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Vermont Yankee Nuclear Power Station
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ISFSI Manager

10 CFR 50, Appx I, SEC IV.B.2 and IV.B.3

BVY 19-017

May 14, 2019

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

SUBJECT: 2018 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 10 CFR 50, Appendix I, Sections IV.B.2 and IV.B.3 and the Vermont Yankee (VY) Off-site Dose Calculation Manual, please find enclosed a copy of the 2018 Annual Radiological Environmental Operating Report.

This letter contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Mr. Thomas B. Silko at (802) 451-5354, Ext 2506.

Sincerely,

CRD/tbs

Enclosure: Annual Radiological Environmental Operating Report for 2018

cc: Mr. David C. Lew
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Enclosure

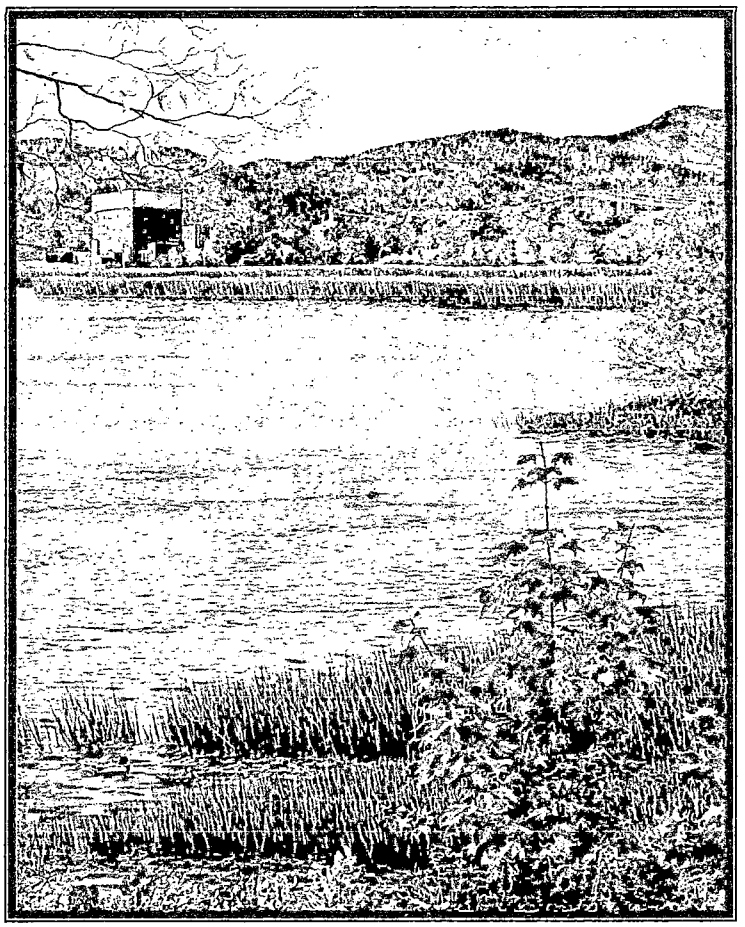
Vermont Yankee Nuclear Power Station

Annual Radiological Environmental Operating Report for 2018
(86 pages)

NORTHSTAR - VERMONT YANKEE
Vermont Yankee Nuclear Power Station

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

Year 2018



Prepared by: _____ 5/9/2019
Stephen Skibniowsky, REMP Specialist — Date

Reviewed by: Scott Dorval _____ 5/9/2019
Scott Dorval, ISFSI RP/Env. Program Manager — Date

Approved for Distribution: _____ 5/13/19
Mike Pletcher, Plant RP/Chemistry Manager — 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 2018. 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 the Vermont Yankee Offsite Dose Calculation Manual (VY ODCM), Section 10.2. 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 2018 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 2018 environmental TLD measurements.

Section 6: Provides the results of the 2018 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 Environmental Dosimetry Company and Teledyne Brown Engineering for contracted analyses of environmental media.

Section 8: Summarizes the requirements and the results of the 2018 Land Use Census.

Section 9: Gives a summary of the 2018 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 significant 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 (prior to year 2011) 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. Some smaller amounts of radioactivity were detected in the environment following the Fukushima Daiichi plants accidents in March 2011. 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 test performed 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 concentrated and often 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 weapons-testing 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 generation capacity increasing to 650 megawatts electric.

A decision was made in 2013 to permanently shut down and decommission Vermont Yankee Nuclear Power Station at the end of 2014. The last day of power operation occurred on December 29, 2014.

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 functioning 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 Radiation Protection/Chemistry Department conducts the radiological environmental monitoring program and facilitates the collection of all airborne, terrestrial and ground water samples. VYNPS maintained a contract with Normandeau Associates to collect all fish, river water and river sediment samples. In 2018, analytical measurements of environmental samples were performed at Teledyne Brown Engineering Laboratory in Knoxville, Tennessee. TLD badges are posted and retrieved by the Vermont Yankee Chemistry Department, and were analyzed by the Environmental Dosimetry Company in Sterling, 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

Waterborne Pathways
- River Water Sampling
- Ground Water Sampling
- Sediment Sampling

Ingestion Pathways
- 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 were installed at seven locations until August 4, 2015, when sample collection was discontinued at one station not required by the VY ODCM. Another station was removed from service in March 2016 (ODCM Rev 36) because it was a non-required control sample and with the plant in permanent shut down, it was deleted from the REMP. In December 2016, two more air sample stations were removed from service with the release of ODCM Rev 37. At the beginning of 2018, three air sample stations were situated to support the program. Currently there are two indicator stations and one control station. Data from all samples collected in 2018 are included in this report. 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 through the end of October 2018. Due to changes in the VY ODCM, the weekly collections were revised to monthly during November and December, 2018. 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 are 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.

4.3.2 Charcoal Cartridge (Radioiodine) Sampling

Continuous air samplers were installed at seven locations until August 4, 2015 when sample collection was discontinued at one station not required by the VY ODCM. One station was removed in March 2016 (ODCM Rev 36) because it was a non-required control sample and with the plant in permanent shut down, it was removed from the REMP. In December 2016 all charcoal filters were removed from sample stations with the implementation of ODCM Rev 37. With the radioactive decay and ultimate cessation of I-131 in the plant effluent stream, there is no longer a credible source of radioiodines generated by VYNPS. Data is shown in this report for all samples collected in 2018.

4.3.3 River Water Sampling

An automatic compositing sampler is maintained at the downstream sampling location by the Vermont Yankee Radiation Protection/Chemistry Department staff. Normandeau Associates personnel maintained 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 minimum frequency of quarterly tritium (H-3) analysis.

4.3.4 Ground Water (Deep Well Potable Water) Sampling

Grab samples are collected quarterly from two 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 were 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. Two additional locations are also sampled: SE-10 (River Station 3-3) and SE-21 (Rte. 9 Bridge Station 3-8). These two stations are not required by the VY ODCM.

4.3.6 Milk Sampling

Milk sample collection was terminated in December 2016 based upon assessment of potential releases of radioiodines from the plant and a concurrent revision of the Vermont Yankee Offsite Dose Calculation Manual. Radioactive decay has removed I-131 from plant radioactive materials inventory.

4.3.7 Silage (Chopped Corn or Grass) Sampling

Silage samples are collected on a quarterly basis from two Land Use Census-identified indicator farms and one control farm. The silage from each location is shipped to the contracted environmental laboratory where each sample is analyzed for gamma-emitting radionuclides.

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. Until iodine sampling was discontinued by ODCM Rev 37 in December 2016, the grass samples were analyzed for low-level I-131. This analysis was not required by the ODCM, but had been performed for a number of years.

4.3.9 Fish Sampling

Fish samples were collected semiannually at two Connecticut River locations (upstream of the plant and in the Vernon Pond) by Normandeau Associates during 2018. The samples are frozen and delivered to the environmental laboratory where the edible and inedible portions are separately 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 10 incident response stations were required by the ODCM in 2018 and must be read out quarterly unless gaseous release controls were exceeded during the period. In addition to the TLDs required by the ODCM, an additional nineteen were posted at areas of interest and control station areas during calendar year 2018. Vermont Yankee Radiation Protection/Chemistry Department staff posts and retrieves all TLDs, while the contracted environmental laboratory (Environmental Dosimetry Company) 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)	10	Continuous	Quarterly	Gamma dose; de-dose only, unless gaseous release Control was exceeded	Each TLD
2. Airborne (Particulates)	3	Continuous	Weekly (changed to monthly with the issuance of Rev.40 of the VY ODCM in October 2018)	Particulate Sample: Gross Beta	Each Sample
				Gamma Isotopic	Quarterly Composite (by location)
3. Waterborne					
a. Surface water	2	Downstream. Automatic composite	Monthly	Gamma Isotopic Tritium (H-3)	Each Sample Quarterly Composite
b. Ground water	3	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.

