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April 28, 2010

10 CFR 50, Appendix I
Defueled TS 6.6.2

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: 2009 Radiological Environmental Operating Report

Big Rock Point Plant
Dockets 50-155 and 72-043
License No. DPR-6

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. is submitting the enclosed Radiological Environmental Operating Report for the Big Rock Point Independent Spent Fuel Storage Installation (ISFSI). This report was prepared in accordance with the requirements of 10 CFR 50, Appendix I, Section IV.B, and Defueled Technical Specification 6.6.2. The period covered by the enclosed report is January 1, 2009, through December 31, 2009.

This letter contains no new commitments and no revision to existing commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paula K. Anderson".

pka/bed

Enclosure: Big Rock Point 2009 Annual Radiological Environmental Operating Report
Attachment 1: Sample Collection Anomalies
Attachment 2: Environmental Sample Schedule and Sample Location Maps
Attachment 3: Radiological Environmental Monitoring Program Data for BRP ISFSI

CC Administrator, Region III, USNRC
NRC NMSS Project Manager

ENCLOSURE

Big Rock Point 2009 Annual Radiological Environmental Operating Report

I. Introduction

The 2009 Big Rock Point (BRP) Annual Radiological Environmental Operating Report provides a summary and data interpretation of the BRP Radiological Environmental Monitoring Program (REMP) as conducted during the 2009 reporting period. Reporting requirements are detailed in the BRP Defueled Technical Specification 6.6.2 and Offsite Dose Calculation Manual (ODCM), Section III, Subsection 2.0.

The BRP ODCM, Section III, contains the requirements for the REMP. The radiological environmental monitoring sampling requirements are greatly reduced from the plant's operating period and now only encompass Independent Spent Fuel Storage Installation (ISFSI) operations.

On January 2, 2009, the control TLDs BR-6 located at the Consumers Energy Boyne City Service Center and BR-7 located at the Consumers Energy Traverse City Service Center were relocated to new locations in Boyne City and Ironton, Michigan respectively. The relocation was necessary as access to the Consumers Energy facilities was no longer available. Effective January 1, 2009, BRP implemented the services of Global Dosimetry Solutions as provider of environmental TLDs and processing.

Tables 1, 2, and 3, of this enclosure, provide a summary of 2009 BRP REMP sample requirements and results.

II. Discussion and Interpretation of Results

A. TLDs – Gamma Dose

The BRP Gamma Dose Assessment Program consists of eleven thermoluminescent dosimeter (TLD) locations: Four at the outside perimeter of the ISFSI (locations: BR-18, BR-19, BR-20, and BR-21), four at the ISFSI protected area fence line (locations: BR-22, BR-23, BR-24, and BR-25), and three control TLDs, approximately 13 miles out (locations: BR-5 Petoskey, BR-6 Boyne City, and BR-7 Ironton). Environmental gamma doses are measured quarterly and annually by placement of two TLD badges per designated location. Detailed sample station identification and location information is provided in Attachment 2.

For 2009, the average quarterly gamma readings were:

29.7 millirem for protected area fence TLDs,
22.3 millirem for ISFSI outside perimeter TLDs, and
24.2 millirem for the control TLD locations.

For 2009, the average annual gamma readings were:

86.5 millirem for protected area fence TLDs,
56.3 millirem for ISFSI outside perimeter TLDs, and
58.3 millirem for the control TLD locations.

The comparative evaluation of the protected area fence line quarterly TLD mean and the ISFSI outside perimeter TLD mean measured in 2009 are nominally higher from that of 2008. This is attributed to a different lab reading the TLDs.

A comparative evaluation was also completed of the 2009 offsite control TLD data to the ISFSI outside perimeter TLD data. The ISFSI outside perimeter mean, although slightly below from the offsite control mean, is not statistically different than the offsite control TLD mean.

A comparative evaluation was completed of the 2008 and 2009 control data. This evaluation was completed to assess the effect of relocation of control TLDs BR-6 and BR-7. The conclusion of the evaluation was that the relocated control TLD data was representative of the previous control TLD location data.

