

6.2 Radiological Monitoring

The purpose of the Radiological Environmental Monitoring Program (REMP) is to verify that STP is operating within its design parameters and to ensure that offsite doses are as low as reasonably achievable (ALARA). The REMP confirms that radioactive materials released in effluents are not reconcentrated in the environment and that the concentrations, if observed, are as modeled in the Offsite Dose Calculation Manual (ODCM). Addition of STP 3 & 4 will not require changes to the monitoring requirements in the existing REMP for STP 1 & 2. This section presents the basis, contents, reporting, and quality assurance aspects of the REMP.

6.2.1 Radiological Environmental Monitoring Program Basis

Preoperational data obtained before the construction and operation of STP 1 & 2 provided a baseline for STP 1 & 2. The current REMP data will provide a baseline for STP 3 & 4.

The following radiation exposure pathways are currently monitored (References 6.2-1 and 6.2-2):

- Direct (exposure pathways measured by thermoluminescence dosimeters)
- Airborne (including iodine canisters and particulate filters)
- Waterborne (including surface water, groundwater, drinking water, and sediment)
- Ingestion (including milk if available, broadleaf vegetation, fish and invertebrates, and meat)

Figures 6.2-1 and 6.2-2 show existing radiological sampling locations near the site on a local and regional level, respectively. Table 6.2-1 summarizes the REMP sample media codes. Table 6.2-2 summarizes the media code, station code, vector, and sample location description. Table 6.2-3 provides details of the radiation exposure pathways monitored and the frequency of monitoring. REMP results indicate that operation of STP 1 & 2 has not resulted in adverse effects to human health or the environment. The maximum annual radiation exposure calculated for a hypothetical person living at the STP site boundary has consistently been less than 1 millirem (Reference 6.2-3).

Trending and comparison reviews performed as part of the program are used to identify changes in background levels when compared to baseline measurements. Changes in program implementation (including sampling techniques, frequencies, and locations) may occur based on monitoring results, the adequacy of analytical technique, and changes in technology.

The preoperational and operational radiological monitoring program will include measurements to evaluate the possible effects from STP 3 & 4 operations and to ensure that changes in environmental radioactivity can be detected.

6.2.2 Existing Radiological Environmental Monitoring Program Contents

The emphasis of the operational REMP is to verify source control at the plant. In meeting this objective, certain findings have been considered in formulating the operational REMP. Among these, the most important in relation to critical exposure paths and population groups, are the following:

- As of the most recent land use census conducted beyond a 5 mile radius (2006; Reference 6.2-1), no commercial dairy exists within 10 miles of the plant. However, there are ranches with beef cattle within a 10-mile radius. As verified by annual 0-5 mile ODCM Land Use Census results, there are no cows or goats within 5 miles whose milk is consumed by humans.
- There are extensive commercial crops grown—mainly rice, soybeans, grain sorghum, and cotton—in the region immediately surrounding the plant. The major portion of irrigation in this region is from the canal and levee systems with water controlled by the Lower Colorado River Authority in Bay City. Alternate irrigation comes from deep water wells 300 feet or greater in depth. Although three irrigation permits have been issued by the Lower Colorado River Authority for irrigation with Colorado River water taken downstream from the plant, these permits have not been exercised due to the brackish quality of the river in this area.
- Local towns derive their drinking water from groundwater wells; there is no population consumption of water from the Colorado River below the plant.
- There is substantial commercial harvesting of shellfish in Matagorda Bay, with the potential of harvesting fin fish as well depending on state controls. The Colorado River estuary is limited to sport fishing for human consumption and commercial fishing for bait species.
- Prevailing winds are from the south to east-southeast.

6.2.2.1 Program Summary

The design and implementation of the REMP, related surveillance activities, sample analysis, and reporting is performed by STPNOC. The monitoring program is a tiered system in which the level of surveillance is, in part, determined by effluent releases. The minimum program is outlined in the following sections and in Table 6.2-3.

The program is modeled after the minimum REMP described in the 1979 NRC Branch Technical Position (Reference 6.2-4). This program was approved by the NRC and was included in the original Technical Specifications for each STP 1 & 2 unit. The approved program was later relocated based on NRC guidance from the Technical Specifications to the STP ODCM. The **bold faced type** appearing in Table 6.2-2 highlights the requirements of the minimum REMP approved by the NRC for STP 1 & 2.

The sampling frequencies given in Table 6.2-3 were selected to conform to the 1979 NRC Branch Technical Position on environmental monitoring. In some cases, the sampling frequency is determined by inherent characteristics of the medium; e.g., air

filters can be run only 7–10 days before excessive pressure-drop arises. The frequency terms used in Table 6.2-3 generally mean once during the time period specified. Hence, annually means “some time during the year,” not 365 days from the previous sample collection time. Likewise, monthly means “during the calendar month,” not 30 days from the previous sample date. An effort is made to space the samples reasonably, but sample media availability, other scheduled activities, and equipment availability largely control the precise sample dates.

