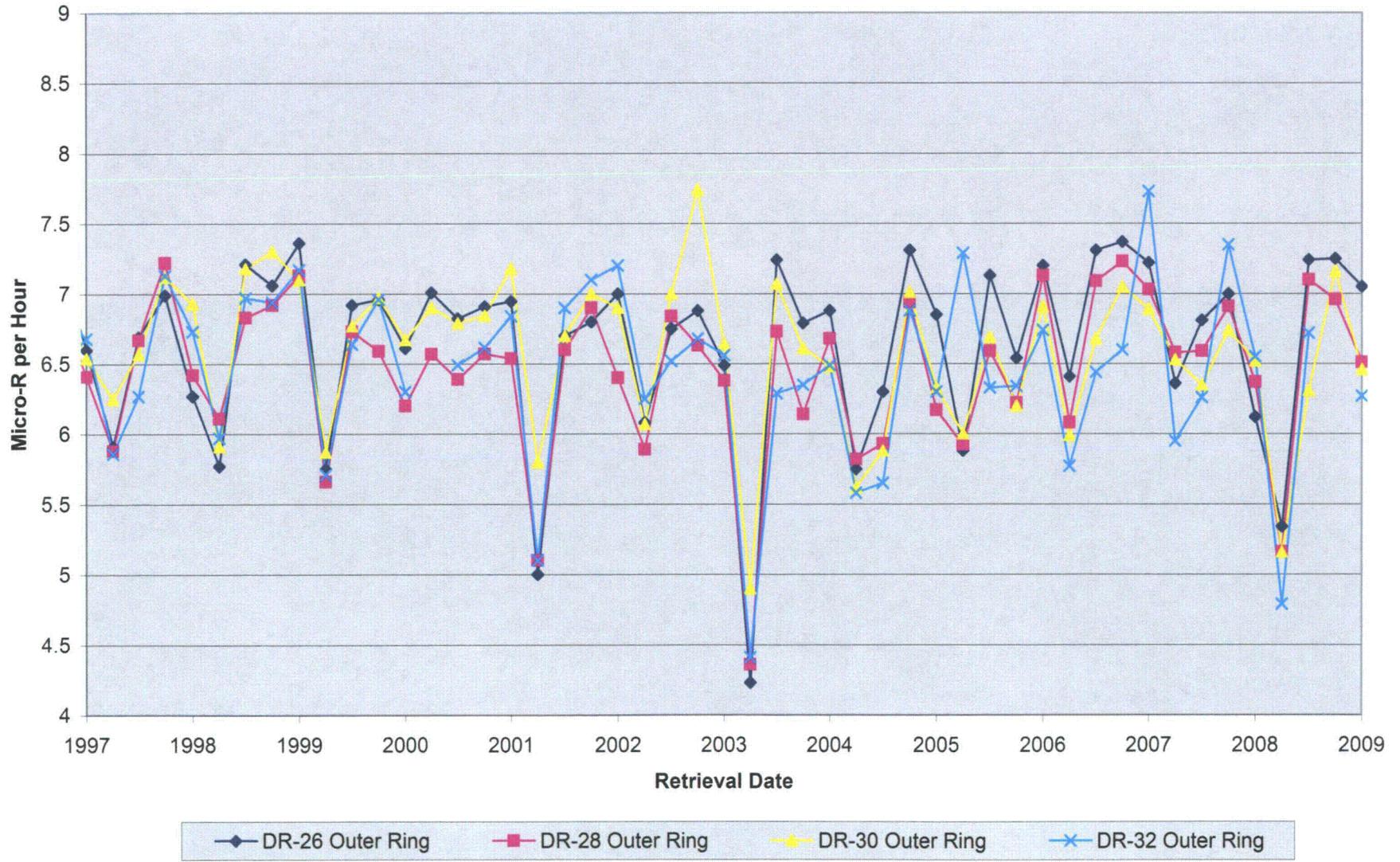


Figure 6.26 - Exposure Rate at Outer Ring TLDs DR 34, 36, 38 & 40

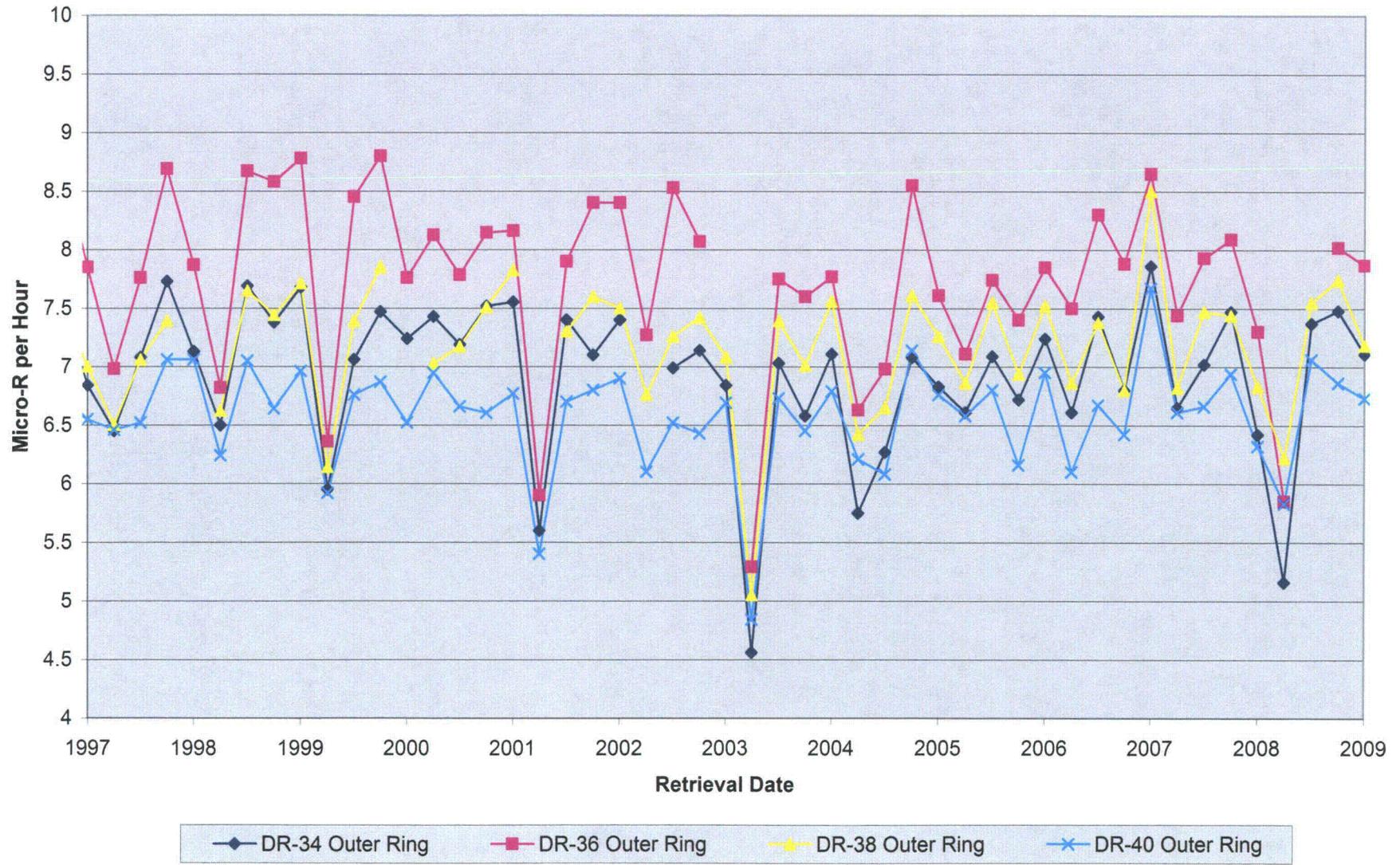
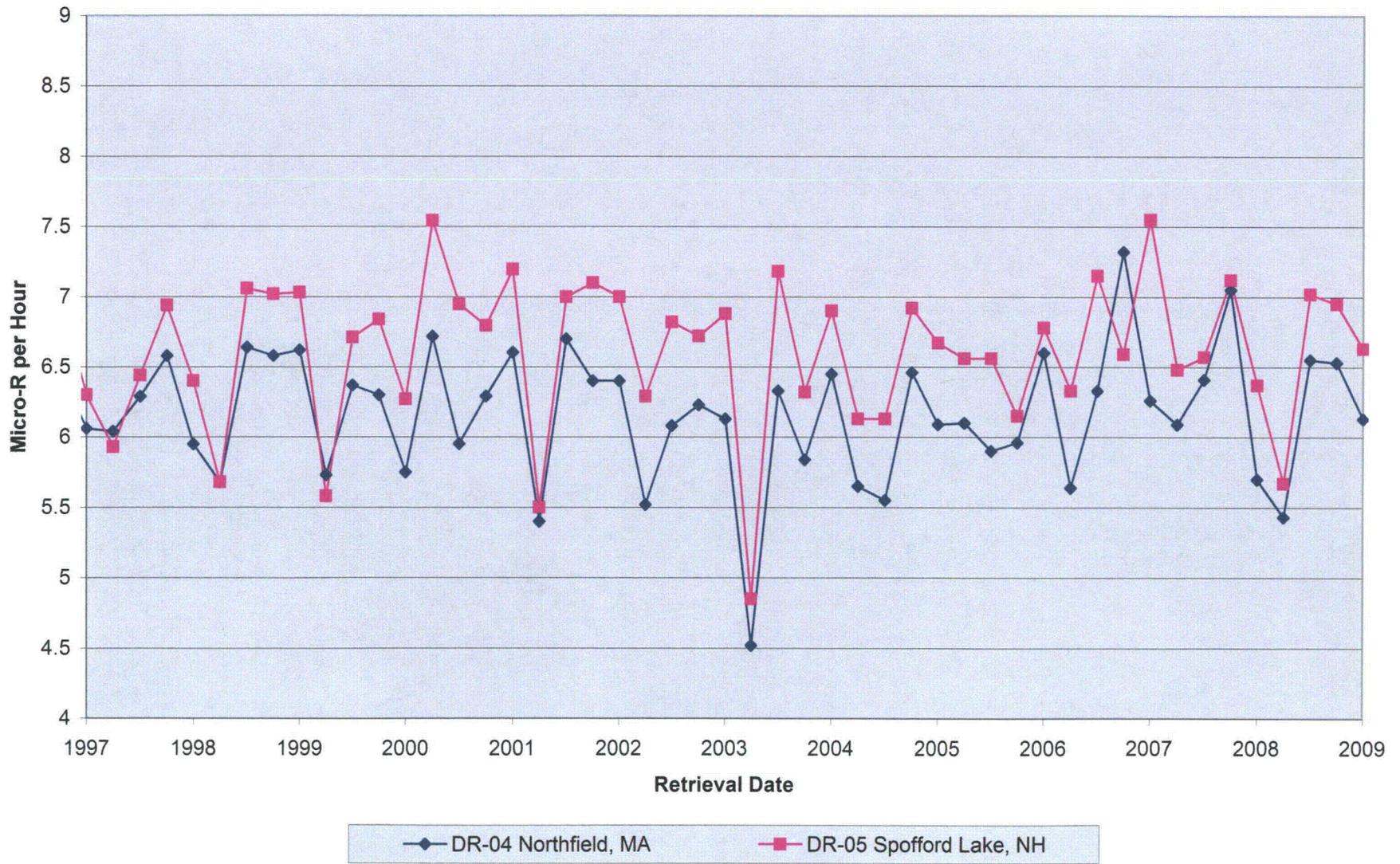


Figure 6.27 - Exposure Rate at Control TLDs DR04 & 05



7 QUALITY ASSURANCE PROGRAMS

7.1 AREVA NP Environmental Laboratory

7.1.1 The quality assurance program at the AREVA NP Environmental Laboratory (E-LAB) is designed to serve two overall purposes: 1) Establish a measure of confidence in the measurement process to assure the licensee, regulatory agencies and the public that analytical results are accurate and precise; and 2) Identify deficiencies in the sampling and/or measurement process to those responsible for these operations so that corrective action can be taken. Quality assurance is applied to all steps of the measurement process, including the collection, measurement and reporting of data, as well as the record keeping of the final results. Quality control, as part of the quality assurance program, provides a means to control and measure the characteristics of the measurement equipment and processes, relative to established requirements. The E-LAB employs a comprehensive quality assurance program designed to monitor the quality of analytical processing to ensure reliable environmental monitoring data. The program includes the use of controlled procedures for all work activities, a nonconformance and corrective action tracking system, systematic internal audits, audits by external groups, a laboratory quality control program, and staff training by the Laboratory QA Officer and a third party cross check program administered by Analytics, Inc. Together these programs are targeted to supply QC/QA sources at 5% of the client sample analysis load. In addition a blind duplicate program is conducted through client environmental monitoring programs.

7.1.2 Environmental TLD Quality Assurance Program