+Other Locations are sampled but not required by the VY ODCM

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. Fish	2	Grab	Semiannually	Gamma Isotopic on edible portions	Each sample
b. Vegetation					
Grass sample	1 at each air sampling station	Grab	Quarterly when available	Gamma Isotopic	Each sample
Silage sample	2 Indicator 1 Control	Grab	Quarterly	Gamma Isotopic	Each sample

* See ODCM Table 3.5.1 for complete footnotes.

TABLE 4.2

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2018 VERMONT YANKEE NUCLEAR POWER STATION

Exposure Pathway	Station Code	Station Description	Zone[a]	Distance From Plant Stack (km)	Direction From Plant
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-21	Spofford Lake	C	16.4	NNE
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	Main Plant Well	I	0.2	On-site
	WG-12	Vernon Green Well	I	2.1	SSE
	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 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 2018
VERMONT YANKEE NUCLEAR POWER STATION

Exposure Pathway	Station Code	Station Description	Zone[a]	Distance From Plant Stack(km)	Direction From Plant Stack
3. Ingestion					
a. Fish	FH-11	Vernon Pond	I	0.6[b]	SSE
	FH-21	Rt.9 Bridge	C	11.8	NNW
b. Mixed Grass	TG-11	River Sta. No. 3.3	I	1.9	SSE
	TG-12	N. Hinsdale, NH	I	3.6	NNW
	TG-21	Spofford Lake	C	16.4	NNE
c. Silage	TC-11	Miller Farm	I	0.8	W
	TC-18	Blodgett Farm	I	3.6	SE
	TC-22	Franklin Farm	C	9.7	WSW

(a) I = Indicator Stations; C = Control Stations
(b) Fish samples are collected anywhere in Vernon Pond (Connecticut River, Vernon Hydro Station impoundment), which is adjacent to the plant (see Figure 4.1).

TABLE 4.3

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2018
VERMONT YANKEE NUCLEAR POWER STATION

Station Code	Station Description	Zone[a]	Distance From Plant (km) [b]	Direction From Plant[b]
DR-1	River Sta. No. 3.3	AI	1.6	SSE
DR-2	N. Hinsdale, NH	AI	3.9	NNW
DR-3	Hinsdale Substation	AI	3.0	E
DR-4	Northfield, MA	C	11.3	SSE
DR-5	Spofford Lake	C	16.5	NNE
DR-6	Vernon School	AI	0.52	WSW
DR-7	Site Boundary[c]	SB	0.28	W
DR-7A	West Cornfield	SB	0.46	SW
DR-7B	West Cornfield	SB	0.42	SW
DR-8	Site Boundary	IR	0.25	SSW
DR-41	Site Boundary	IR	0.38	SSW
DR-42	Site Boundary	IR	0.59	S
DR-43	Site Boundary	IR	0.44	SSE
DR-44	Site Boundary	IR	0.19	SE
DR-45	Site Boundary	IR	0.12	NE
DR-46	Site Boundary	IR	0.28	NNW
DR-47	Site Boundary	IR	0.50	NNW
DR-48	Site Boundary	IR	0.82	NW
DR-49	Site Boundary	IR	0.55	WNW
DR-50	Gov. Hunt House PR	AI	0.41	SSW
DR-51	Site Boundary	SB	0.26	W
DR-51A	West Cornfield	SB	0.26	W
DR-52	Site Boundary	SB	0.24	SW
DR-52A	Tkaczyk House Lawn	SB	0.38	SW
DR-53	Site Boundary	SB	0.23	WSW
DR-53A	West Cornfield	SB	0.34	WSW
DR-MET	New Met Tower	SB	0.65	WNW
GHH	Governor Hunt House Historic Sign	SB	0.41	S
STATE-A	West Cornfield	SB	0.34	WSW

(a) IR= Incident Response TLD; AI= Area of Interest TLD; C =Control TLD; SB =Site Boundary TLD.

(b) 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)	Vegetation (pCi/Kg)	Sediment (pCi/Kg - dry)
Gross-Beta	4	0.01			
H-3	2000[(a)]				
Mn-54	15		130		
Co-60	15		130		
Zn-65	30		260		
Zr- 95	15				
Cs-134	15	0.05	130	60	150
Cs-137	18	0.06	150	60	180

(a) If no drinking water pathway exists, a value of 3000 picocuries/liter may be used.

See ODCM Table 4.5.1 for additional 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)	Food Product (pCi/Kg)	Sediment (pCi/Kg-dry)
H-3	20,000[a]				
Mn-54	1000		30,000		
Co-60	300		10,000		3000[b]
Zn-65	300		20,000		
Zr- 95	400				
Cs-134	30	10	1000	1000	
Cs-137	50	20	2000	2000	

(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 individual grab samples taken at North Storm Drain Outfall only.

See ODCM Table 3.5.2 for additional explanatory footnotes.