Each TLD badge contains a 4-zone calcium sulfate (CaSO_2) phosphor wafer (the wafer also includes an additional backup/reserve read-out zone). Sensitivity for the multi-zone TLDs are 1.0 millirem with a linear response to 1000 rem.

B. Air Samples

The BRP REMP no longer requires that airborne surveillance be conducted.

C. Milk

The BRP REMP no longer requires that milk samples be collected.

D. Lake Water

The BRP REMP no longer requires that lake water samples be collected.

E. Drinking Water

The BRP REMP no longer requires that drinking water samples be collected.

F. Crops

The collection of food crops/vegetation is not required by the BRP REMP.

G. Sediment

The BRP REMP no longer requires that well water samples be collected.

H. Aquatic Biota

The collection of aquatic biota (algae and periphyton) is no longer required by the BRP REMP.

III. Assessment of BRP ISFSI Operational Environmental Impact

Review and comparison of the 2009 BRP radiological environmental monitoring data to previous data shows that the parameters analyzed support the conclusion that ISFSI operations have had minimal environmental impact.

Table 1. Sampling and Analysis Summary

<u>Medium</u>	<u>Description</u>	<u>Location(s)</u>	<u>Type of Analysis</u>	<u>Number of Samples Collected</u>	<u>Frequency of Analysis</u>
TLD	BR-5, BR-6, BR-7, BR-18-25	18-25 BRP, 5-PT, 6-BC, 7-IR	Gamma Isotopic	44 11	Quarterly Annual ^a
Lake Water	1 gallon composite	1-ST	Tritium, Gamma Isotopic	0	No Longer Required
Well Water	1 gallon grab/composite	Site Well	Tritium, Gamma Isotopic	0	No Longer Required
Monitoring Wells	1 gallon grab	MW 1-9	Tritium, Gamma Isotopic	0	No Longer Required
Sediment	Grab	1-ST, 24-STS, 25-STN, 26-LP	Gamma Isotopic	0	No Longer Required
Fish	Grab	1-ST Discharge	Gamma Isotopic	0	No Longer Required

Table Notes

^a Only quarterly TLD's are required per Big Rock Point ODCM

Table 2. Sample Data Summary ^a

Medium or Pathway Sampled (Units)	Analysis Evaluated Versus Total Number Analyses Performed	Lower Limit of Detection (LLD) ^b	All Indicator Locations	All Control Locations	Nonroutine Measurements
			Mean ^c (Range)	Mean ^c (Range)	
<u>Direct Radiation:</u>					
TLD – Protected Area Fence	TLD (quarterly) ^{d e} 16/16	1.0	29.7 (20-25)	12/12	None
	TLD (annual) ^e 4/4	1.0	86.5 (71-132)	3/3	None
TLD – ISFSI Outside Perimeter	TLD (quarterly) ^{d e} 16/16	1.0	22.3 (18-27)	12/12	None
	TLD (annual) ^e 4/4	1.0	56.3 (47-71)	3/3	None
<u>Waterborne:</u>					
Lake Water (pCi/L)	Sample not required				
Well Water (pCi/L)	Sample not required				
<u>Lake Sediment:</u>					
Sediment (pCi/g dry)	Sample not required				
<u>Biota:</u>					
Fish (pCi/g wet)	Sample not required				
Crayfish (pCi/g wet)	Sample not required				

Table Notes:

^a Values for sample locations with the greatest annual mean are provided in Table 3.

^b Nominal LLD as defined in the Big Rock Offsite Dose Calculation Manual Section 1, Table 1-3 and vendor analytical capabilities.

^c Mean and range data reported are based upon detectable measurements.

^d Quarterly TLD results are normalized for 91 days net.

^e Annual TLDs are read annually, and quarterly TLDs are read quarterly. Annual and quarterly measurements are compared to control measurements to evaluate compliance with 10 CFR 72.104. The results for the ISFSI TLDs and the average of the control TLDs measured in 2009 are summarized in the Table.