Typically, reporting units are pCi/m³ for air pCi/l for liquid, and pCi/kg for solid samples. The standard deviation of the net counting rate is computed using the gross counting rate and the background rate.

6.2.3 Existing Radiological Environmental Monitoring Program Reporting

An Annual Radioactive Effluent Release Report (Reference 6.2-3) for the STP site is prepared in accordance with the ODCM and its implementing procedures. Results from REMP implementation are evaluated and compared to previous years’ results to identify measurement trends, methodological consistency, and indications that program changes may be required.

An Inter-Laboratory Comparison Program exists to verify accuracy of sample results that are evaluated in the annual Radiological Environmental Operating Report.

A land-use census is conducted annually in accordance with the ODCM. Currently, the census is limited to an area within five miles of the STP units and is used to identify if revisions to the REMP are required. Parameters investigated include locations of nearest residence, milk production, and garden producing broad leaf vegetation.

In the event plant releases result in environmental measurements exceeding regulatory values or the results of an analysis indicate unexpected concentrations of radionuclides in the environment, a more vigorous sampling program may be instituted. In the event of an incident involving large releases of radioactivity from STP, an intensive sampling program would be initiated. This program would include special studies as appropriate for the particular incident and might include special reporting.

6.2.4 Existing Quality Assurance Program

The existing REMP is consistent with Regulatory Guide 4.15 (Reference 6.2-5). Quality assurance is provided in the existing NRC-approved REMP through quality training, a measurement assurance program that includes Inter-Laboratory Comparison Program tests, and administrative and technical procedures.

Control checks and tests are applied to the analytical operations by means of duplicate and/or split analyses of selected samples, and by the introduction of environmental samples with known nuclide concentrations. Calibrations are confirmed by participation in the Nuclear Energy Institute/National Institute of Standards and Technology Measurement Assurance Program.

6.2.5 Preoperational and Operational Radiological Monitoring Programs

The existing STP 1 & 2 REMP will serve as the preoperational radiological monitoring program and is already being implemented. The REMP for STP 3 & 4 will be based on NUREG 1302 and the NRC's Branch Technical Position Paper, "An Acceptable Radiological Environmental Monitoring Program," Revision 1, 1979 (Reference 6.2-4).

The STP 1 & 2 ODCM will be modified, as necessary, to comply with STP 3 & 4 Technical Specifications and will address the requirements of 10 CFR 50 Appendix I. An Annual Radiological Environmental Operating Report as required by the ODCM will be prepared covering all four STP units.

The ODCM contains a detailed description of the proposed monitoring program including (1) number and location of sample collection points and the pathways sampled or measured, (2) sample collection frequency, and sampling duration, (3) type and frequency of analysis, (4) general types of sample collection and monitoring equipment, (5) lower limit of detection for each analysis, and (6) quality-assurance program for radiological environmental monitoring programs (Reference 6.2-1).

As described in Section 5.4, no new exposure pathways will result from the addition of STP 3 & 4. Based on the current radiological sample locations at the Exclusion Area Boundary (EAB), as shown on Figure 6.2-1, and the dose assessment provided in Section 5.4, no additional radiological sampling at the EAB is proposed for STP 3 & 4. Additionally, based on the effluent release points for gaseous and liquid effluent discussed in Section 3.5 and the regional dose analysis provided in Section 5.4, no additional regional monitoring points are proposed. However, it is proposed that the centroid for the regional monitoring be moved to the midpoint between STP 2 & 3.

6.2.6 Tritium Monitoring

Tritium is a radioactive isotope of hydrogen that is produced in the reactor. During the licensing of STP 1 & 2, the presence of tritium was anticipated and accounted for in the Main Cooling Reservoir (MCR), the shallow aquifer and in discharge from relief wells from the MCR to surface water drainage pathways.

Tritium monitoring of surface water, drinking water, and groundwater is currently performed as part of the REMP, as summarized in Table 6.2-3. Supplemental samples are also collected from several other locations on site. Table 6.2-4 summarizes the additional tritium sampling locations. Figure 6.2-3 depicts the tritium monitoring locations. Precise sample station locations and frequencies may change based on sample availability and the need to better define the subsurface migration of tritium. The sampling locations listed in Table 6.2-2 are not part of the required REMP, however, these sample stations, and potentially others, will be used by STP for additional studies to monitor for tritium in groundwater. Although tritium has been identified and analyzed in groundwater and surface water samples, the average annual tritium concentrations observed in the MCR have remained below United States Nuclear Regulatory Commission reporting limits (30,000 pCi/l) and within United States Environmental Protection Agency (40CFR141.66[d]) and State of Texas (30 Texas Administrative Code 290.108) drinking water standards (20,000 pCi/l).