Performance documentation of the routine processing of the Panasonic environmental TLDs (thermoluminescent dosimeter) program at the E-LAB is provided by the dosimetry quality assurance testing program. This program includes independent third party performance testing by Battelle Pacific Northwest Labs (typically semi-annually) and internal performance testing conducted by the Laboratory QA Officer. Under these programs, sets of six dosimeters are irradiated to ANSI specified testing criteria and submitted for processing as "unknowns." The bias and precision of TLD processing is measured against this standard and is used to indicate trends and changes in performance. Instrumentation checks, although routinely performed and representing between 5-10% of the TLDs processed, are not presented in this report.

One hundred and two performance tests were conducted in 2008 by the E-LAB (In-house and Third party). These tests were made on seventeen separate sets of six dosimeters. All of the seventeen TLD test sets passed the mean bias criteria of

±20.1%. Of the one hundred and two individual measurements, 100% of the dosimeter evaluations met the E-LAB Internal Acceptance Criteria for bias (±20.1%) and precision (±12.8%). Third Party QC results are summarized below.

Percentage of Individual Analyses that passed E-LAB Internal Criteria

Dosimeter Type	Number Tested	% Passed Bias Criteria	% Passed Precision Criteria
Panasonic Environmental	102	100	100

Summary of Third Party Testing

Dosimeter Type	Exposure Period	ANSI Category	% (Bias ± SD)
Panasonic Environmental	First Half 2008	II, high energy	2.7 +/- 1.0
Panasonic Environmental	Second Half 2008	II, high energy	-1.1 +/- 1.4

* American National Standards Institute (ANSI) Performance Statistic as referenced in the Dosimetry Services Semi-Annual QA Status Report.

Note: Results are expressed as the delivered exposure for environmental TLD. ANSI HPS N13.29-1995 (Draft) Category II, High energy photons (Cs-137 or Co-60).