Table 3. Reporting Results Greatest Mean Sampling Location

<u>Medium</u>	<u>Type of Analysis</u>	<u>Location</u>	<u>High</u>	<u>Low</u>	<u>Mean</u>
TLD – Protected Area Fence (mR)	TLD (Quarterly) ^{a b}	BRP-23	45	40	41.5
	TLD (Annual) ^b	BRP-23	---	---	132
TLD – ISFSI Outside Perimeter (mR)	TLD (Quarterly) ^{a b}	BRP-20	27	21	24.3
	TLD (Annual) ^b	BRP-20	---	---	71
Lake Water (pCi/L)	No Longer Required				
Well Water (pCi/L)	No Longer Required ^c				
Sediment (pCi/g dry)	No Longer Required ^c				
Fish (pCi/g wet)	No Longer Required				
Crayfish (pCi/g wet)	No Longer Required				

Table Notes:

^a Quarterly TLD results are normalized for 91 days net.

^b Annual TLDs are read annually, and quarterly TLDs are read quarterly. Annual and quarterly measurements are compared to control measurements to evaluate compliance with 10 CFR 72.104. The results for the ISFSI TLDs and the average of the control TLDs measured in 2009 are summarized in the Table.

Attachment 1
Sample Collection Anomalies

LOCATION

TYPE

REASON

NONE TO REPORT

Attachment 2
Environmental Sample Schedule and Sample Location Maps

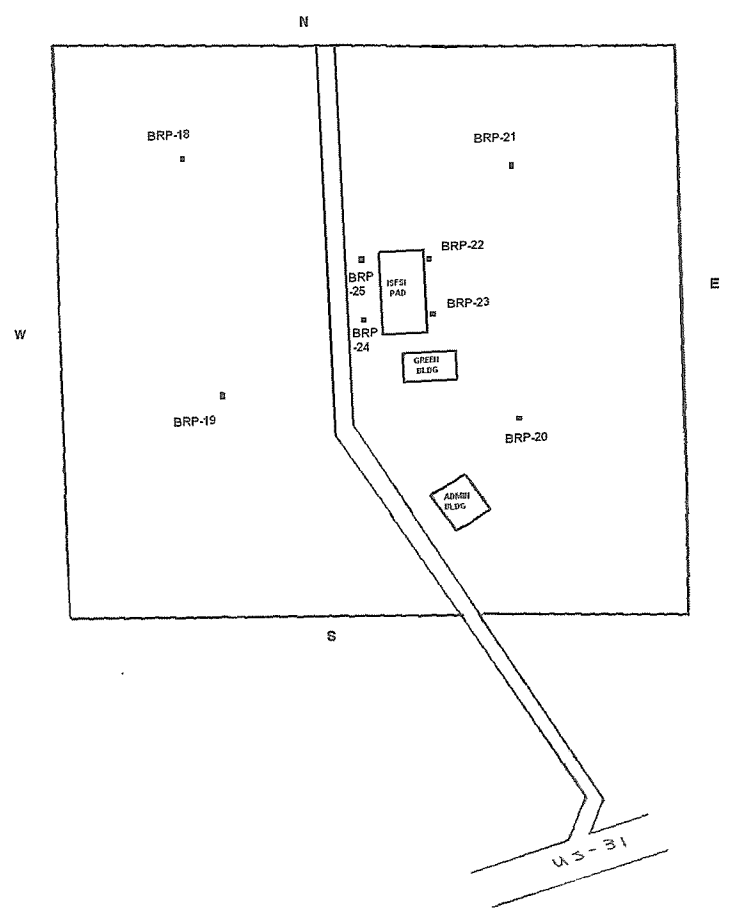
TABLE 1-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