In addition, several additional investigatory monitoring points (G901–G912) were sampled during the STP 3 & 4 site investigation performed in the fall 2006. Figure 6.2-3 depicts the additional tritium monitoring locations that have been used in the additional tritium studies.

6.2.7 References

- 6.2-1 South Texas Project Offsite Dose Calculation Manual, Revision 14, January 2007.
- 6.2-2 South Texas Project 2006 Annual Environmental Operating Report, April 2007.
- 6.2-3 South Texas Project 2006 Annual Radioactive Effluent Release Report, April 2007.
- 6.2-4 “An Acceptable Radiological Environmental Monitoring Program,” U.S. Nuclear Regulatory Commission, Radiological Assessment Branch Technical Position, Revision 1, November 1979.
- 6.2-5 “Quality Assurance for Radiological Monitoring Programs (Normal Operation) - Effluent Streams and the Environment,” Regulatory Guide 4.15, Rev. 1, February 1979.
- 6.2-6 “Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors,” NUREG-1302, April 1991.

**Table 6.2-1 Radiological Environmental Monitoring Program
Sample Media Codes**

| Code | Sample Type | Code | Sample Type |
|-------------|-------------------------------------|-------------|------------------------------|
| AI | Airborne Radioiodine | L5 | Cabbage |
| AP | Airborne Particulate | L6 | Collard Greens |
| B1 | Resident Dabbler Duck | M1 | Beef Meat |
| B2 | Resident Diver Duck | M2 | Poultry Meat |
| B3 | Migratory Dabbler Duck | M3 | Wild Swine |
| B4 | Migratory Diver Duck | M4 | Domestic Swine |
| B5 | Goose | M5 | Eggs |
| B6 | Dove | M6 | Game Deer |
| B7 | Quail | M7 | Alligator |
| B8 | Pigeon | M8 | Rabbit |
| CC | Crustacean Crab | OY | Oyster |
| CS | Crustacean Shrimp | SO | Soil |
| DR | Direct Radiation | S1 | Sediment - Shoreline |
| F1 | Fish - Piscivorous | S2 | Sediment - Bottom |
| F2 | Fish - Crustacean & Insect Feeders | VB | Any Combination of L Samples |
| F3 | Fish - Herbivore & Detritus Feeders | VP | Pasture Grass |
| L1 | Banana Leaves | Wd | Drinking Water |
| L2 | Cana Leaves | Wg | Groundwater |
| L4 | Turnip Greens | Ws | Surface Water |
| | | WW | (Relief) Well Water |

**Table 6.2-2 Radiological Environmental Monitoring Program Sample Submission Code
(Pre-Application, Construction, Preoperation, & Operation)**

| Media Code | Station Code | Vector (Approximate) | Location Description |
|--------------------------|---------------------|---------------------------------|---|
| DR AI AP VB VP SO | 001 | 1 mile N | FM 521 |
| DR | 002 | 1 mile NNE | FM 521 |
| DR | 003 | 1 mile NE | FM 521 |
| DR | 004 | 1 mile ENE | FM 521 |
| DR | 005 | 1 mile E | FM 521 |
| DR AI AP SO | 006 | 3.5 miles ESE | Site near reservoir makeup pumping facility |
| DR | 007 | 3.5 miles SE | MCR Dike |
| DR | 008 | 0.25 mile SSE | MCR Dike |
| DR | 009 | 0.25 mile S | MCR Dike |
| DR | 010 | 0.25 mile SSW | MCR Dike |
| DR | 011 | 0.5 mile SW | MCR Dike |
| DR | 012 | 1.5 mile WSW | MCR Dike |
| DR | 013 | 1.5 mile W | FM 521 |
| DR | 014 | 1.5 mile WNW | FM 521 |
| DR AI AP VB SO VP | 015 | 1 mile NW | FM 521 |
| DR AI AP VB SO VP | 016 | 1 mile NNW | FM 521 |
| DR | 017 | 6.5 miles N | Buckeye - FM 1468 |
| DR AI AP SO | 018 | 5.5 miles NNE | Celanese Plant - FM 3057 |
| DR | 019 | 5.5 miles NE | FM 2668 |
| DR | 020 | 5 miles ENE | FM 2668 & FM 2078 |
| DR | 021 | 5 miles E | FM 521 & FM 2668 |