7.2 Teledyne Brown Engineering Laboratory –Environmental Services (TBE-SE)

7.2.1 Operational Quality Control Scope

7.2.1.1 Inter-laboratory

The TBE-ES Laboratory QC Program is designed to monitor the quality of analytical processing associated with environmental, effluent (10CFR Part 50), and waste characterization (10CFR Part 61) samples.

Quality Control of environmental radioanalyses involves the internal process control program and independent third party programs administered by Analytics, Inc and Environmental Resource Associates (ERA).

TBE-ES participates in the Quality Assessment Program (QAP) administered by the Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP). The MAPEP is a set of performance evaluation samples (e.g. water, soil, air filters, etc.) designed to evaluate the ability and quality of analytical facilities performing sample measurements which contain hazardous and radioactive (mixed) analytes.

Quality Control for radioanalyses during this reporting period was divided among internal process check samples, third party process checks prepared by Analytics, Inc. (which was submitted by users or secured directly by TBE-ES for QC purposes), ERA, and DOE's MAPEP.

7.2.1.2 Intra-laboratory

The internal Quality Control program is designed to include QC functions such as instrumentation checks (to ensure proper instrument response), blank samples (to which no analyte radioactivity has been added), instrumentation backgrounds, duplicates, as well as overall staff qualification analyses and process controls. Both process control and qualification analyses samples seek to mimic the media type of those samples submitted for analyses by the various laboratory clients. These process controls (or process checks) are either actual samples submitted in duplicate in order to evaluate the accuracy of laboratory measurements, or blank samples which have been "spiked" with a known quantity of a radioisotope that is of interest to laboratory clients. These QC samples, which represent either "single" or "double-blind" unknowns, are intended to evaluate the entire radiochemical and radiometric process.

To provide direction and consistency in administering the quality assurance program, TBE-ES has developed and follows an annual quality control and audit assessment schedule. The plan describes the scheduled frequency and scope of Quality Assurance and Control considered necessary for an adequate QA/QC program conducted throughout the year. The magnitude of the process control program combines both internal and external sources targeted at 5% of the routine sample analysis load.

7.2.1.3 QA Program (Internal and External Audits)

During each reporting period at least one internal assessment is conducted in accordance with the pre-established TBE-ES Quality Control and Audit Assessment Schedule. In addition, the laboratory may be audited by prospective customers during a pre-contract audit, and/or by existing clients who wish to conduct periodic audits in accordance with their contractual

arrangements. The Nuclear Utilities Procurement Issues Committee (NUPIC) conducts audits of TBE-ES as a function of a Utilities Radiological Environment Measurement Program (REMP).

TBE-ES Laboratory-Knoxville has successfully completed the New York State Department of Health's Environmental Laboratory Approval Program (NELAP), Nuclear Fuel Services, Manufacturing Sciences Corporation and State of Tennessee audits. These audits were each a comprehensive review of TBE-ES's Quality and Technical programs used to assess the laboratory's ability to produce accurate and defensible data. No significant deficiencies, which would adversely impact data quality, were identified during any of these audits. Administrative findings identified during these inspections are usually addressed promptly, according to client specifications.

7.2.2 Analytical Services Quality Control Synopsis

7.2.2.1 Results Summary

7.2.2.1.1 Environmental Services Quality Control

During this annual reporting period, twenty-eight nuclides associated with six media types were analyzed by means of the laboratory's internal process control, Analytics, ERA and DOE quality control programs. Media types representative of client company analyses performed during this reporting period were selected. The results for these programs are presented in Tables 7.2. Below is a synopsis of the media types evaluated:

- Air Filter
- Charcoal (Air Iodine)
- Milk
- Soil
- Vegetation
- Water

7.2.2.1.2 Analytics Environmental Cross-Check Program

Twelve nuclides were evaluated during this reporting period. All environmental analyses performed were within the acceptable criteria.

7.2.2.1.3 Summary of Participation in the Department of Energy (DOE) Monitoring Program

TBE-ES participated in the semi annual Mixed Analyte Performance Evaluation Program (MAPEP) for liquid, air particulate, soil, and vegetation analyses (MAPEP-Series 17). During this reporting period, 18 nuclides were evaluated. All but five of the 18 environmental analyses performed were within the acceptable criteria. In one soil sample, Pu-239/240 failed due to insufficient recovery of sample after muffling. Aliquot was cut from 2 grams to 1 gram with acceptable results. No client samples were analyzed for Pu-239/240 during this period.

One MAPEP soil sample, Tc-99 failed. A rerun using a more robust preparation resulted in acceptable results. No client samples were analyzed for Tc-99 during this period.

Vegetation samples for Am-241, Pu-238 and Pu-239/240 failed MAPEP criteria. The samples were for research purposes only. No client vegetation samples are analyzed for these radionuclides.

7.2.2.1.5 Summary of participation in the ERA Program

During this reporting period, 12 nuclides were analyzed under ERA criteria. All but two of the environmental analytical results were acceptable.

The Sr-89 and Natural Uranium in water failed on the high side for special request Quik Response samples ordered in addition to the two sets normally analyzed. No cause for the failures could be found. The RAD 71 and RAD 72 SR-89 and Natural Uranium results bracketing the failures had acceptable results.

7.2.2.2 Intra-Laboratory Process Control Program

The TBE-ES Laboratory's internal process control program evaluated 3908 individual samples.

7.2.2.2.1 Spikes

All but one of the 1245 environmental spikes were analyzed with statistically appropriate activity reported for each spike. The one affected work order was reanalyzed.

7.2.2.2.2 Analytical Blanks

During this reporting period, all but 18 of the 1246 environmental analytical blanks analyzed reported less than MDC. The activity detected for the 18 blanks is indistinguishable from natural background.

7.2.2.2.3 Duplicates

All of 1417 duplicate sets analyzed were within acceptable limits.

7.2.2.2.4 Non-Conformance Reports

There were 16 non-conformance reports issued for this reporting period. No ENNVY data was impacted by the non-conformance in each of these cases.

7.3 J. A. Fitzpatrick Environmental Laboratory QA/QC Program Description

The Offsite Dose Calculation Manual (ODCM), Part 1, Section 5.3 requires that the licensee participate in an Interlaboratory Comparison Program. The Interlaboratory Comparison Program shall include sample media for which samples are routinely collected and for which comparison samples are commercially available. Participation in an Interlaboratory Comparison Program ensures that independent checks on the precision and accuracy of the measurement of radioactive material in the environmental samples are performed as part of the Quality Assurance Program for environmental monitoring. To fulfill the requirement for an Interlaboratory Comparison Program, the JAF Environmental Laboratory has engaged the services of Eckert & Ziegler Analytics, Incorporated in Atlanta, Georgia.

Analytics supplies sample media as blind sample spikes, which contain certified levels of radioactivity unknown to the analysis laboratory. These samples are prepared and analyzed by the JAF Environmental Laboratory using standard laboratory procedures. Analytics issues a statistical summary report of the results. The JAF Environmental Laboratory uses predetermined acceptance criteria methodology for evaluating the laboratory's performance.

The JAF Environmental Laboratory also analyzes laboratory blanks. The analysis of laboratory blanks provides a means to detect and measure radioactive contamination of analytical samples. The analysis of analytical blanks also provides information on the adequacy of background subtraction. Laboratory blank results are analyzed using control charts.