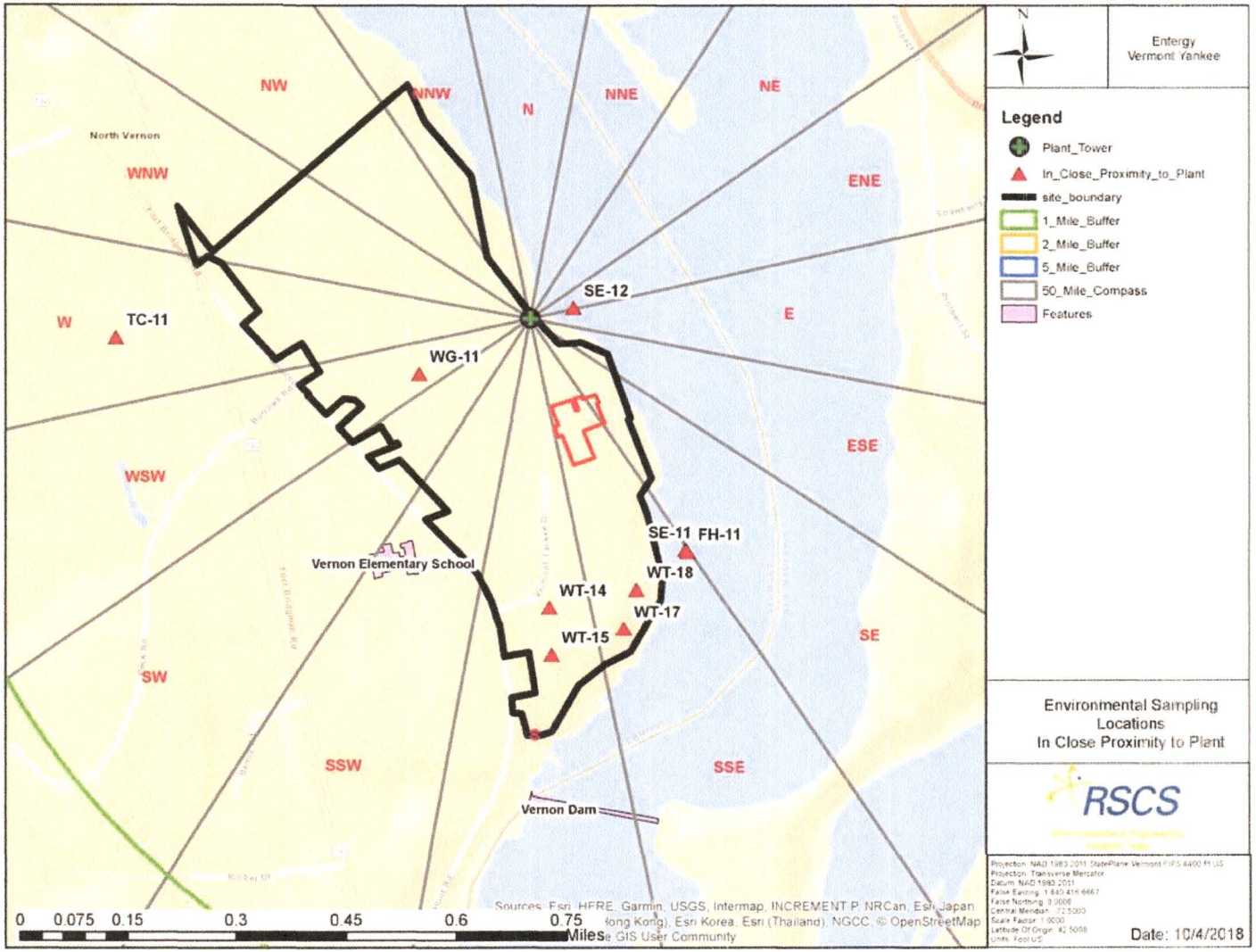

Figure 4.1 Environmental Sampling Locations in Close Proximity to the Plant

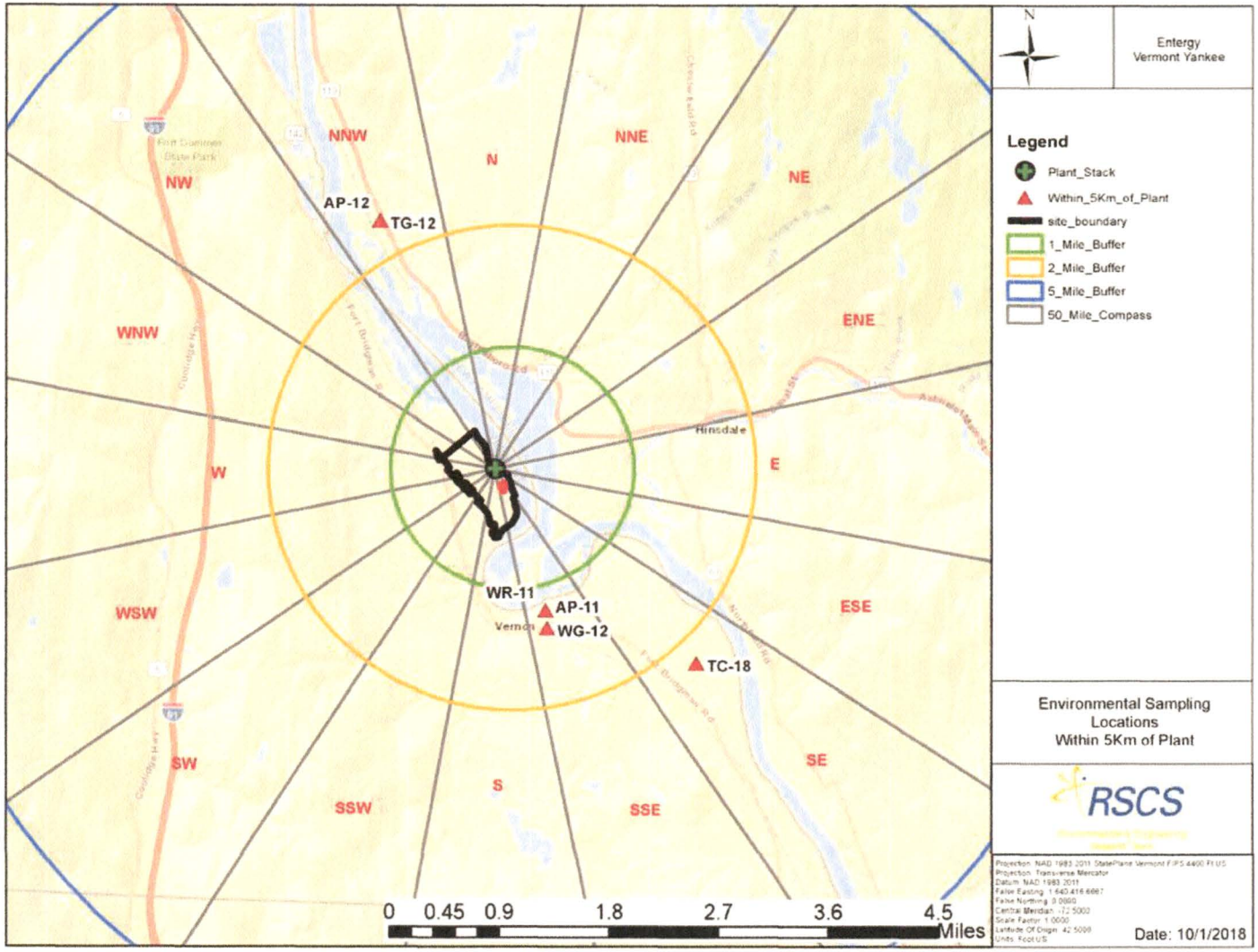

Figure 4.2 Environmental Sampling Locations Within 5 Km of Plant

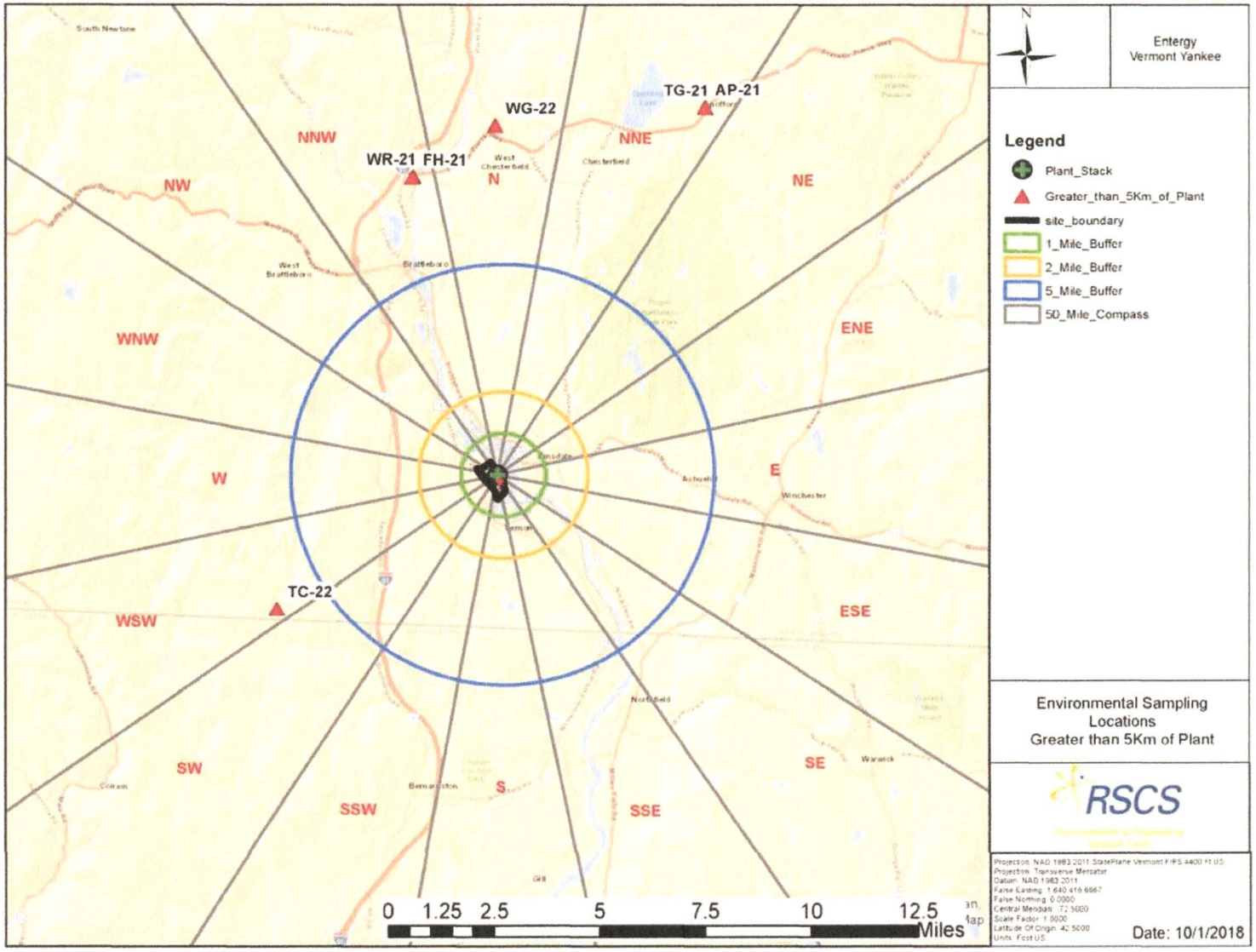

Figure 4.3 Environmental Sampling Locations Greater than 5 Km from Plant

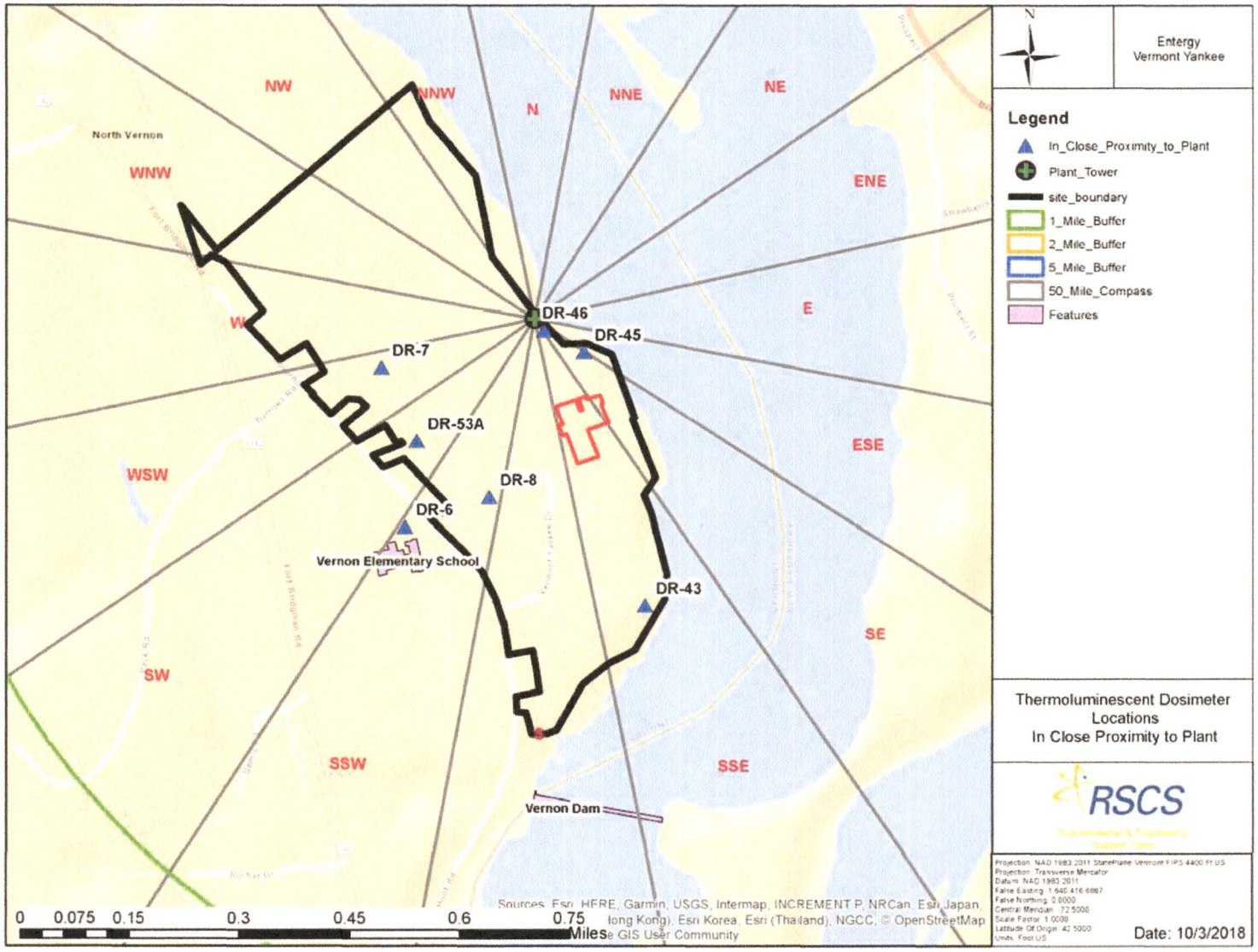

Figure 4.4 TLD Locations in Close Proximity to Plant

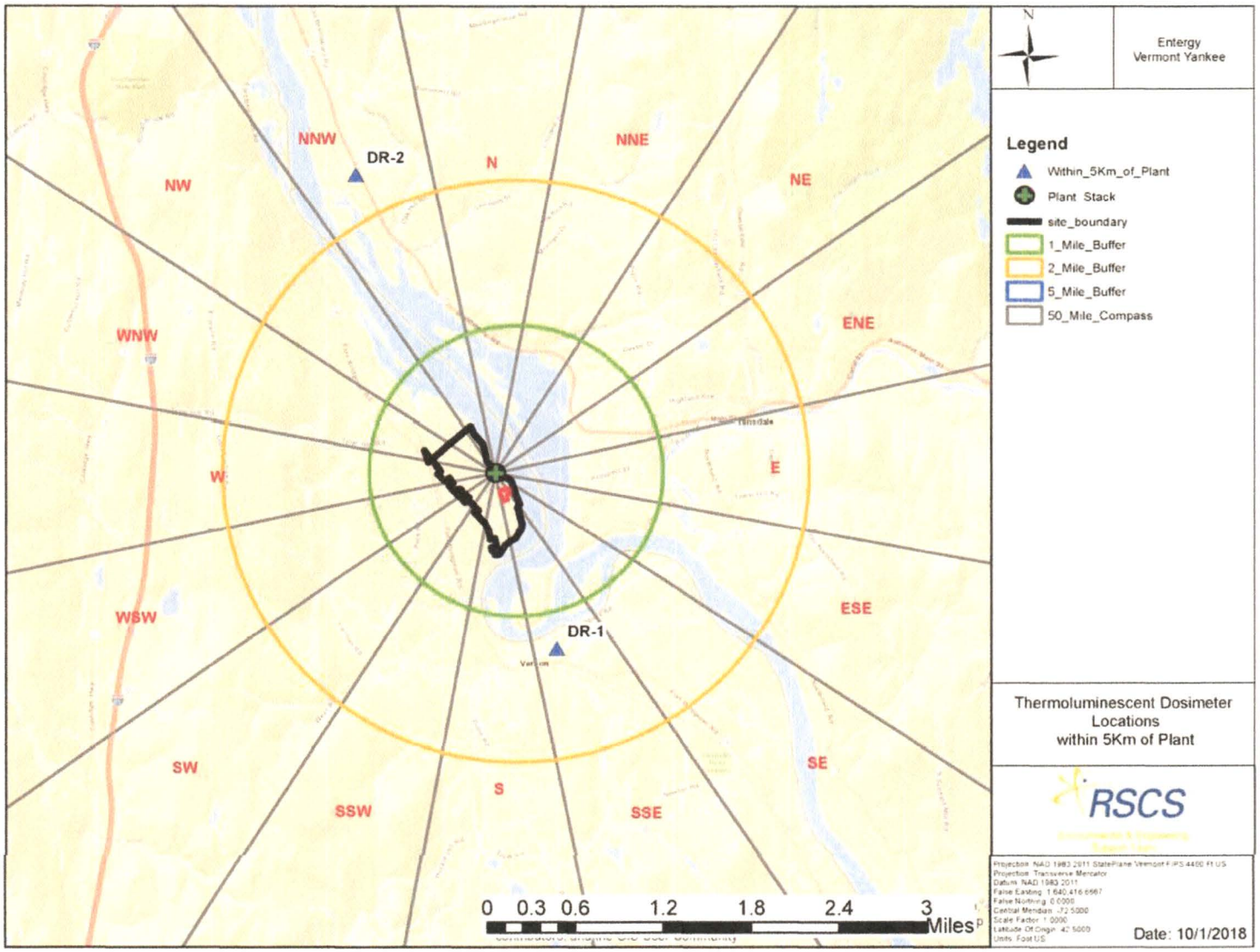

Figure 4.5 TLD Locations Within 5 Km of Plant

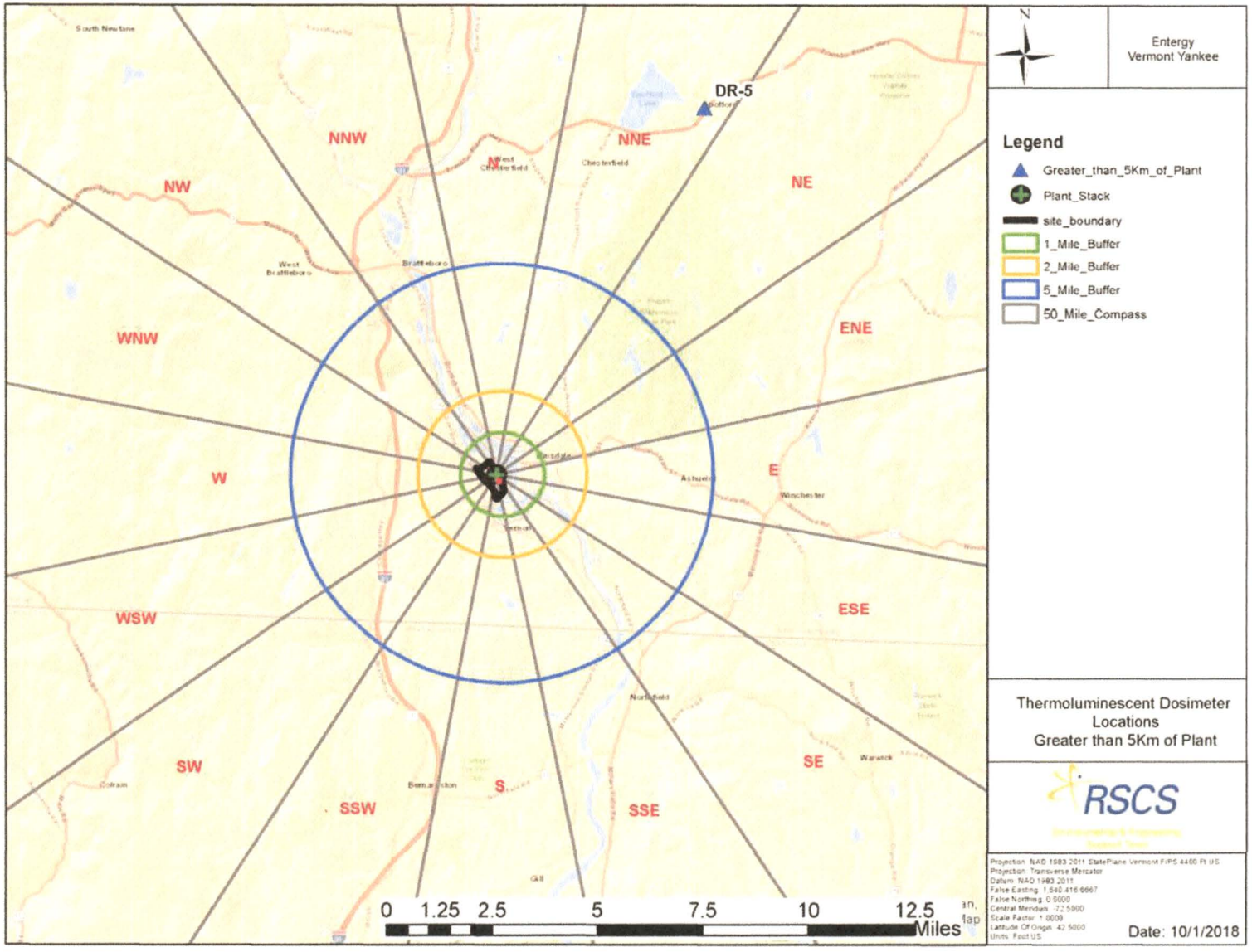

Figure 4.6 TLD Locations Greater Than 5 Km from Plant

5. RADIOLOGICAL DATA SUMMARY TABLES

This section summarizes the analytical results of the environmental samples that were collected during 2018. 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 2018, Vermont Yankee contracted with one laboratory for primary analyses of the environmental samples. A second laboratory was available, if needed, to cross-check the first laboratory for selected samples and to analyze other samples for hard-to-detect radionuclides (such as Strontium-89 and 90).

The left-most column of Table 5.1 contains the radionuclide of interest, the total number of analyses for that radionuclide in 2018 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 2016 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.

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Table 5.1:

Sample Medium:	Air Particulate (AP)
Sample Medium:	River Water (WR)
Sample Medium:	Ground Water (WG)
Sample Medium:	Sediment (SE)
Sample Medium:	Test Well (WT)
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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2018		
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
AIR PARTICULATES (PCI/M^3)	GR-B	138	0.01	0.0136 (92/92) (0.0044/ 0.0250)	0.0134 (46/46) (0.0054/ 0.0242)	0.0138 (46/46) (0.0067/ 0.0240)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	GAMMA	12						