**Table 6.2-2 Radiological Environmental Monitoring Program Sample Submission Code
(Pre-Application, Construction, Preoperation, & Operation)
(Continued)**

| Media Code | Station Code | Vector (Approximate) | Location Description |
|--------------------------|---------------------|---------------------------------|---|
| DR | 022 | 7 miles E | Equistar Chemical Plant |
| DR | 023 [2] | 16 miles ENE | Intersection of FM 521 and FM 2540 |
| DR | 024 | 4 miles SSE | MCR Dike |
| DR | 025 | 4 miles S | MCR Dike |
| DR | 026 | 4 miles SSW | MCR Dike |
| DR | 027 | 2.5 miles SW | MCR Dike |
| DR | 028 | 5 miles WSW | FM 1095 & Ellis Road |
| DR SO | 029 | 4.5 miles W | FM 1095 |
| DR | 030 | 6 miles WNW | Tres Palacios Oaks, FM 2853 |
| DR | 031 | 5.5 miles NW | Wilson Creek Road |
| DR | 032 | 3.5 miles NNW | FM 1468 |
| DR AI AP SO | 033 | 14 miles NNE | Microwave Tower at end of Kilowatt Road in Bay City |
| DR | 034 | 7.5 miles ENE | Wadsworth Water Supply Pump Station |
| DR AI AP SO | 035 | 8.5 miles SSE | Matagorda |
| DR | 036 | 9 miles WSW | College Port |
| DR AI AP VB VP SO | 037 [2] | 10 miles WSW | Palacios AEP Substation |
| DR | 038 | 10.5 miles NW | AEP Substation on TX 71 near Blessing |
| DR AI AP SO | 039 | 9 miles NW | TX 35 under high voltage power lines near Tidehaven High School |
| DR | 040 | 4.5 miles SW | Citrus Grove |
| DR | 041 | 2.0 miles ESE | MCR Dike |
| DR | 042 | 8.5 miles NW | FM 459 at Tidehaven Intermediate School |
| DR | 043 | 4.5 miles SE | Site boundary at blowdown outlet |
| WS | 209 | 2 miles ESE | Kelly Lake |

**Table 6.2-2 Radiological Environmental Monitoring Program Sample Submission Code
(Pre-Application, Construction, Preoperation, & Operation)
(Continued)**

| Media Code | Station Code | Vector (Approximate) | Location Description |
|-------------------------|---------------------|---------------------------------|--|
| WD | 210 | On Site | Approved drinking water supply from STP |
| WS S1 | 211 [1] | 3.5 miles S | Site, E. Branch Little Robbins Slough |
| WS S1 | 212 [1] | 4 miles S | Little Robbins Slough |
| WS S1 | 213 | 4 miles SE | W. Branch Colorado River |
| F (1, 2, or 3) CC | 214 | 2.5 miles SE | MCR at Makeup Water Discharge |
| S2 | 215 | 0.5 mile SW | MCR at Circulating Water Discharge |
| WS S2 | 216 | 3.5 miles SSE | MCR at blowdown structure |
| F (1, 2, or 3) CC CS OY | 222 [1] | >10 miles | West Matagorda Bay |
| WS S(1 or 2) | 227 | 5-6 miles SE | West bank of Colorado River downstream of STP across from channel marker #22 |
| WD | 228 [2] | 14 miles NNE | Le Tulle Park public water supply |
| WS S1 | 229 | 2-3 miles ESE | Drainage ditch north of reservoir that empties into Colorado upstream from makeup pumping facility |
| S(1 or 2) | 230 [1] | 3.5 miles ESE | Colorado River at point where drainage ditch (#229) empties into it |
| S(1 or 2) WS | 233 [1] | 4.5 miles SE | Colorado River where MCR blowdown discharge channel empties into it |
| WG | 235 | 3.8 miles S | Well B-3 directly south from MCR |
| B8 | 236 | N/A | STP Protected Area |
| WS | 237 | 3.7 miles SSE | Blowdown discharge channel from MCR |
| S(1 or 2) WS | 242 [2] | >10 miles N | Colorado River where it intersects Highway 35 |
| WS | 243 [2] | >10 miles N | Colorado River upstream of Bay City Dam at the LCRA pumping station |

**Table 6.2-2 Radiological Environmental Monitoring Program Sample Submission Code
(Pre-Application, Construction, Preoperation, & Operation)
(Continued)**

| Media Code | Station Code | Vector (Approximate) | Location Description |
|---------------------|---------------------|---------------------------------|--|
| WS | 245 | 4.5 mile SSE | Water well approximately 60' deep located on private property about 0.5 miles south of the MCR |
| WS | 247 | <1 mile E | Essential Cooling Pond |
| F(1,2, or 3) | 249 [2] | N/A | Control sample purchased from a local retailer |
| SO | 250 | 0.75 miles NW | Sewage sludge land farming area |
| WG | 251 | 4.0 miles SSE | Test Well B-4, upper aquifer |
| F(1, 2, or 3) CC S2 | 300 | S | MCR |
| WW | 701 | 4 miles S | MCR Relief Well #440 |
| WS | Q01 | N/A | Quarterly composite of station #227 and/or alternate #233 (1) |
| WS | Q02 | N/A | Quarterly composite of station #243 and/or alternate #242 (1) |

[1]This station may be used to obtain the required aquatic samples in the vicinity of STP that may be influenced by plant operations.