It is important to note that the JAF Environmental Laboratory has participated in the NEI/NIST MAP for several years. There were 2 NIST samples included as part of the blind samples received each year. The JAF Environmental Laboratory was not able to participate in the program for 2008. This program is no longer sponsored by NEI. The NIST program has been cut back and did not meet our QC needs for 2008. We are still working with NIST to stay involved in the NIST MAP for 2009, if it can meet our QC needs.

7.3.1 PROGRAM SCHEDULE

SAMPLE MEDIA	LABORATORY ANALYSIS	SAMPLE PROVIDER ANALYTICS
Water	Gross Beta	3
Water	Tritium	5
Water	I-131	4
Water	Mixed Gamma	4
Air	Gross Beta	3
Air	I-131	4
Air	Mixed Gamma	2
Milk	I-131	3
Milk	Mixed Gamma	3
Soil	Mixed Gamma	1
Vegetation	Mixed Gamma	2
TOTAL SAMPLE INVENTORY		34

7.3.2 ACCEPTANCE CRITERIA

Each sample result is evaluated to determine the accuracy and precision of the laboratory's analysis result. The sample evaluation method is discussed below.

7.3.2.1 SAMPLE RESULTS EVALUATION

Samples provided by Analytics are evaluated using what is specified as the NRC method. This method is based on the calculation of the ratio of results reported by the participating laboratory (QC result) to the Vendor Laboratory Known value (reference result).

An Environmental Laboratory analytical result is evaluated using the following calculation:

The value for the error resolution is calculated.

$$\text{The error resolution} = \frac{\text{Reference Result}}{\text{Reference Results Error (1 sigma)}}$$

Using the appropriate row under the Error Resolution column in Table 7.3.1 below, a corresponding Ratio of Agreement interval is given.

The value for the ratio is then calculated.

$$\text{Ratio of Agreement} = \frac{\text{QC Result}}{\text{Reference Result}}$$

If the value falls within the agreement interval, the result is acceptable.

TABLE 7.3.1

ERROR RESOLUTION	RATIO OF AGREEMENT
< 4	No Comparison
4 to 7	0.5 to 2.0
8 to 15	0.6 to 1.66
16 to 50	0.75 to 1.33
51 to 200	0.8 to 1.25
>200	0.85 to 1.18

This acceptance test is generally referred to as the “NRC” method. The acceptance criteria is contained in Procedure EN-CY-102. The NRC method generally results in an acceptance range of approximately ± 25% of the Known value when applied to sample results from the Eckert & Ziegler Analytics Interlaboratory Comparison Program. This method is used as the procedurally required assessment method and requires the generation of a deviation from QA/QC program report when results are unacceptable.

7.3.3 PROGRAM RESULTS SUMMARY

The Interlaboratory Comparison Program numerical results are provided on Table 7-1.

7.3.3.1 ECKERT & ZIEGLER ANALYTICS QA SAMPLES RESULTS

Thirty-four QA blind spike samples were analyzed as part of Analytics 2008 Interlaboratory Comparison Program. The following sample media were evaluated as part of the comparison program.

- Air Charcoal Cartridge: I-131
- Air Particulate Filter: Mixed Gamma Emitters, Gross Beta
- Water: I-131, Mixed Gamma Emitters, Tritium, Gross Beta
- Soil: Mixed Gamma Emitters
- Milk: I-131, Mixed Gamma Emitters
- Vegetation: Mixed Gamma Emitters

The JAF Environmental Laboratory performed 130 individual analyses on the 34 QA samples. Of the 130 analyses performed, 130 were in agreement using the NRC acceptance criteria for a 100% agreement ratio.

There were no non-conformities in the 2008 program.

7.3.3.2 NUMERICAL RESULTS TABLES

**TABLE 7-1
INTERLABORATORY INTERCOMPARISON PROGRAM
Gross Beta Analysis of Air Particulate Filter**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
06/19/2008	E5914-05	Filter	GROSS BETA	57.0 ± 1.9 57.8 ± 1.9 52.9 ± 1.9 Mean = 55.9 ± 1.1	52.2 ± 0.871	1.07 A
06/19/2008	E5940-09	Filter	GROSS BETA	51.7 ± 0.8 51.4 ± 0.8 51.0 ± 0.8 Mean = 51.4 ± 0.5	49.2 ± 0.822	1.04 A
12/11/2008	E6368-05	Filter	GROSS BETA	123.6 ± 1.9 125.5 ± 1.9 119.9 ± 1.9 Mean = 123.0 ± 1.1	113 ± 1.89	1.09 A

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

**TABLE 7-1
INTERLABORATORY INTERCOMPARISON PROGRAM
Gross Beta Analysis of Air Particulate Filter**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi ±1 sigma	REF. LAB* pCi ±1 sigma	RATIO (1)
06/19/2008	E5914-05	Filter	Gross Beta	57.0 ± 1.9 57.8 ± 1.9 52.9 ± 1.9 Mean = 55.9 ± 1.1	52.2 ± 0.871	1.07 A
06/19/2008	E5940-09	Filter	Gross Beta	51.7 ± 0.8 51.4 ± 0.8 51.0 ± 0.8 Mean = 51.4 ± 0.5	49.2 ± 0.822	1.04 A
12/11/2008	E6368-05	Filter	Gross Beta	123.6 ± 1.9 125.5 ± 1.9 119.9 ± 1.9 Mean = 123 ± 1.1	113 ± 1.89	1.09 A

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
Tritium Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
3/20/2008	E5822-05	Water	H-3	4265 ± 170 4244 ± 170 4201 ± 169 Mean = 4237 ± 98	4010 ± 67	1.06 A
6/19/2008	E5913-05	Water	H-3	860 ± 136 994 ± 137 832 ± 136 Mean = 895 ± 79	843 ± 14.1	1.06 A
9/18/2008	E6248-05	Water	H-3	1017 ± 134 978 ± 134 937 ± 134 Mean = 977 ± 77	996 ± 16.6	0.98 A
12/11/2008	E6359-09	Water	H-3	10501 ± 207 10401 ± 207 10441 ± 207 Mean = 10448 ± 120	1.02E+04 ± 1.70E+02	1.02 A
12/11/2008	E6360-09	Water	H-3	10483 ± 207 10564 ± 208 10355 ± 206 Mean = 10467 ± 120	1.02E+04 ± 1.70E+02	1.03 A

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
Tritium Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
3/20/2008	E5822-05	Water	H-3	4265 ± 170 4244 ± 170 4201 ± 169 Mean = 4237 ± 98	4010 ± 67	1.06 A
6/19/2008	E5913-05	Water	H-3	860 ± 136 994 ± 137 832 ± 136 Mean = 895 ± 79	843 ± 14.1	1.06 A
9/18/2008	E6248-05	Water	H-3	1017 ± 134 978 ± 134 937 ± 134 Mean = 977 ± 77	996 ± 16.6	0.98 A
12/11/2008	E6359-09	Water	H-3	10501 ± 207 10401 ± 207 10441 ± 207 Mean = 10448 ± 120	1.02E+04 ± 1.70E+02	1.02 A
12/11/2008	E6360-09	Water	H-3	10483 ± 207 10564 ± 208 10355 ± 206 Mean = 10467 ± 120	1.02E+04 ± 1.70E+02	1.03 A

