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June 18, 2012

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Duke Energy Carolinas, LLC  
Oconee Nuclear Station  
Docket Numbers 50-269, 50-270, and 50-287  
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached the latest revisions to the Oconee Selected Licensee Commitments (SLC) Manual. SLC Change 2012-01 revised SLC 16.11.6, to clarify reporting requirements for environmental samples exceeding reporting levels of Table 16.11.6-3, "Reporting Levels for Radioactivity Concentrations in Environmental Samples."

Sincerely,

*TP GILLESPIE*  
T. Preston, Gillespie, Jr.  
Vice President  
Oconee Nuclear Station

RGJ/rgj  
Attachment

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MRR

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xc:

Mr. Victor McCree, Regional Administrator  
U.S. Nuclear Regulatory Commission, Region II  
Marquis One Tower  
245 Peachtree Center Ave., NE, Suite 1200  
Atlanta, GA 30303-1257

Mr. John Boska  
U.S. Nuclear Regulatory Commission  
(file via e-mail)  
One White Flint North, M/S O-8G9A  
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Mr. Andrew Sabisch  
Senior NRC Resident Inspector  
Oconee Nuclear Station

June 18, 2012

Subject: Oconee Selected Licensee Commitments Manual (SLC) Revision

On May 8, 2012, Station Management approved Selected Licensee Commitments (SLC) Change 2012-01 to revise SLC 16.11.6, to clarify reporting requirements for environmental samples exceeding reporting levels of Table 16.11.6-3, "Reporting Levels for Radioactivity Concentrations in Environmental Samples."

Please revise your manual as instructed below.

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Any questions concerning these revisions may be directed to Kent Alter at 864-873-3255.

Regulatory Compliance  
By: Gail Joyner  
Regulatory Compliance

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16.11 RADIOLOGICAL EFFLUENTS CONTROL

16.11.6 Radiological Environmental Monitoring

- COMMITMENT
- a. The radiological environmental monitoring samples shall be collected in accordance with Table 16.11.6-1 and shall be analyzed pursuant to the requirements of Tables 16.11.6-1 and 16.11.6-2.
  - b. A land use census shall be conducted and shall identify the location of the nearest milk animal and the nearest residence in each of the 16 meteorological sectors within a distance of eight kilometers (five miles). Broad leaf vegetation sampling shall be performed at the site boundary in the direction sector with the highest D/Q in lieu of the garden census.
  - c. Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program. A summary of the results obtained as part of the Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report. The Interlaboratory Comparison Program shall be described in the Annual Radiological Environmental Operating Report.
  - d. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report.

-----NOTE-----  
If samples required by Commitment part a, become permanently unavailable from any of the required sample locations, the locations from which samples were unavailable may then be deleted from the program provided replacement samples were obtained and added to the environmental monitoring program, if available. These new locations will be identified in the Annual Radioactive Effluent Release Report.  
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APPLICABILITY: At all times



ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Radiological environmental monitoring program is not conducted as required.</p>	<p>A.1 Submit a description of the reason for not conducting the program as required and plans to prevent a recurrence shall be included in the Annual Radiological Environmental Operating Report.</p>	<p>May 15 of following calendar year</p>
<p>B. Land use census identifies a Location which yields a calculated dose or dose commitment (via the same exposure pathway) 20% greater than a location from which samples are currently being obtained.</p>	<p>B.1 -----NOTE----- The sampling location having the lowest calculated dose or dose commitment (via the same exposure pathway) may be deleted from this monitoring program after October 31 of the year in which this land use census was conducted. ----- Add new location to the radiological environmental monitoring program.</p> <p><u>AND</u></p> <p>B.2 Identify new locations in the next Annual Radioactive Effluent Release Report.</p>	<p>30 days</p> <p>April 30 of following calendar year</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Interlaboratory Comparison Program analyses not performed as required.	C.1 Report corrective actions in the Annual Radiological Environmental Operating Report.	May 15 of following calendar year
D. Radioactivity level resulting from plant effluents in environmental sampling medium at a specified location in excess of reporting limits of Table 16.11.6-3 when averaged over a calendar quarter.	D.1 Prepare and submit a Special report that identifies the cause for exceeding the limits and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of SLC 16.11.1 or 16.11.2.	30 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 16.11.6.1 Conduct land use census during growing season using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities.	12 months