[2]Control Station

MCR - STP Main Cooling Reservoir

Media codes typed in bold satisfy collection requirement described in Table 6.2-3

Station codes printed in bold identify offsite locations

**Table 6.2-3 Radiological Environmental Monitoring Program
(Pre-Application, Construction, Preoperation, Operation)**

| Sample Media, Number, Approximate Location and Distance of Sample Stations from Containment | No. Sampling Stations | Routine Sampling Mode | Sampling and Collection Frequency | Analysis Type | Minimum Analysis Frequency |
|--|-----------------------|-------------------------------|---|--|--|
| Direction Radiation | | | | | |
| Exposure Media: TLD 16 – Located in all 16 meteorological sectors, 0.2 [1] to 4 miles 16 – Located in all 16 meteorological sectors, 2 to 7 miles 6 – Located in special interest areas (e.g., schools, population centers), within 14 miles 2 – Control stations located in areas of minimal wind direction (WSW, ENE), 10-16 miles | 40 | Continuously | Quarterly | Gamma Dose | Quarterly |
| Airborne | | | | | |
| Exposure Media: Charcoal and Particulate Filters 3 – Located at the exclusion zone, N, NNW, NW sectors, 1 mile 1 – Located in Bay City, 14 miles 1 – Control Station, located in a minimal wind direction (WSW), 10 miles | 5 | Continuous sampler operations | Weekly or more frequently if required by dust loading | <u>Radionuclide Canister:</u> I-131 <u>Particulate Sampler:</u> Gross Beta Activity Gamma Isotopic of composite (by location) | Weekly Following filter change Quarterly |

**Table 6.2-3 Radiological Environmental Monitoring Program
(Pre-Application, Construction, Preoperation, Operation) (Continued)**

| Sample Media, Number, Approximate Location and Distance of Sample Stations from Containment | No. Sampling Stations | Routine Sampling Mode | Sampling and Collection Frequency | Analysis Type | Minimum Analysis Frequency |
|--|-----------------------|--|-----------------------------------|--|--------------------------------|
| Waterborne | | | | | |
| <u>Surface Water</u> | | | | | |
| 1 – Located in MCR at the MCR blowdown structure | 9 | Composite sample over a 1 month period (grab if not available) | Monthly | Gamma Isotopic | Monthly |
| 1 – Located above the site on the Colorado River not influenced by plant discharge (control) | | | | Tritium | Quarterly Composite |
| 1 – Located downstream from blowdown entrance into the Colorado River | | | | | |
| <u>Groundwater</u> | | | | | |
| 1 – Located at well downgradient in the shallow aquifer (B-4) | | Grab | Quarterly | Gamma Isotopic and Tritium | Quarterly |
| <u>Drinking Water (Tap)</u> | | | | | |
| 1 – Located on site [2] 1 – Located at a control station | | Grab | Quarterly | Gamma Isotopic and Gamma Isotopic Tritium | Monthly Quarterly Composite |
| <u>Sediment</u> | | | | | |
| 1 – Located above the site on the Colorado River, not influenced by plant discharge | | Grab | Semiannually | Gamma Isotopic | Semiannually |
| 1 – Located downstream from blowdown entrance into the Colorado River | | | | | |
| 1 – Located in MCR | | | | | |

**Table 6.2-3 Radiological Environmental Monitoring Program
(Pre-Application, Construction, Preoperation, Operation) (Continued)**

| Sample Media, Number, Approximate Location and Distance of Sample Stations from Containment | No. Sampling Stations | Routine Sampling Mode | Sampling and Collection Frequency | Analysis Type | Minimum Analysis Frequency |
|--|-----------------------|-----------------------|--|-----------------------------------|--|
| Ingestion | | | | | |
| Milk [3] | 7 | Grab | Semi-monthly when animals are on pasture; monthly at other times | Gamma-Isotopic and I-131 | Semi-monthly when animals are on pasture; monthly at other times |
| <u>Broadleaf Vegetation</u> [4] 2 – Located at the exclusion zone, N, NW, or NNW sectors 1 – Located in a minimal wind direction | | Grab | Monthly during growing season (when available) | Gamma-Isotopic and I-131 | As collected |
| <u>Fish and Invertebrates (edible portions)</u> 1 – Representing commercially or recreational important species in vicinity of STP that may be influenced by plant operation 1 – Same or analogous species in area not influenced by STP 1 – Same or analogous species in the MCR | | Grab | Sample semiannually | Gamma-Isotopic on edible portions | As collected |
| <u>Agriculture Products</u> [5] | | Grab | At time of harvest | Gamma-Isotopic on edible portions | As collected |
| <u>Domestic Meat</u> 1 – Represents domestic stock fed on crops grown exclusively within 10 miles of plant | | Grab | Annually | Gamma-Isotopic | As collected |

Source - Reference 6.2-1

[1]The inner ring of stations in the southern sector is located within one mile due to the main cooling reservoir.