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
Gross Beta Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
03/20/2008	E5822-05	Water	Gross Beta	2.26E+02 ± 2.30E+00 2.29E+02 ± 2.30E+00 2.23E+02 ± 2.30E+00 Mean = 2.26E+02 ± 1.33E+00	2.30E+02 ± 3.84E+00	0.98 A
06/19/2008	E5919-05	Water	Gross Beta	1.38E+02 ± 1.80E+00 1.40E+02 ± 1.80E+00 1.37E+02 ± 1.70E+00 Mean = 1.38E+02 ± 1.02E+00	1.49E+02 ± 2.49E+00	0.93 A
09/18/2008	E6253-05	Water	Gross Beta	2.76E+02 ± 2.60E+00 2.76E+02 ± 2.60E+00 2.75E+02 ± 2.60E+00 Mean = 2.76E+02 ± 1.50E+00	2.90E+02 ± 4.85E+00	0.95 A

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
I-131 Gamma Analysis of Air Charcoal

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi ±1 sigma	REF. LAB* pCi ±1 sigma	RATIO (1)
3/20/2008	E5845-09	Air	I-131	65.8 ± 2.95 63.7 ± 2.88 61.7 ± 3.13 Mean = 63.7 ± 1.73	60.0 ± 1.0	1.06 A
6/19/2008	E5917-05	Air	I-131	79.8 ± 4.1 81.4 ± 3.02 85.8 ± 3.51 Mean = 82.3 ± 2.06	84.8 ± 1.42	0.97 A
9/18/2008	E6301-09	Air	I-131	87.4 ± 2.6 85.3 ± 2.62 92.5 ± 2.86 Mean = 88.4 ± 1.56	87.7 ± 1.46	1.01 A
9/18/2008	E6252-05	Air	I-131	83.6 ± 3.29 90.1 ± 2.57 83.1 ± 2.69 Mean = 85.6 ± 1.66	82.0 ± 1.37	1.04 A

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
3/20/2008	E5820-05	Water	Ce-141	208 ± 5.87	198 ± 3.31	1.04 A
				200 ± 8.89		
			Cr-51	210 ± 8.46	286 ± 4.77	1.11 A
				Mean = 206 ± 4.5		
			Cs-134	320 ± 27.1	99.7 ± 1.67	1.08 A
				280 ± 34.8		
			Cs-137	349 ± 33.4	116 ± 1.94	1.07 A
				Mean = 316 ± 18.4		
			Co-58	105 ± 3.89	56.4 ± 0.941	1.03 A
				109 ± 6		
			Mn-54	109 ± 5.42	75 ± 1.25	1.10 A
Mean = 108 ± 3.0						
Fe-59	120 ± 4.23	81.4 ± 1.36	1.07 A			
	137 ± 6.1					
Zn-65	116 ± 5.64	109 ± 1.82	1.05 A			
	Mean = 124 ± 3.1					
Co-60	55.7 ± 3.55	188 ± 3.14	1.02 A			
	66.1 ± 4.81					
I-131**	51.8 ± 4.76	70.4 ± 1.18	1.04 A			
	Mean = 57.9 ± 2.5					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
6/19/2008	E5939-09	Water	Ce-141	252 ± 3.35	237 ± 3.96	1.04 A
				235 ± 7.01		
			Mean =	252 ± 2.93	188 ± 3.14	1.10 A
				246 ± 2.8		
			Cr-51	213 ± 13.8	104 ± 1.74	1.08 A
				192 ± 23.4		
			Mean =	215 ± 13.1	158 ± 2.64	1.00 A
				207 ± 10.1		
			Cs-134	112 ± 1.71	84 ± 1.41	1.06 A
				115 ± 4.29		
Mean =	109 ± 1.58	208 ± 2.22	1.10 A			
	112 ± 1.6					
Cs-137	160 ± 1.95	125 ± 2.08	1.09 A			
	154 ± 4.46					
Mean =	161 ± 1.84	192 ± 4.95	1.08 A			
	158 ± 1.7					
Co-58	90 ± 1.66	172 ± 2.88	1.08 A			
	91 ± 3.85					
Mean =	89 ± 1.59	147 ± 1.4	1.03 A			
	90 ± 1.5					
Mn-54	208 ± 2.22	47 ± 4.17	0.92 A			
	192 ± 4.95					
Mean =	207 ± 2.11	37 ± 2.24				
	202 ± 1.9					
Fe-59	139 ± 2.48	44 ± 1.04				
	136 ± 5.47					
Mean =	133 ± 2.51	40 ± 2.5				
	136 ± 2.2					
Zn-65	192 ± 3.29	42 ± 1.4				
	185 ± 7.78					
Mean =	180 ± 3.12					
	186 ± 3.0					
Co-60	147 ± 1.4	45.3 ± 0.756				
	145 ± 3.3					
Mean =	148 ± 1.35					
	147 ± 1.3					
I-131**	47 ± 4.17					
	37 ± 2.24					
Mean =	44 ± 1.04					
	40 ± 2.5					
			42 ± 1.4			

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
9/18/2008	E6249-05	Water	Ce-141	108 ± 6.03	107 ± 1.78	1.04 A
				113 ± 4.98		
				109 ± 4.9		
				115 ± 4.42		
			Mean =	111 ± 2.6		
			Cr-51	335 ± 31.3	279 ± 4.65	1.08 A
				268 ± 20.8		
				297 ± 23.3		
				307 ± 20.7		
			Mean =	302 ± 12.2		
			Cs-134	197 ± 5.89	154 ± 2.56	1.11 A
				143 ± 8.08		
168 ± 4.9						
176 ± 4.14						
Mean =	171 ± 3.0					
Cs-137	116 ± 5.11	107 ± 1.79	1.03 A			
	114 ± 3.98					
	102 ± 3.88					
	110 ± 3.46					
Mean =	111 ± 2.1					
Co-58	128 ± 5.16	118 ± 1.97	1.06 A			
	125 ± 3.98					
	119 ± 4					
	128 ± 3.77					
Mean =	125 ± 2.1					
Mn-54	122 ± 5.4	110 ± 1.84	1.13 A			
	118 ± 4.02					
	131 ± 4.24					
	127 ± 3.68					
Mean =	125 ± 2.2					
Fe-59	111 ± 6.1	96 ± 1.6	1.13 A			
	105 ± 4.37					
	103 ± 4.5					
	115 ± 4.11					
Mean =	109 ± 2.4					
Zn-65	218 ± 10.9	211 ± 3.53	1.05 A			
	217 ± 8.18					
	239 ± 8.68					
	216 ± 7.7					
Mean =	223 ± 4.5					
Co-60	162 ± 4.47	155 ± 2.59	1.02 A			
	149 ± 3.39					
	158 ± 3.52					
	163 ± 3.08					
Mean =	158 ± 1.8					
I-131**	109 ± 2.21	105 ± 1.75	1.00 A			
	102 ± 2.06					
	105 ± 2.03					
	Mean =			105 ± 1.2		