	BE-7		N/A	0.1158 (8/8) (0.0744/ 0.1812)	0.1053 (4/4) (0.0805/ 0.1280)	0.1193 (4/4) (0.0744/ 0.1812)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	K-40		N/A	0.0293 (0/8) (< 0.0122/< 0.0463)	0.0307 (0/4) (< 0.0165/< 0.0425)	0.0308 (0/4) (< 0.0196/< 0.0463)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	CS-134		0.05	0.0021 (0/8) (< 0.0011/< 0.0031)	0.0024 (0/4) (< 0.0010/< 0.0032)	0.0024 (0/4) (< 0.0010/< 0.0032)	21 CONTROL SPOFFORD LAKE (9) 16.4 KM NNE OF SITE	0
	CS-137		0.06	0.0020 (0/8) (< 0.0013/< 0.0030)	0.0021 (0/4) (< 0.0010/< 0.0030)	0.0021 (0/4) (< 0.0010/< 0.0030)	21 CONTROL SPOFFORD LAKE (9) 16.4 KM NNE OF SITE	0
	RA-226		N/A	0.0339 (0/8) (< 0.0139/< 0.0506)	0.0398 (0/4) (< 0.0234/< 0.0583)	0.0398 (0/4) (< 0.0234/< 0.0583)	21 CONTROL SPOFFORD LAKE (9) 16.4 KM NNE OF SITE	0
	AC-228		N/A	0.0083 (0/8) (< 0.0059/< 0.0111)	0.0097 (0/4) (< 0.0058/< 0.0123)	0.0097 (0/4) (< 0.0058/< 0.0123)	21 CONTROL SPOFFORD LAKE (9) 16.4 KM NNE OF SITE	0
	TH-228		N/A	0.0031 (0/8) (< 0.0015/< 0.0043)	0.0036 (0/4) (< 0.0021/< 0.0050)	0.0036 (0/4) (< 0.0021/< 0.0050)	21 CONTROL SPOFFORD LAKE (9) 16.4 KM NNE 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2018		
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
RIVER WATER (PCI/LITER)	GR-B	24	4	1.788 (3/12) (< 1.240/ 2.380)	1.621 (0/12) (< 1.240/< 1.860)	1.788 (3/12) (< 1.240/ 2.380)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KM SSE OF SITE	0
	H-3	24	2000	636 (0/12) (<526/<716)	636 (0/12) (<542/<710)	636 (0/12) (<542/<710)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	GAMMA	24						
	MN-54		15	2.959 (0/12) (< 1.346/< 4.090)	2.957 (0/12) (< 1.403/< 4.461)	2.959 (0/12) (< 1.346/< 4.090)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KM SSE OF SITE	0
	CO-58		N/A	3.081 (0/12) (< 1.533/< 4.022)	3.193 (0/12) (< 1.627/< 4.241)	3.193 (0/12) (< 1.627/< 4.241)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	FE-59		N/A	7.680 (0/12) (< 3.581/<10.06)	7.421 (0/12) (< 3.558/< 9.674)	7.680 (0/12) (< 3.581/<10.06)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KM SSE OF SITE	0
	CO-60		15	3.246 (0/12) (< 1.317/< 5.364)	3.086 (0/12) (< 1.411/< 4.332)	3.246 (0/12) (< 1.317/< 5.364)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KM SSE OF SITE	0