[2]No municipal water systems affected by STP. This sample taken from deep aquifer supplying drinking water to employees at work.

[3]Limited source of sample in the vicinity of STP.

[4]Three different kinds of broadleaf vegetation are to be collected over the growing season, not each collection period.

[5]No sample stations have been identified in the vicinity of the site. Presently, no agricultural land is irrigated by water into which liquid plant wastes will be discharged. Agricultural products will be considered if these conditions change.

Table 6.2-4 Tritium Monitoring Program

| Well Number | Sample ID | Depth, ft below ground surface |
|--|------------------|---------------------------------------|
| Piezometer Well # 415 | 255 | 110 |
| Piezometer Well # 417 | 256 | 100 |
| Piezometer Well # 421-02 | 257 | 80 |
| Piezometer Well # 435-01 | 258 | 50 |
| Piezometer Well # 435-02 | 259 | 50 |
| Piezometer Well # 437 | 260 | 74 |
| Piezometer Well # 446 | 205 | 78 |
| Piezometer Well # 446A | 206 | 40 |
| Piezometer Well # 447 | 263 | 104 |
| Piezometer Well # 447A | 264 | 46 |
| Piezometer Well # 602A | 266 | 40 |
| Windmill north of heavy haul road near Well #417 | 267 | NA |
| Windmill east of MCR | 268 | NA |
| Water well located on private property approx. 1/4 mile south of MCR | 245 | NA |
| Windmill south of the east corner of STP MCR on private land | 269 | NA |
| G-901 | NA | Various |
| G-902 | NA | |
| G-903 | NA | |
| G-904 | NA | |
| G-905 | NA | |
| G-906 | NA | |
| G-907 | NA | |
| G-908 | NA | |
| G-909 | NA | |
| G-910 | NA | |
| G-911 | NA | |
| G-912 | NA | |