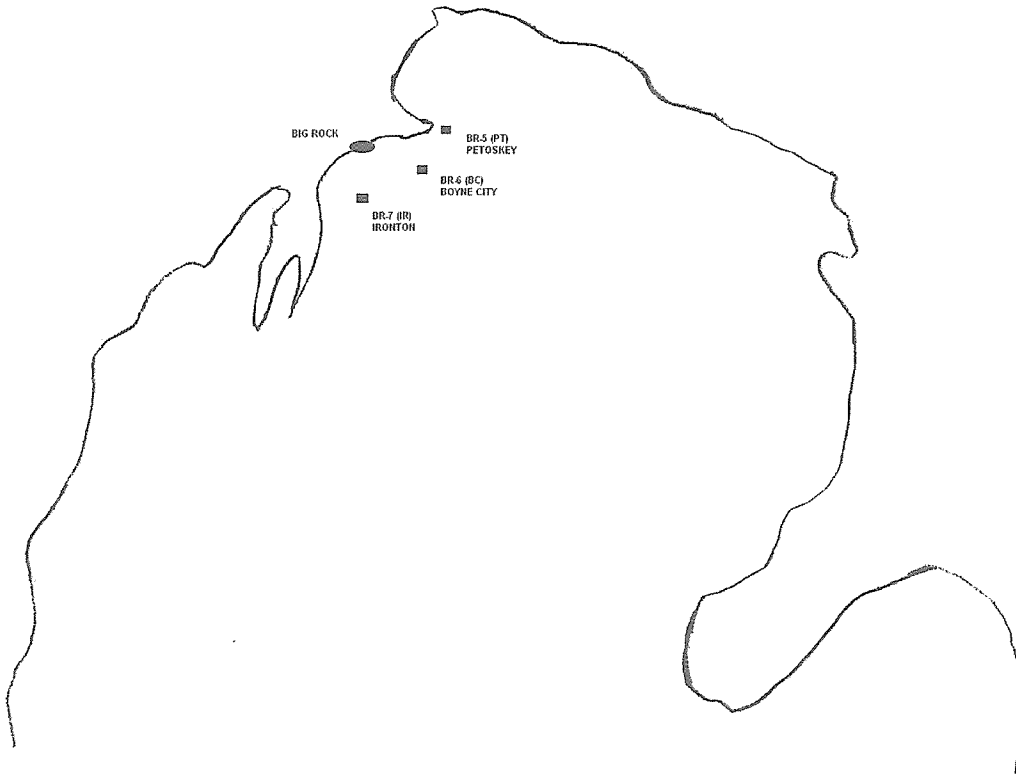
Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and frequency of Analysis
1. Direct Radiation ^b	21 monitoring stations either with two or more TLDs or one instrument for measuring and recording dose rate continuously, placed as follows ^c : a) Miscellaneous site locations (4) b) A ring of stations (6) at or near the Site boundary c) Balance of stations (3) placed to serve as control stations d) Outside perimeter of ISFSI (4) ^d e) ISFSI protected area fence line (4) ^d	Quarterly	Gamma dose quarterly

- a. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to the Reporting Requirements of ODCM, Section III. Alternative media and locations may be chosen for any particular pathway if designated locations or media are not available, and appropriate substitutions are made within 30 days in the radiological environmental monitoring program.
- b. One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. The background dosimetry requirement also may be met through use of dosimeters shared with another facility, or from data provided by another entity, such as the State of Michigan, as appropriate for this site.
- c. For the purposes of this table, a TLD is considered to be one phosphor; two or more phosphors or phosphor readout zones in a packet are considered as two or more dosimeters.
- d. TLDs designated for ISFSI only operation.