	ZN-65		30	5.691 (0/12) (< 2.713/< 7.758)	6.068 (0/12) (< 3.039/< 9.224)	6.068 (0/12) (< 3.039/< 9.224)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	ZR-95		15	5.489 (0/12) (< 2.776/< 7.058)	5.953 (0/12) (< 2.886/< 7.445)	5.953 (0/12) (< 2.886/< 7.445)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	I-131		N/A	34.361 (0/12) (< 5.480/<228.5)	28.264 (0/12) (< 4.428/<174.5)	34.361 (0/12) (< 5.480/<228.5)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KM SSE 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2018		
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
RIVER WATER (cont'd) (PCI/LITER)	CS-134		15	2.771 (0/12) (< 1.224/< 3.858)	2.932 (0/12) (< 1.290/< 4.210)	2.932 (0/12) (< 1.290/< 4.210)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	CS-137		18	3.084 (0/12) (< 1.342/< 4.790)	3.182 (0/12) (< 1.301/< 4.705)	3.182 (0/12) (< 1.301/< 4.705)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	BA/LA-140		N/A	10.978 (0/12) (< 5.231/<37.43)	10.343 (0/12) (< 3.118/<35.72)	10.978 (0/12) (< 5.231/<37.43)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KM SSE OF SITE	0
	RA-226		N/A	73.397 (0/12) (<36.01/<116.3)	78.487 (1/12) (<28.35/<109.7)	78.487 (1/12) (<28.35/<109.7)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
GROUND WATER (PCI/LITER)	GR-B	12	4	4.555 (8/8) (2.340/ 7.870)	2.058 (2/4) (< 1.370/ 2.970)	5.220 (4/4) (3.210/ 7.870)	12 INDICATOR VERNON GREEN WELL 2.1 KM SSE OF SITE	0
	H-3	12	2000	626 (0/8) (<567/<710)	622 (0/4) (<571/<708)	627 (0/4) (<569/<704)	11 INDICATOR MAIN PLANT WELL 0.2 KM ON SITE	0
	GAMMA	12						
	MN-54		15	2.455 (0/8) (< 0.678/< 3.978)	2.159 (0/4) (< 0.692/< 3.288)	2.459 (0/4) (< 0.678/< 3.759)	11 INDICATOR MAIN PLANT WELL 0.2 KM ON SITE	0
	CO-58		N/A	2.727 (0/8) (< 0.744/< 4.076)	2.483 (0/4) (< 0.741/< 3.431)	2.848 (0/4) (< 0.759/< 4.076)	11 INDICATOR MAIN PLANT WELL 0.2 KM ON SITE	0
	FE-59		N/A	6.355 (0/8) (< 1.239/< 9.216)	5.881 (0/4) (< 1.332/< 8.274)	6.384 (0/4) (< 1.244/< 8.605)	11 INDICATOR MAIN PLANT WELL 0.2 KM 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER: 50-271**
Location of Facility: VERNON, VT **REPORTING PERIOD: 2018**