Table 16.11.6-1  
Radiological Environmental Monitoring Program

Exposure Pathway and/or Sample	Number of Sample Locations (b)	Sampling and Collection Frequency (d)	Time and Frequency of Analysis
1. AIRBORNE			
Radioiodine and Particulates	5	Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading.	Radioiodine canister: I-131 analysis weekly. Particulate sampler: Gross beta radioactivity analysis following filter change; and gamma isotopic analysis of composite (by location) quarterly. (c)
2. DIRECT RADIATION	40	Quarterly.	Gamma dose quarterly.
3. WATERBORNE			
a. Surface	2	Composite (a) sample over a 1-month period.	Gamma isotopic analysis monthly. Composite for tritium analysis quarterly.
b. Drinking	3	Composite (a) sample over a 1-month period.	Composite for gross beta and gamma isotopic analyses monthly. Composite for tritium analysis quarterly.
c. Sediment from Shoreline	2	Semiannually.	Gamma isotopic analysis semiannually.

Table 16.11.6-1  
Radiological Environmental Monitoring Program

Exposure Pathway and/or Sample	Number of Sample Locations (b)	Sampling and Collection Frequency (d)	Time and Frequency of Analysis
<b>4. INGESTION</b>			
a. Milk	4(e)	Semimonthly when animals are on pasture; monthly at other times.	Gamma isotopic and I-131 analysis semimonthly when animals are on pasture; monthly at other times.
b. Fish	2	Semiannually. One sample each commercially and recreationally important species.	Gamma isotopic analysis semiannually on edible portion.
c. Broad-leaf Vegetation	2	Monthly.	Gamma isotopic analysis monthly.

- (a) Composite samples shall be collected by collecting an aliquot at intervals not exceeding 2 hours.
- (b) Sample locations are identified in the ODCM.
- (c) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.
- (d) Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, or to malfunction of automatic sampling equipment. If the latter, every effort shall be made to complete corrective action prior to the end of the next sampling period.
- (e) Samples from milking animals in three locations within 5 km distance having the highest dose potential. If there are none, then one sample from milking animals in each of three areas between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per year. One sample from milking animals at a control location, as for example 15 to 30 km distant and in the least prevalent wind direction.

Table 16.11.6-2  
Maximum Values for the Lower Limits of Detection (LLD) (a) (c)

Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m <sup>3</sup> )	Fish (pCi/kg, wet)	Milk (pCi/l)	Broad-leaf Vegetation (pCi/kg, wet)	Sediment (pCi/kg, dry)
Gross Beta	4	1E-02				
H <sub>3</sub>	2,000					
Mn-54	15		130			
Fe-59	30		260			
Co-58	15		130			
Co-60	15		130			
Zn-65	30		260			
Zr-95	15					
Nb-95	15					
I-131	15(b)	7E-02		1	60	
Cs-134	15	5E-02	130	15	60	150
Cs-137	18	6E-02	150	18	80	180
Ba-140	15			60		
La-140	15			15		

- (a) The LLD is defined, for purposes of these commitments, as the smallest concentration of radioactive material in a sample with 95% probability of detection and with 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system (which may include radiochemical separation):

$$LLD = \frac{4.66 S_b}{E \times V \times 2.22 \times Y \times \exp(-\lambda \Delta t)}$$

Where:

LLD is the lower limit of detection as defined above (as pCi per unit mass or volume)

S<sub>b</sub> is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (as counts per minute)

Table 16.11.6-2  
Maximum Values for the Lower Limits of Detection (LLD) (a) (c)

E is the counting efficiency (as counts per disintegration)

V is the sample size (in units of mass or volume)

2.22 is the number of disintegrations per minute per picocurie

Y is the fractional radiochemical yield (when applicable)

$\lambda$  is the radioactive decay constant for the particular radionuclide

$\Delta t$  is the elapsed time between sample collection (or end of the sample collection period) and time of counting

Typical values of E, V, Y and  $\Delta t$  should be used in the calculation.

The LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as a posteriori (after the fact) limit for a particular measurement.

Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidably small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances, may render these LLDs unachievable. In such cases, the contributing factors will be identified and described in the Annual Radiological Environmental Operating Report.

- (b) LLD for gamma isotopic analysis for I-131 in drinking water samples. Low level I-131 analysis on drinking water will not be routinely performed because the calculated dose from I-131 in drinking water at all locations is less than 1 mrem per year. Low level I-131 analyses will be performed if abnormal releases occur which could reasonably result in  $> 1$  pCi/liter of I-131 in drinking water. For low level analyses of I-131 an LLD of 1 pCi/liter will be achieved.
- (c) Other peaks which are measurable and identifiable, together with the radionuclides in Table 16.11.6-2, shall be identified and reported.

Table 16.11.6-3  
Reporting Levels for Radioactivity Concentrations in Environmental Samples (c) (d)

Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m <sup>3</sup> )	Fish (pCi/kg, wet)	Milk (pCi/l)	Broad-leaf Vegetation (pCi/kg, wet)
H-3	2E04(a)				
Mn-54	1E03		3E04		
Fe-59	4E02		1E04		
Co-58	1E03		3E04		
Co-60	3E02		1E04		
Zn-65	3E02		2E04		
Zr-Nb-95	4E02				
I-131	2(b)	0.9		3	1E02
Cs-134	30	10	1E03	60	1E03
Cs-137	50	20	2E03	70	2E03
Ba-La-140	2E02			3E02	

(a) For drinking water samples. This is 40 CFR Part 141 value.

(b) If low level I-131 analyses are performed.

(c) Report shall be submitted when any single radionuclide exceeds the reporting level in Table 16.11.6-3 or when more than one of the radionuclides in Table 16.11.6-3 are detected in sampling medium and

$$\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots \geq 1.0$$

(d) Report shall be submitted when radionuclides other than those in table 16.11.6-3 are detected and are the result of plant effluents if the potential annual dose to a MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of SLC 16.11.1 or 16.11.2.

## BASES

The environmental monitoring program required by this commitment provides measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures of individuals resulting from the station operation. This monitoring program thereby supplements the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and modeling of exposure pathways. The initially specified monitoring program will be effective for at least the first three years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The detection capabilities required by Table 16.11.6-2 are considered optimum for routine environmental measurements in industrial laboratories. The specified lower limits of detection correspond to less than the 10 CFR 50, Appendix I, design objective dose-equivalent of 45 mrem/year for atmospheric releases to the most sensitive organ and individual. The land use census commitment is provided to assure that changes in the use of unrestricted areas are identified and that modifications to the monitoring program are provided if required by the results of this census.

The requirements for participation in an Interlaboratory Comparison Program is provided to assure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of a quality assurance program for environmental monitoring in order to demonstrate that the results are reasonably valid.

With the level of radioactivity in an environmental sampling medium at a specified location exceeding the reporting levels of Table 16.11.6-3 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days a Special Report that defines the corrective action to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of SLC 16.11.1 or SLC 16.11.2. When more than one of the radionuclides in Table 16.11.6-3 are detected in the sampling medium, this report shall be submitted if

$$\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots \geq 1.0$$

When radionuclides other than those in Table 16.11.6-3 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to a MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of SLC 16.11.1 or SLC 16.11.2. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report required by Technical Specification 5.6.2. The methodology and parameters used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in the 30-day Special Report.



The following requirement(s) were relocated from the CTS 6.4.4.f during the conversion to ITS.

The station shall have a program to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in UFSAR Chapter 16, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

1. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;
2. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census; and,
3. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

REFERENCES:

1. 10 CFR Part 50, Appendix I.
2. Offsite Dose Calculation Manual.