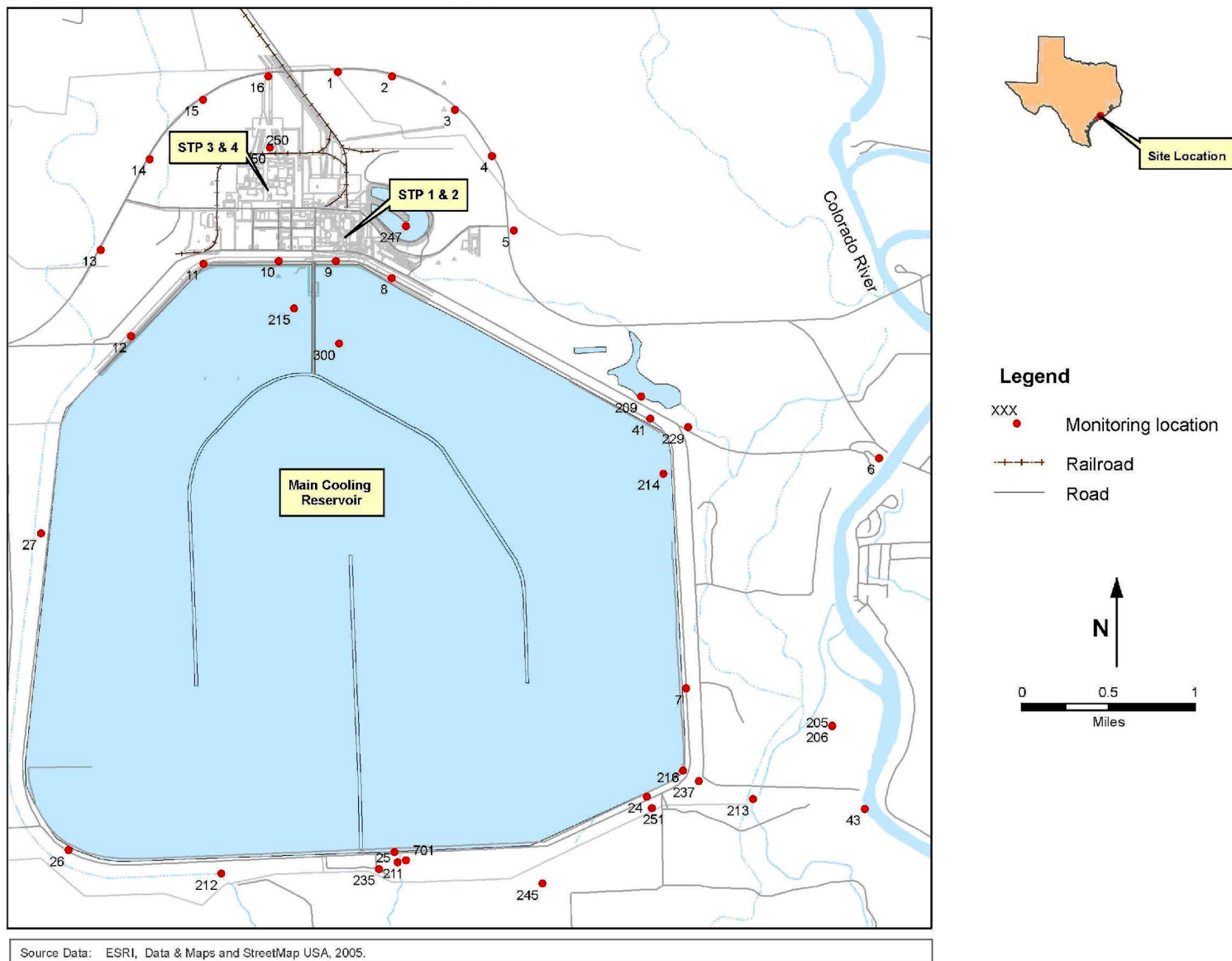


Figure 6.2-1 Radiological Monitoring Designated Sample Locations – Onsite Locations

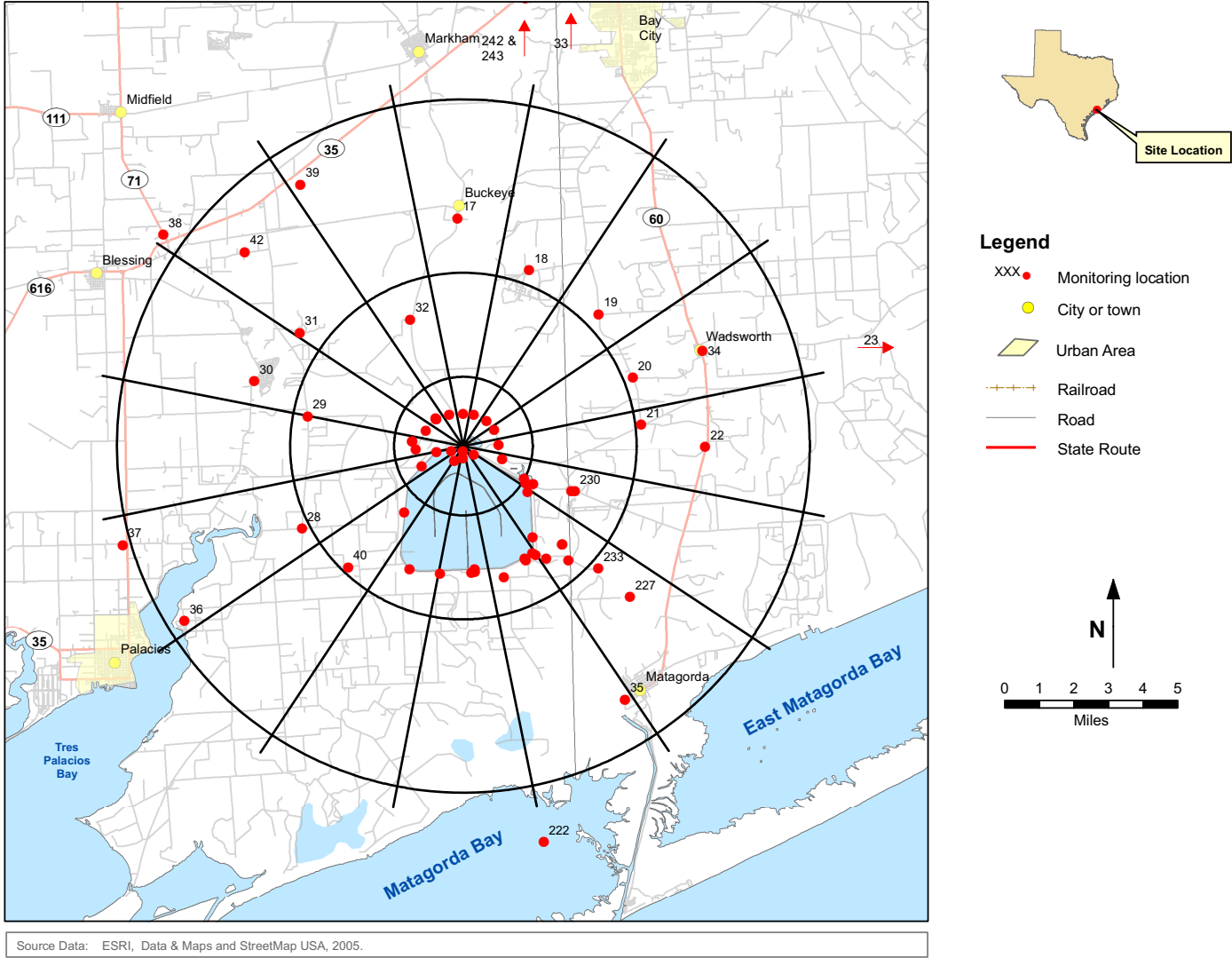


Figure 6.2-2 Current Radiological Monitoring Designated Sample Locations – Regional