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	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
GROUND WATER (cont'd) (PCI/LITER)	CO-60		15	2.468 (0/8) (< 0.624/< 4.158)	2.290 (0/4) (< 0.710/< 3.571)	2.638 (0/4) (< 1.160/< 4.158)	12 INDICATOR VERNON GREEN WELL 2.1 KM SSE OF SITE	0
	ZN-65		30	4.692 (0/8) (< 1.252/< 7.823)	4.291 (0/4) (< 1.229/< 6.230)	4.698 (0/4) (< 1.479/< 7.823)	12 INDICATOR VERNON GREEN WELL 2.1 KM SSE OF SITE	0
	ZR-95		15	4.895 (0/8) (< 1.177/< 7.299)	4.632 (0/4) (< 1.144/< 6.891)	5.082 (0/4) (< 1.177/< 7.299)	11 INDICATOR MAIN PLANT WELL 0.2 KM ON SITE	0
	CS-134		15	2.211 (0/8) (< 0.660/< 3.356)	1.954 (0/4) (< 0.656/< 2.808)	2.259 (0/4) (< 0.660/< 3.356)	11 INDICATOR MAIN PLANT WELL 0.2 KM ON SITE	0
	CS-137		18	2.507 (0/8) (< 0.663/< 4.253)	2.197 (0/4) (< 0.736/< 3.186)	2.550 (0/4) (< 0.928/< 4.253)	12 INDICATOR VERNON GREEN WELL 2.1 KM SSE OF SITE	0
	BA/LA-140		N/A	14.503 (0/8) (< 1.310/<37.15)	12.318 (0/4) (< 1.153/<21.96)	15.448 (0/4) (< 1.380/<37.15)	12 INDICATOR VERNON GREEN WELL 2.1 KM SSE OF SITE	0
	RA-226		N/A	55.124 (0/8) (<17.77/<79.16)	58.323 (0/4) (<15.86/<87.9)	58.323 (0/4) (<15.86/<87.9)	22 CONTROL COPELAND WELL 13.7 KM N OF SITE	0
SEDIMENT (PCI/KG DRY)	GAMMA	36						
	BE-7		N/A	750.19 (1/30) (<309.2/1838)	750.78 (1/6) (<485.7/1136)	1199.65 (1/2) (<561.3/1838)	17 INDICATOR N. STORM DRAIN OUTFALL T-1 0.1 KM E OF SITE	0
	K-40		N/A	18916.73 (30/30) (8478/29220)	17400 (6/6) (10540/25100)	26000 (2/2) (22780/29220)	13 INDICATOR N. STORM DRAIN OUTFALL S-2 0.1 KM E 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2018		
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
SEDIMENT (cont'd) (PCI/KG DRY)	MN-54		N/A	73.53 (0/30) (<37.28/<91.3)	70.05 (0/6) (<50.86/<91.07)	84.71 (0/2) (<78.35/<91.07)	24 CONTROL N. STORM DRAIN OUTFALL U-3 0.1 KM E OF SITE	0
	CO-60		N/A	73.57 (0/30) (<42.48/<99.33)	61.37 (0/6) (<42.03/<74.25)	97.7 (0/2) (<96.07/<99.33)	19 INDICATOR N. STORM DRAIN OUTFALL T-3 0.1 KM E OF SITE	0
	ZN-65		N/A	160.65 (0/30) (<97.52/<199.7)	146.25 (0/6) (<116/<183.8)	192.55 (0/2) (<185.4/<199.7)	19 INDICATOR N. STORM DRAIN OUTFALL T-3 0.1 KM E OF SITE	0
	NB-95		N/A	91.09 (0/30) (<44.04/<117.2)	81.37 (0/6) (<55.18/<100.7)	101.7 (0/2) (<100.7/<102.7)	29 INDICATOR N. STORM DRAIN OUTFALL V-3 0.1 KM E OF SITE	0
	CS-134		150	64.91 (0/30) (<38.23/<73.84)	60.35 (0/6) (<50.41/<68.76)	70.15 (0/2) (<69.6/<70.7)	11 INDICATOR DISCHARGE (3-4) 0.6 KM SSE OF SITE	0
	CS-137		180	102.28 (12/30) (<46.49/224.6)	79.68 (1/6) (<57.96/131)	159.75 (2/2) (124.7/194.8)	19 INDICATOR N. STORM DRAIN OUTFALL T-3 0.1 KM E OF SITE	0
	BA/LA-140		N/A	228.02 (0/30) (<67.09/<514.6)	203.22 (0/6) (<108.2/<297.7)	369.25 (0/2) (<223.9/<514.6)	13 INDICATOR N. STORM DRAIN OUTFALL S-2 0.1 KM E OF SITE	0
	RA-226		N/A	2393.87 (21/30) (<1195/4390)	2177.17 (3/6) (<1111/3787)	3568 (2/2) (2746/4390)	13 INDICATOR N. STORM DRAIN OUTFALL S-2 0.1 KM E OF SITE	0
	AC-228		N/A	2065.48 (22/30) (<234/4421)	2284.55 (5/6) (<177.6/4040)	3465 (2/2) (2890/4040)	22 CONTROL N. STORM DRAIN OUTFALL U-1 0.1 KM E 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER: 50-271**
Location of Facility: VERNON, VT **REPORTING PERIOD: 2018**

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	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
SEDIMENT (cont'd) (PCI/KG DRY)	TH-228		N/A	1457.83 (30/30) (526.3/2027)	1275.47 (6/6) (605.4/1847)	1829 (2/2) (1740/1918)	13 INDICATOR N. STORM DRAIN OUTFALL S-2 0.1 KM E OF SITE	0
	TH-232		N/A	1221.18 (29/30) (<252/1718)	1191.68 (6/6) (589/1984)	1605 (2/2) (1226/1984)	24 CONTROL NORTH STORM DRAIN OUTFALL U-3 0.1 KM E OF SITE	0
	U-238		N/A	8041.87 (0/30) (<4048/<10770)	7591.33 (0/6) (<6264/<9777)	9447 (0/2) (<8124/<10770)	11 INDICATOR DISCHARGE (3-4) 0.6 KM SSE OF SITE	0
TEST WELLS (PCI/LITER) (Septage Spreading Field)	GR-B	16	4	5.5 (16/16) (2.7/ 9.3)	N/A	6.8 (4/4) (4.4/ 9.3)	14 INDICATOR TEST WELL 201 ON SITE	0
	H-3	16	2000	589 (0/16) (<462/<716)	N/A	616 (0/4) (<544/<716)	14 INDICATOR TEST WELL 201 ON SITE	0
	GAMMA	16						
	K-40		N/A	44.4 (0/16) (<14.7/<78.9)	N/A	53.9 (0/4) (<16.9/<78.9)	14 INDICATOR TEST WELL 201 ON SITE	0
	MN-54		15	3.0 (0/16) (< 1.8/< 4.1)	N/A	3.1 (0/4) (< 2.1/< 4.1)	17 INDICATOR TEST WELL 203 ON SITE	0
	CO-58		N/A	3.5 (0/16) (< 2.6/< 4.2)	N/A	3.6 (0/4) (< 3.1/< 4.2)	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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER: 50-271**
Location of Facility: VERNON, VT **REPORTING PERIOD: 2018**