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ± 1 sigma	REF. LAB* pCi/liter ± 1 sigma	RATIO (1)
12/11/2008	E6361-09	Water	Ce-141	240 \pm 4.38	224 \pm 3.74	1.06 A
				229 \pm 5.95		
				244 \pm 4.4		
				Mean = 238 \pm 2.9		
			Cr-51	324 \pm 20.5	288 \pm 4.81	0.99 A
				274 \pm 26.6		
				254 \pm 22.8		
				Mean = 284 \pm 13.5		
			Cs-134	169 \pm 2.4	157 \pm 2.62	1.05 A
				162 \pm 3.46		
165 \pm 2.76						
Mean = 165 \pm 1.7						
Cs-137	139 \pm 2.2	140 \pm 2.34	0.99 A			
	136 \pm 2.95					
	140 \pm 2.63					
	Mean = 138 \pm 1.5					
Co-58	123 \pm 2.29	122.0 \pm 2.03	1.02 A			
	126 \pm 3.24					
	125 \pm 2.71					
	Mean = 124.7 \pm 1.6					
Mn-54	189 \pm 2.59	178 \pm 2.97	1.04 A			
	183 \pm 3.43					
	183 \pm 3.01					
	Mean = 185 \pm 1.7					
Fe-59	136 \pm 3.26	117.0 \pm 1.96	1.09 A			
	122 \pm 4.29					
	126 \pm 3.97					
	Mean = 128 \pm 2.2					
Zn-65	222 \pm 4.54	214 \pm 3.57	1.06 A			
	228 \pm 6.06					
	230 \pm 5.21					
	Mean = 227 \pm 3.1					
Co-60	163 \pm 1.79	156 \pm 2.6	1.04 A			
	162 \pm 2.36					
	160 \pm 2.16					
	Mean = 162 \pm 1.2					
I-131**	74.8 \pm 7.12	64.1 \pm 1.07	1.03 A			
	58.3 \pm 4.07					
	64.1 \pm 7.2					
	Mean = 65.7 \pm 3.6					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Milk

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
3/20/2008	E5846-09	Milk	Ce-141	240 ± 13.8	249 ± 4.2	0.97 A
				245 ± 11.9		
			Cr-51	236 ± 6.8	359 ± 6.0	1.04 A
				Mean = 240 ± 6.5		
			Cs-134	371 ± 65.6	125 ± 2.1	0.96 A
				384 ± 50.4		
			Cs-137	370 ± 30.2	146 ± 2.4	0.97 A
				Mean = 375 ± 29.4		
			Co-58	115 ± 11.4	71.0 ± 1.2	0.96 A
				121 ± 8.0		
			Mn-54	124 ± 6.0	94 ± 1.6	1.08 A
Mean = 120 ± 5.1						
Fe-59	147 ± 10.9	102 ± 1.7	1.12 A			
	143 ± 8.9					
Zn-65	135 ± 5.1	137 ± 2.3	0.99 A			
	Mean = 142 ± 5.0					
Co-60	70.2 ± 10.1	236 ± 4.0	0.98 A			
	64.2 ± 7.2					
I-131**	70.4 ± 4.6	60.0 ± 1.0	1.01 A			
	Mean = 68.3 ± 4.4					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Milk

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REF. LAB* pCi/liter ±1 sigma	RATIO (1)
6/19/2008	E5915-05	Milk	Ce-141	173 ± 6.4	174 ± 2.91	1.01 A
				177 ± 7.9		
				177 ± 6.8		
				Mean = 176 ± 4.1		
			Cr-51	185 ± 24.7	138 ± 2.31	1.21 A
				163 ± 30.8		
				152 ± 30.7		
				Mean = 167 ± 16.7		
			Cs-134	81 ± 3.6	77 ± 1.28	1.07 A
				80 ± 5.3		
				85 ± 4.4		
				Mean = 82 ± 2.6		
Cs-137	113 ± 4.1	116 ± 1.94	1.00 A			
	114 ± 5.5					
	122 ± 5.0					
	Mean = 116 ± 2.8					
Co-58	59.6 ± 3.6	61.9 ± 1.03	0.99 A			
	54.9 ± 4.3					
	70.1 ± 4.4					
	Mean = 61.5 ± 2.4					
Mn-54	145 ± 4.5	135 ± 2.26	1.09 A			
	146 ± 6.1					
	149 ± 5.5					
	Mean = 147 ± 3.1					
Fe-59	94 ± 4.9	92 ± 1.53	1.05 A			
	99 ± 6.9					
	97 ± 5.7					
	Mean = 97 ± 3.4					
Zn-65	120 ± 7.5	127 ± 2.12	0.98 A			
	132 ± 10.1					
	123 ± 9.3					
	Mean = 125 ± 5.2					
Co-60	111 ± 3.2	104 ± 1.74	1.04 A			
	104 ± 4.1					
	108 ± 3.8					
	Mean = 108 ± 2.1					
I-131**	58.9 ± 2.7	71 ± 1.19	0.88 A			
	66.6 ± 2.9					
	62.1 ± 3.0					
	Mean = 62.5 ± 1.7					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Milk

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter \pm 1 sigma	REF. LAB* pCi/liter \pm 1 sigma	RATIO (1)
9/18/2008	E6251-05	Milk	Ce-141	168 \pm 7.29	161 \pm 2.69	1.05 A
				172 \pm 7.69		
			Mean =	168 \pm 6.76	421 \pm 7.03	1.03 A
				169 \pm 4.19		
			Cr-51	411 \pm 34.9	232 \pm 3.87	1.03 A
				429 \pm 37.2		
			Mean =	456 \pm 32.0	162 \pm 2.71	1.02 A
				432 \pm 20.1		
			Cs-134	241 \pm 7.47	179 \pm 2.98	1.01 A
				241 \pm 7.81		
Mean =	236 \pm 6.49	166 \pm 2.77	1.14 A			
	239 \pm 4.20					
Cs-137	167 \pm 5.86	144 \pm 2.41	1.04 A			
	173 \pm 6.86					
Mean =	155 \pm 5.23	319 \pm 5.33	1.01 A			
	165 \pm 3.48					
Co-58	188 \pm 6.03	234 \pm 3.91	1.02 A			
	177 \pm 6.60					
Mean =	177 \pm 5.34	61.3 \pm 2.17	0.89 A			
	181 \pm 3.47					
Mn-54	193 \pm 6.24	61.6 \pm 1.73				
	189 \pm 7.16					
Mean =	184 \pm 5.65	59.3 \pm 1.75				
	189 \pm 3.68					
Fe-59	150 \pm 6.92	Mean =	60.7 \pm 1.09			
	143 \pm 7.97					
Mean =	158 \pm 3.63					
	150 \pm 3.72					
Zn-65	326 \pm 13.3					
	302 \pm 15.1					
Mean =	342 \pm 11.9					
	323 \pm 7.79					
Co-60	242 \pm 5.31					
	242 \pm 6.25					
Mean =	231 \pm 4.75					
	238 \pm 3.16					
I-131**	61.3 \pm 2.17					
	61.6 \pm 1.73					
Mean =	59.3 \pm 1.75					
	60.7 \pm 1.09					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Air Particulate Filter