Big Rock Point Environmental Sample Location Map



BIG ROCK POINT
CONTROL TLD LOCATIONS



Attachment 3

**Radiological Environmental Monitoring Program (REMP) Data for
Big Rock Point (BRP) Independent Spent Fuel Storage Installation (ISFSI)**



Global Dosimetry Solutions Environmental Report

Account	89567	RSCS
Location	00000DPT	
Monitoring Period	1/1/2009	
Process	0107535	
Arrived at GD	4/3/2009	

Badge Number	Name	Exposure mR
	CONTROL-DAILY	19
1	BR-5	25
2	BR-6	31
3	BR-7	39
4	BR-18	23
5	BR-19	26
6	BR-20	25
7	BR-22	31
8	BR-23	45
9	BR-24	30
10	BR-25	28
11	BR-SH1	18
12	BR-SH2	16
13	BR-CTRL1	19
14	BR-CTRL2	20
15	BR-21	19
16	BR-SP2	18

* - No control exposures have been subtracted, and only element, reader and fade corrections have been made.

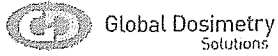


Global Dosimetry Solutions Environmental Report

Account:	89567	RSCS
Location:	00000DPT	
Monitoring Period:	4/1/2009	
Process:	0108886	
Arrived at GD:	7/7/2009	

Badge Number	Name	Exposure (mR)
	CONTROL	15
1	BR-5	20
2	BR-6	19
3	BR-7	21
4	BR-18	21
5	BR-19	24
6	BR-20	24
7	BR-22	23
8	BR-23	40
9	BR-24	26
10	BR-25	25
11	BR-SH1	14
12	BR-SH2	15
13	BR-CTRL1	14
14	BR-CTRL2	15
15	BR-21	18
16	BR-SF2	14

* - No control exposures have been subtracted, and only element, reader and fade corrections have been made.



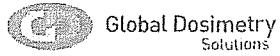
2652 McGaw Avenue Irvine, CA 92614 Tel: (949) 419-1000 Toll Free: (888) 437-1714 Fax: (949) 296-1144 www.dosimetry.com

Global Dosimetry Solutions Environmental Report

Account	89567	RSCS
Location	00000DPT	
Monitoring Period	7/1/2009	
Process	0110283	
Arrived at GD	10/9/2009	

Badge Number	Name	Exposure mR ^h
	CONTROL	14
1	BR-5	21
2	BR-6	19
3	BR-7	22
4	BR-18	19
5	BR-19	21
6	BR-20	21
7	BR-22	21
8	BR-23	40
9	BR-24	26
10	BR-25	20
11	BR-SH1	14
12	BR-SH2	14
13	BR-CTRL1	13
14	BR-CTRL2	14
15	BR-21	18
16	BR-SP2	14

* - No control exposures have been subtracted, and only element, reader and fade corrections have been made.



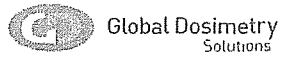
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Global Dosimetry Solutions Environmental Report

Account	89567	RSCS
Location	00000DPT	
Monitoring Period	10/1/2009	
Process	0111936	
Arrived at GD	1/19/2010	

Badge Number	Name	Exposure mR
	CONTROL	21
1	BR-5	25
2	BR-6	23
3	BR-7	26
4	BR-18	24
5	BR-19	24
6	BR-20	27
7	BR-22	26
8	BR-23	41
9	BR-24	28
10	BR-25	25
11	BR-SH1	17
12	BR-SH2	17
13	BR-CTRL1	17
14	BR-CTRL2	17
15	BR-21	23
16	BR-SP2	18
17	BR-SP1	17

* - No control exposures have been subtracted, and only element, reader and fade corrections have been made.



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Global Dosimetry Solutions Environmental Report

Account	89567	RSCS
Location	00001DPT	
Monitoring Period	1/1/2009	
Process	0111936	
Arrived at GD	1/19/2010	

Badge Number	Name	Exposure mR
	CONTROL-DAILY	38
1	BR-5	51
2	BR-6	60
3	BR-7	64
4	BR-18	48
5	BR-19	59
6	BR-20	71
7	BR-22	71
8	BR-23	132
9	BR-24	79
10	BR-25	64
11	BR-SH1	37
12	BR-SH2	31
13	BR-CTRL1	31
14	BR-CTRL2	31
15	BR-21	47
16	BR-SF2	30

* - No control exposures have been subtracted, and only element, reader and fade corrections have been made.