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	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
TEST WELLS (cont'd) (PCI/LITER) (Septage Spreading Field)	FE-59		N/A	8.8 (0/16) (< 6.8/< 9.8)	N/A	9.2 (0/4) (< 8.8/< 9.7)	14 INDICATOR TEST WELL 201 ON SITE	0
	CO-60		15	3.2 (0/16) (< 1.6/< 4.8)	N/A	3.3 (0/4) (< 1.6/< 4.5)	14 INDICATOR TEST WELL 201 ON SITE	0
	NB-95		N/A	3.9 (0/16) (< 2.7/< 4.9)	N/A	4.1 (0/4) (< 3.4/< 4.9)	14 INDICATOR TEST WELL 201 ON SITE	0
	I-131		N/A	128.4 (0/16) (< 7.7/<455)	N/A	137.4 (0/4) (< 9.1/<455)	17 INDICATOR TEST WELL 203 ON SITE	0
	CS-134		15	2.9 (0/16) (< 1.7/< 4.1)	N/A	3.0 (0/4) (< 1.9/< 4.1)	18 INDICATOR TEST WELL 204 ON SITE	0
	CS-137		18	3.1 (0/16) (< 1.8/< 4.3)	N/A	3.2 (0/4) (< 1.9/< 4.1)	14 INDICATOR TEST WELL 201 ON SITE	0
	BA/LA-140		N/A	25.6 (0/16) (< 6.1/<66.4)	N/A	26 (0/4) (< 6.5/<66.4)	18 INDICATOR TEST WELL 204 ON SITE	0
SILAGE (PCI/KG WET)	GAMMA	12		830.03	302.33	1059.53	11 INDICATOR	0
	BE-7		N/A	(3/8) (<193.1/3022)	(2/4) (<263.1/396.9)	(2/4) (<193.1/3022)	MILLER FARM 0.8 KM W OF SITE	
	K-40		N/A	4546.25 (8/8) (2314/8690)	11742.5 (4/4) (8087/19350)	11742.5 (4/4) (8087/19350)	22 CONTROL FRANKLIN FARM 9.7 KM WSW 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: REPORTING PERIOD:		50-271 2018		
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
SILAGE (cont'd) (PCI/KG WET)	CS-134		60	21.86 (0/8) (<17.78/<27)	23.04 (0/4) (<14.61/<29.66)	23.1 (0/4) (<18.74/<26.92)	18 INDICATOR BLODGETT FARM 3.6 KM SE OF SITE	0
	CS-137		60	24.17 (0/8) (<18.49/<32.39)	27.71 (2/4) (<16.85/37.6)	27.71 (2/4) (<16.85/37.6)	22 CONTROL FRANKLIN FARM 9.7 KM WSW OF SITE	0
	AC-228		N/A	108.47 (0/8) (<85.6/<129.5)	114.71 (0/4) (<67.33/<156.5)	114.71 (0/4) (<67.33/<156.5)	22 CONTROL FRANKLIN FARM 9.7 KM WSW OF SITE	0
	TH-228		N/A	44.95 (0/8) (<36.55/<54.84)	45.14 (1/4) (<23.91/<67.66)	47.46 (0/4) (<36.55/<54.84)	11 INDICATOR MILLER FARM 0.8 KM W OF SITE	0
MIXED GRASS (PCI/KG WET)	GAMMA	9						
	BE-7		N/A	2595.48 (6/6) (252.5/5161)	1771.03 (2/3) (<172.5/4294)	3032.5 (3/3) (252.5/5161)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	K-40		N/A	3371.67 (6/6) (2106/4230)	5064 (3/3) (4739/5439)	5064 (3/3) (4739/5439)	21 CONTROL SPOFFORD LAKE (9) 16.4 KM NNE OF SITE	0
	I-131		N/A	43.11 (0/6) (<11.66/<70.28)	34.89 (0/3) (<24.35/<52.39)	48.8 (0/3) (<26.66/<70.28)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	CS-134		60	23.41 (0/6) (< 9.98/<29.67)	22.21 (0/3) (<18.27/<29.73)	26.35 (0/3) (<20.66/<29.31)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	CS-137		60	26.79 (0/6) (< 8.10/<36.79)	25.49 (0/3) (<21.04/<33.96)	32.57 (0/3) (<26.82/<36.79)	12 INDICATOR N. HINSDALE NH 3.6 KM 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2018		
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
MIXED GRASS (cont'd) (PCI/KG WET)	RA-226		N/A	682.98 (1/6) (<211.6/1318)	504.57 (0/3) (<416.4/<680.6)	894.1 (1/3) (<536.1/1318)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	AC-228		N/A	116.76 (0/6) (<45.75/<155.4)	96.78 (0/3) (<81.3/<118.1)	142.03 (0/3) (<121.5/<155.4)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
	TH-228		N/A	44.48 (0/6) (<15.22/<63.06)	47.31 (1/3) (<31.33/<59.51)	54.27 (0/3) (<36.84/<63.06)	12 INDICATOR N. HINSDALE NH 3.6 KM NNW OF SITE	0
FISH (PCI/KG WET)	GAMMA K-40	8	N/A	3183.75 (4/4) (2475/4626)	3141 (4/4) (2720/3451)	3183.75 (4/4) (2475/4626)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	MN-54		130	44.263 (0/4) (<38.78/<48.91)	39.823 (0/4) (<33.45/<48.23)	44.263 (0/4) (<38.78/<48.91)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	CO-58		N/A	54.583 (0/4) (<52.05/<57.1)	51.568 (0/4) (<41.08/<55.88)	54.583 (0/4) (<52.05/<57.1)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	FE-59		N/A	127.825 (0/4) (<127.1/<129.1)	112.063 (0/4) (<94.25/<129.1)	127.825 (0/4) (<127.1/<129.1)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	CO-60		130	48.895 (0/4) (<37.27/<58.11)	38.685 (0/4) (<34.44/<42.57)	48.895 (0/4) (<37.27/<58.11)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	ZN-65		260	95.83 (0/4) (<83.04/<108.1)	91.225 (0/4) (<78.4/<99.4)	95.83 (0/4) (<83.04/<108.1)	11 INDICATOR VERNON POND 0.6 KM SSE 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: REPORTING PERIOD: INDICATOR LOCATIONS	CONTROL LOCATION	50-271 2018 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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
FISH (cont'd) (PCI/KG WET)	CS-134		130	39.283 (0/4) (<34.09/<46.67)	38.853 (0/4) (<35.45/<44.95)	39.283 (0/4) (<34.09/<46.67)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	CS-137		150	45.185 (0/4) (<34.96/<49.33)	42.7 (0/4) (<36.94/<46.78)	45.185 (0/4) (<34.96/<49.33)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	H-3	4	0.2	74.65 (0/2) (<51.1/<98.2)	73.35 (0/2) (<52.7/<94.0)	74.65 (0/2) (<51.1/<98.2)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	AM-241	8	N/A	0.975 (0/4) (< 0.202/< 1.625)	1.536 (0/4) (< 0.410/< 3.837)	1.536 (0/4) (< 0.410/< 3.837)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	CM-242	8	N/A	0.548 (0/4) (< 0.372/< 0.900)	0.335 (0/4) (< 0.224/< 0.408)	0.548 (0/4) (< 0.372/< 0.900)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	CM-243/244	8	N/A	1.033 (0/4) (< 0.372/< 1.334)	1.268 (0/4) (< 0.590/< 3.068)	1.268 (0/4) (< 0.590/< 3.068)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	FE-55	8	N/A	1486.65 (0/4) (<641.6/<1997)	1187.475 (0/4) (<952.9/<1665)	1486.65 (0/4) (<641.6/<1997)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	NI-63	8	N/A	158.7 (0/4) (<66.3/<376)	187.75 (0/4) (<57.6/<364)	187.75 (0/4) (<57.6/<364)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	PU-238	8	N/A	1.113 (0/4) (< 0.539/< 1.516)	1.028 (0/4) (< 0.228/< 1.761)	1.113 (0/4) (< 0.539/< 1.516)	11 INDICATOR VERNON POND 0.6 KM SSE 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, 2018

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2018				
				INDICATOR LOCATIONS	CONTROL LOCATION	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	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
FISH (cont'd) (PCI/KG WET)	PU-239/240	8	N/A	1.456 (0/4) (< 0.539/< 3.922)	1.072 (0/4) (< 0.714/< 1.525)	1.456 (0/4) (< 0.539/< 3.922)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	PU-241	8	N/A	177.925 (0/4) (<87.7/<341)	213 (0/4) (<123/<329)	213 (0/4) (<123/<329)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
	PU-242	8	N/A	2.197 (0/4) (< 0.278/< 6.775)	0.964 (0/4) (< 0.603/< 1.302)	2.197 (0/4) (< 0.278/< 6.775)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	SR-89	8	N/A	194.4 (0/4) (<27.3/<378)	166.2 (0/4) (<27.5/<371)	194.4 (0/4) (<27.3/<378)	11 INDICATOR VERNON POND 0.6 KM SSE OF SITE	0
	SR-90	8	60	22.968 (1/4) (< 9.670/<28.7)	30.618 (1/4) (< 8.570/57.4)	30.618 (1/4) (< 8.570/57.4)	21 CONTROL RT.9 BRIDGE 11.8 KM NNW OF SITE	0
DIRECT RADIATION (MILLI-ROENTGEN/QTR.)	TLD-QUARTERLY	84	N/A	7 (76/76) (5./11)	6 (8/8) (6/7)	10.2 (4/4) (10.2/10.6)	DR45 INDICATOR SITE BOUNDARY 0.12 KM NE OF SITE	0