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi ±1 sigma	REF. LAB* pCi ±1 sigma	RATIO (1)
3/20/2008	E5821-05	Filter	Ce-141	204 ± 2.42	179 ± 2.99	1.09 A
				192 ± 4.23		
				189 ± 4.24		
				Mean = 195 ± 2.15		
			Cr-51	305 ± 10.7	259 ± 4.32	1.15 A
				300 ± 18.0		
				289 ± 20.9		
				Mean = 298 ± 9.86		
			Cs-134	102 ± 2.64	90.2 ± 1.51	1.18 A
107 ± 4.06						
110 ± 4.50						
Mean = 106.3 ± 2.20						
Cs-137	115 ± 2.40	105 ± 1.75	1.11 A			
	116 ± 3.81					
	120 ± 4.42					
	Mean = 117 ± 2.10					
Co-58	57 ± 2.00	51.0 ± 0.852	1.10 A			
	56.4 ± 3.06					
	55.5 ± 3.48					
	Mean = 56.3 ± 1.68					
Mn-54	80.6 ± 2.18	67.8 ± 1.13	1.23 A			
	85.3 ± 3.48					
	85.1 ± 4.19					
	Mean = 84 ± 1.96					
Fe-59	94.7 ± 3.03	73.7 ± 1.23	1.22 A			
	86.3 ± 4.94					
	88.9 ± 5.80					
	Mean = 90.0 ± 2.73					
Zn-65	116 ± 4.59	98.6 ± 1.65	1.19 A			
	124 ± 7.13					
	111 ± 8.56					
	Mean = 117 ± 4.02					
Co-60	182 ± 2.55	170 ± 2.84	1.06 A			
	181 ± 3.91					
	176 ± 4.65					
	Mean = 180 ± 2.20					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Air Particulate Filter

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi ±1 sigma	REF. LAB* pCi ±1 sigma	RATIO (1)
9/18/2008	E6250-05	Filter	Ce-141	170 ± 4.28	159 ± 2.65	1.07 A
				170 ± 3.6		
				172 ± 3.95		
				Mean = 171 ± 2.3		
			Cr-51	431 ± 25.1	415 ± 6.92	1.11 A
				452 ± 21.2		
				497 ± 21.6		
				Mean = 460 ± 13.1		
			Cs-134	267 ± 7.48	229 ± 3.82	1.16 A
				257 ± 6.33		
270 ± 6.1						
Mean = 265 ± 3.8						
Cs-137	163 ± 5.88	160 ± 2.67	1.02 A			
	163 ± 4.96					
	162 ± 4.71					
	Mean = 163 ± 3.0					
Co-58	179 ± 6.18	176 ± 2.93	1.08 A			
	200 ± 5.36					
	191 ± 4.91					
	Mean = 190 ± 3.2					
Mn-54	185 ± 6.69	164 ± 2.73	1.18 A			
	196 ± 5.68					
	199 ± 5.21					
	Mean = 193 ± 3.4					
Fe-59	169 ± 7.73	142 ± 2.37	1.16 A			
	164 ± 6.55					
	160 ± 5.79					
	Mean = 164 ± 3.9					
Zn-65	345 ± 14	314 ± 5.25	1.15 A			
	371 ± 12.6					
	366 ± 10.8					
	Mean = 361 ± 7.2					
Co-60	228 ± 5.87	231 ± 3.85	1.01 A			
	238 ± 4.89					
	231 ± 4.45					
	Mean = 232 ± 2.9					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Soil

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/g ±1 sigma	REF. LAB* pCi/g ±1 sigma	RATIO (1)
6/19/2008	E5916-05	Soil	Ce-141	0.359 ± 0.015	0.380 ± 0.006	0.98 A
				0.364 ± 0.014		
				0.381 ± 0.008		
				0.386 ± 0.013		
			Mean = 0.373 ± 0.006			
			Cr-51	0.345 ± 0.089	0.302 ± 0.005	1.03 A
				0.276 ± 0.056		
				0.346 ± 0.035		
				0.277 ± 0.059		
			Mean = 0.311 ± 0.031			
Cs-134	0.173 ± 0.011	0.167 ± 0.003	1.03 A			
	0.167 ± 0.010					
	0.164 ± 0.005					
	0.182 ± 0.006					
Mean = 0.172 ± 0.004						
Cs-137	0.317 ± 0.012	0.340 ± 0.006	0.96 A			
	0.324 ± 0.012					
	0.334 ± 0.006					
	0.333 ± 0.007					
Mean = 0.327 ± 0.005						
Co-58	0.117 ± 0.011	0.135 ± 0.002	0.89 A			
	0.122 ± 0.009					
	0.118 ± 0.005					
	0.123 ± 0.006					
Mean = 0.120 ± 0.004						
Mn-54	0.289 ± 0.013	0.295 ± 0.005	1.02 A			
	0.301 ± 0.012					
	0.314 ± 0.006					
	0.294 ± 0.007					
Mean = 0.300 ± 0.005						
Fe-59	0.173 ± 0.015	0.200 ± 0.003	0.93 A			
	0.194 ± 0.014					
	0.185 ± 0.007					
	0.190 ± 0.010					
Mean = 0.186 ± 0.006						
Zn-65	0.257 ± 0.020	0.277 ± 0.005	0.98 A			
	0.289 ± 0.018					
	0.281 ± 0.009					
	0.256 ± 0.011					
Mean = 0.271 ± 0.008						
Co-60	0.220 ± 0.009	0.228 ± 0.004	0.93 A			
	0.206 ± 0.008					
	0.214 ± 0.004					
	0.208 ± 0.005					
Mean = 0.212 ± 0.003						

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Vegetation

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/g ±1 sigma	REF. LAB* pCi/g ±1 sigma	RATIO (1)
6/19/2008	E5918-05	Vegetation	Ce-141	0.381 ± 0.019	0.390 ± 0.007	0.95 A
				0.371 ± 0.015		
				0.358 ± 0.013		
				Mean = 0.370 ± 0.009		
			Cr-51	0.311 ± 0.081	0.309 ± 0.005	1.14 A
				0.371 ± 0.065		
				0.378 ± 0.054		
				Mean = 0.353 ± 0.039		
			Cs-134	0.171 ± 0.016	0.172 ± 0.003	1.03 A
0.176 ± 0.013						
0.184 ± 0.010						
Mean = 0.177 ± 0.008						
Cs-137	0.272 ± 0.015	0.260 ± 0.004	0.98 A			
	0.257 ± 0.013					
	0.235 ± 0.011					
	Mean = 0.255 ± 0.008					
Co-58	0.152 ± 0.013	0.138 ± 0.002	1.03 A			
	0.142 ± 0.011					
	0.131 ± 0.009					
	Mean = 0.142 ± 0.006					
Mn-54	0.293 ± 0.016	0.302 ± 0.005	1.02 A			
	0.325 ± 0.015					
	0.306 ± 0.012					
	Mean = 0.308 ± 0.008					
Fe-59	0.207 ± 0.018	0.205 ± 0.003	1.04 A			
	0.215 ± 0.017					
	0.219 ± 0.014					
	Mean = 0.214 ± 0.009					
Zn-65	0.306 ± 0.027	0.284 ± 0.005	0.97 A			
	0.240 ± 0.022					
	0.282 ± 0.019					
	Mean = 0.276 ± 0.013					
Co-60	0.216 ± 0.011	0.233 ± 0.004	0.95 A			
	0.235 ± 0.011					
	0.212 ± 0.008					
	Mean = 0.221 ± 0.006					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