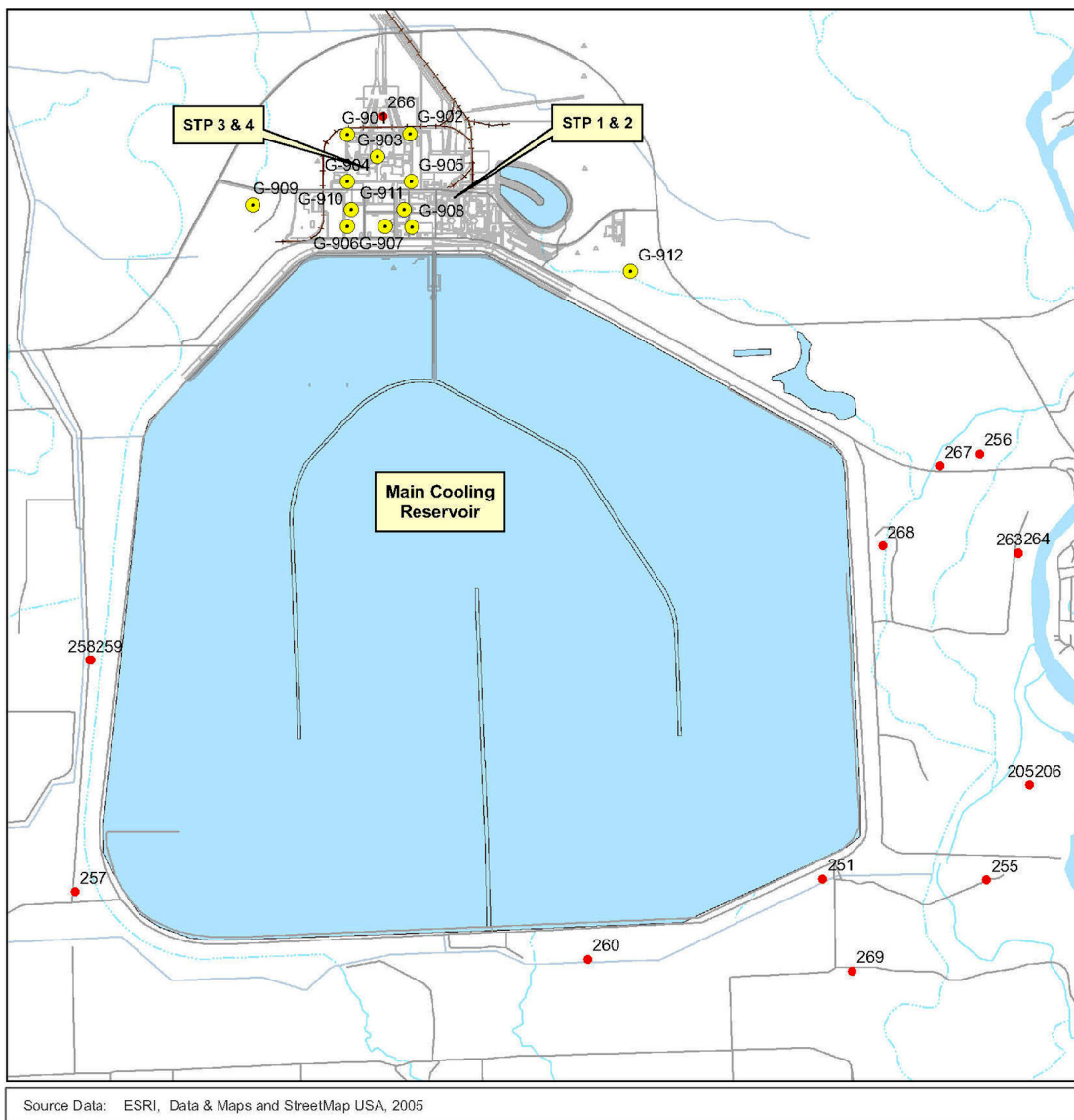
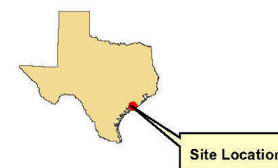


Figure 6.2-3 Tritium Monitoring Locations - Groundwater



Legend

- XXX
● COL monitoring location
- YYY
● Monitoring location
- XXX
● YYY Two closely-spaced monitoring locations
- +—+—+— Railroad
- Road
- State Route