TABLE 7-1 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Vegetation

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/g ±1 sigma	REF. LAB* pCi/g ±1 sigma	RATIO (1)
9/18/2008	E6302-09	Vegetation	Ce-141	0.447 ± 0.023	0.474 ± 0.008	0.96 A
				0.447 ± 0.017		
				0.473 ± 0.018		
				Mean = 0.456 ± 0.011		
			Cr-51	1.200 ± 0.129	1.240 ± 0.021	0.95 A
				1.160 ± 0.086		
				1.170 ± 0.098		
				Mean = 1.177 ± 0.061		
			Cs-134	0.760 ± 0.031	0.683 ± 0.011	1.08 A
0.738 ± 0.024						
0.708 ± 0.026						
Mean = 0.735 ± 0.016						
Cs-137	0.407 ± 0.024	0.477 ± 0.008	0.87 A			
	0.422 ± 0.017					
	0.417 ± 0.020					
	Mean = 0.415 ± 0.012					
Co-58	0.552 ± 0.027	0.525 ± 0.009	0.98 A			
	0.500 ± 0.019					
	0.492 ± 0.020					
	Mean = 0.515 ± 0.013					
Mn-54	0.467 ± 0.027	0.489 ± 0.008	1.01 A			
	0.503 ± 0.019					
	0.518 ± 0.022					
	Mean = 0.496 ± 0.013					
Fe-59	0.382 ± 0.030	0.425 ± 0.007	0.97 A			
	0.432 ± 0.021					
	0.428 ± 0.025					
	Mean = 0.414 ± 0.015					
Zn-65	0.808 ± 0.056	0.939 ± 0.016	0.94 A			
	0.917 ± 0.040					
	0.930 ± 0.046					
	Mean = 0.885 ± 0.027					
Co-60	0.673 ± 0.024	0.690 ± 0.012	0.95 A			
	0.659 ± 0.016					
	0.632 ± 0.018					
	Mean = 0.655 ± 0.008					

(1) Ratio = Reported/Analytics.

* Sample provided by Eckert & Ziegler Analytics

A=Acceptable

U=Unacceptable

7.3.4 REFERENCES

- 7.3.4.1 Radioactivity and Radiochemistry, The Counting Room: Special Edition, 1994 Caretaker Publications, Atlanta, Georgia.
- 7.3.4.2 Data Reduction and Error Analysis for the Physical Sciences, Bevington P.R., McGraw Hill, New York (1969).

8. Land Use Census

The Vermont Yankee Nuclear Power Station Off-site Dose Calculation Manual 3/4.5.2 requires that a Land Use Census be conducted annually between the dates of June 1 and October 1. The census identifies the locations of the nearest milk animal and the nearest residence in each of the 16 meteorological sectors within a distance of five miles of the plant. The census also identifies the nearest milk animal (within three miles of the plant) to the point of predicted highest annual average D/Q (deposition factor for dry deposition of elemental radionuclides and other particulates) value due to elevated releases from the plant stack in each of the three major meteorological sectors. The 2008 Land Use Census was conducted in the summer of 2008 in accordance with the ODCM.

Following the collection of field data and in compliance with Off-site Dose Calculation Manual (ODCM) Section 10.1, a dosimetric analysis is performed to compare the census locations to the "critical receptor" identified in the ODCM. This critical receptor is the location that is used in the Method 1 screening dose calculations found in the ODCM (i.e. the dose calculations done in compliance with ODCM Surveillance 4.3.3). If a census location has a 20% greater potential dose than that of the critical receptor, this fact must be announced in the annual Radioactive Effluent Release Report for that period. A re-evaluation of the critical receptor would also be done at that time. An evaluation of the 2008 Land Use Census data was performed and it was determined there were no changes required for monitoring locations at this time.

Pursuant to ODCM 3.5.2.a, a dosimetric analysis was performed, using site specific meteorological data, to determine which milk animal locations would provide the optimal sampling locations. If any location had experienced a 20% greater potential dose commitment than at a currently sampled location, the new location would be added to the routine environmental sampling program in replacement of the location with the lowest calculated dose (which is eliminated from the program). The 2008 Land Use Census did not identify any locations, meeting the criteria of ODCM Table 3.5.1, with a greater potential dose commitment than at currently sampled locations. No changes to the Radiological Environmental Monitoring Program (REMP) were required based on the Land Use Census.

The results of the 2008 Land Use Census are included in this report in compliance with ODCM 4.5.2 and ODCM 10.2. The locations identified during the census may be found in Table 8.1.

TABLE 8.1
2008 LAND USE CENSUS LOCATIONS*

SECTOR	NEAREST RESIDENCE Km (Mi)	NEAREST MILK ANIMAL Km (Mi)
N	1.4 (0.9)	----
NNE	1.4 (0.9)	5.5 (3.4) Cows
NE	1.3 (0.8)	----
ENE	1.0 (0.6)	----
E	0.9 (0.6)	----
ESE	1.9 (1.1)	----
SE	2.0 (1.2)	3.6 (2.2) Cows**
SSE	2.1 (1.3)	----
S	0.6 (0.4)	2.2 (1.4) Cows**
SSW	0.5 (0.3)	----
SW	0.4 (0.3)	8.2 (5.1) Cows
WSW	0.5 (0.3)	----
W	0.6 (0.4)	0.8 (0.5) Cows
WNW	1.1 (0.7)	----
NW	2.3 (1.4)	----
NNW	1.7 (1.0)	----

* Sectors and distances are relative to the plant stack as determined by a Global Positioning System survey conducted in 1997.

** Location of nearest milk animal within 3 miles of the plant to the point of predicted highest annual average D/Q value in each of the three major meteorological sectors.

9. SUMMARY

During 2008 as in all previous years of plant operation, a program was conducted to assess the levels of radiation or radioactivity in the Vermont Yankee Nuclear Power Station environment. Over 1000 samples were collected (including TLDs) over the course of the year, with a total of over 2700 radionuclide or exposure rate analyses performed. The samples included ground water, river water, sediment, fish, milk, silage, mixed grass, storm drain sediment, and storm drain water. In addition to these samples, the air surrounding the plant was sampled continuously and the radiation levels were measured continuously with environmental TLDs.

Three of the objectives of the Radiological Environmental Monitoring Program (REMP) are:

- To provide an early indication of the appearance or accumulation of any radioactive material in the environment caused by the operation of the station.
- To provide assurance to regulatory agencies and the public that the station's environmental impact is known and within anticipated limits.
- To verify the adequacy and proper functioning of station effluent controls and monitoring systems.

Low levels of radioactivity from three sources (discussed below) were detected in samples collected off-site as a part of the radiological environmental monitoring program. Most samples had measurable levels of naturally-occurring K-40, Be-7, Th-232 or radon daughter products. These are the most common of the naturally-occurring radionuclides.

Samples of milk and sediment contained fallout radioactivity such as Cs-137 and Sr-90 from atmospheric nuclear weapons tests conducted primarily from the late 1950s through 1980.

Several sediment samples from onsite locations (from the plant storm drain system) had low levels of radioactivity resulting from emissions from the Vermont Yankee plant. In all cases, the possible radiological impact was negligible with respect to exposure from natural background radiation. In no case did the detected levels exceed the most restrictive federal regulatory or plant license limits for radionuclides in the environment. Measured values were several orders of magnitude below reportable levels listed in Table 4.5.

10. REFERENCES

1. USNRC Radiological Assessment Branch Technical Position, "An Acceptable Radiological Environmental Monitoring Program," Revision 1, November 1979.
2. NCRP Report No. 94, *Exposure of the Population in the United States and Canada from Natural Background Radiation*, National Council on Radiation Protection and Measurements, 1987.
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4. Kathren, Ronald L., *Radioactivity and the Environment - Sources, Distribution, and Surveillance*, Harwood Academic Publishers, New York, 1984.
5. Till, John E. and Robert H. Meyer, ed., *Radiological Assessment - A Textbook on Environmental Dose Analysis*, NUREG/CR-3332, U.S. Nuclear Regulatory Commission, Washington, D.C., 1983.
6. NUREG/CR-3130, *Influence of Leach Rate and Other Parameters on Groundwater Migration*, February 1983.