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

TABLE 5.2

ENVIRONMENTAL TLD DATA SUMMARY
VERMONT YANKEE NUCLEAR POWER STATION, VERNON, VT
(JANUARY - DECEMBER 2018)

INNER RING TLD	OUTER RING TLD	OFFSITE STATION WITH HIGHEST MEAN	CONTROL TLDs
MEAN*	MEAN*	STA.NO./ MEAN*	MEAN*
RANGE*	RANGE*	RANGE*	RANGE*
(N0. MEASUREMENTS)**	(N0. MEASUREMENTS)**	(N0. MEASUREMENTS)**	(N0. MEASUREMENTS)**
6.50 ± 0.31	6.82 ± 0.29	*DR03* 7.02 ± 0.35	6.31 ± 0.27
5.86 to 7.36	6.13 to 7.19	6.54 to 7.36	5.73 to 6.97
12	4	4	8

SITE BOUNDARY TLD WITH HIGHEST MEAN	SITE BOUNDARY TLD
STA.NO./ MEAN*	MEAN*
RANGE*	RANGE *
(NO. MEASUREMENTS)**	(NO. MEASUREMENTS)**
DR45 10.24 ± 0.59	6.87 ± 0.35
10.00 to 10.57	5.42 to 10.57
4	60

* 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
2018
(Micro-R per Hour)

Sta.		1ST QUARTER			2ND QUARTER			3RD QUARTER			4TH QUARTER			ANNUAL AVE.
No.	Description	EXP.		S.D.	EXP.		S.D.	EXP.		S.D.	EXP.		S.D.	EXP.
DR-01	River Sta. No. 3.3	5.98	±	0.34	5.86	±	0.26	5.96	±	0.28	6.08	±	0.24	6.0
DR-02	N Hinsdale, NH	6.13	±	0.32	6.93	±	0.29	7.01	±	0.27	7.19	±	0.29	6.8
DR-03	Hinsdale Substation	6.54	±	0.34	7.18	±	0.29	6.98	±	0.28	7.36	±	0.38	7.0
DR-04	Northfield, MA	5.73	±	0.34	6.05	±	0.21	5.95	±	0.23	6.18	±	0.23	6.0
DR-05	Spofford Lake, NH	6.20	±	0.37	6.64	±	0.26	6.76	±	0.22	6.97	±	0.29	6.6
DR-06	Vernon School	5.94	±	0.35	6.67	±	0.39	6.67	±	0.26	6.80	±	0.35	6.5
DR-07	Site Boundary	6.02	±	0.32	6.66	±	0.26	6.72	±	0.24	7.06	±	0.28	6.6
DR-08	Site Boundary	6.30	±	0.38	6.63	±	0.22	6.55	±	0.21	6.67	±	0.31	6.5
DR-41	Site Boundary	6.41	±	0.35	6.67	±	0.34	6.61	±	0.31	6.86	±	0.25	6.6
DR-42	Site Boundary	5.94	±	0.54	6.44	±	0.35	6.71	±	0.27	7.04	±	0.34	6.5
DR-43	Site Boundary	6.25	±	0.36	6.74	±	0.30	6.68	±	0.26	6.96	±	0.28	6.7
DR-44	Site Boundary	6.04	±	0.32	6.12	±	0.33	6.36	±	0.26	6.21	±	0.36	6.2
DR-45	Site Boundary	10.00	±	0.76	10.04	±	0.63	10.35	±	0.39	10.57	±	0.56	10.2
DR-46	Site Boundary	6.57	±	0.36	6.75	±	0.27	6.91	±	0.37	6.88	±	0.25	6.8
DR-47	Site Boundary	6.91	±	0.44	7.48	±	0.37	7.45	±	0.27	7.72	±	0.42	7.4
DR-48	Site Boundary	5.42	±	0.28	6.36	±	0.39	6.16	±	0.21	6.44	±	0.33	6.1
DR-49	Site Boundary	5.85	±	0.37	6.34	±	0.29	6.07	±	0.26	6.59	±	0.44	6.2
DR-50	Governor Hunt House	6.10	±	0.42	6.48	±	0.29	6.62	±	0.29	6.73	±	0.34	6.5
DR-51	Site Boundary	5.96	±	0.33	7.01	±	0.26	6.87	±	0.30	7.29	±	0.30	6.8
DR-52	Site Boundary	6.24	±	0.39	7.10	±	0.32	6.83	±	0.27	6.80	±	0.31	6.7
DR-53	Site Boundary	6.62	±	0.44	7.28	±	0.35	7.45	±	0.37	7.48	±	0.41	7.2

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 2018, three 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 2018 were:

a) Environmental Air Sampling Station #12 (AP-12, located in North Hinsdale, New Hampshire) experienced a short power outage of approximately four hours during weekly sample collection ending on February 13th, 2018. The local utility was able to confirm a short (~4 hour) power interruption to this station occurred during week 7 (week ending February 13th) of 2018. This power interruption did not significantly affect total sample collection during the approximately 168 hour sample collection period. (CR-VTY-2018-00172)

b) Environmental Air Sampling Station #21 (AP-21, located in Spofford, New Hampshire) was discovered by the technician to have missed approximately 4.5 hours of sample collection time during the sample collection period ending on April 10th, 2018 (week 15-18). The station timer was short by four and one half hours of collection time as compared to clock time for the approximately 168 hour sampling period. The station was operating properly during and following the sample collection process on April 10th, 2018. Power line maintenance was suspected as the cause for the short power outage during the sample collection period. No further actions were taken. (CR-VTY-2018-00422).

c) Environmental Air Sampling Station #12 (AP-12, located in North Hinsdale, New Hampshire) experienced a short power outage of approximately 1.9 hours during weekly sample collection ending on August 14th, 2018 (week 33-18). Local thunderstorms were experienced in the area during the sample collection period and it is suspected that this short power interruption was a result of these storms. This power interruption did not significantly affect total sample collection during the approximately 168 hour sample collection period. (WT-WTVTY-2018-00009 CA-00005).

d) **Air sample station outages during 2018 are reflected in the air sample collection time percentages listed below.**

AP/CF #	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
11	98.9%	100.0%	100.0%	100.0%
12	98.7%	99.9%	99.9%	99.8%
21	98.8%	99.8%	99.9%	99.9%

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 2018, 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 2018, 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 2018.

Milk collection from Dunklee farm (Vern-Mont Farm in Vernon) commenced in April, 2010 at the request of the farm owner. After the shutdown of Vermont Yankee, sampling from this location was terminated in August 2015. All milk sampling was terminated by the implementation of ODCM Rev 37 in December 2016 due to the decay of radioiodines following shutdown.

6.5 Data Analysis by Media Type

The 2018 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 three 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 of the 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 fourth quarter, and the maximum concentration in the third 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 was one naturally-occurring gamma-emitting radionuclide detected on the air particulate filters during this reporting period. Be-7, a naturally-occurring cosmogenic radionuclide, was detected on all 12 filter sets analyzed.

6.5.1.2 Charcoal Cartridges (CF)

Charcoal cartridges are no longer analyzed as part of the Environmental Monitoring Program.

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. 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 three out of 12 indicator samples as would be expected due to naturally-occurring radionuclides in the water. Gross-beta was not detected in any of the 12 control samples. As seen in Figure 6.8, the mean concentration of the indicator locations was similar to the mean concentration at the control location in 2018.

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

Radium-226 a gamma-emitting radionuclide was detected one control sample with a concentration of 69.6 pCi/L.

6.5.2.2 Ground Water – Potable Drinking Water (WG)

Quarterly ground water (deep wells supplying drinking water to the plant and selected offsite locations) samples were collected from two indicator locations (only one is required by VYNPS ODCM) and one control location during 2018. In 1999, WG-14 (PSB Well) another on-site well location was added to the program. In July 2012, WG-15 (Southwest Well) was added to the ODCM as a quarterly sample location. Table 5.1 and Figure 6.9 show that gross-beta measurements were positive in all eight indicator samples and in two out of four control samples. The beta activity is due to naturally-occurring radionuclides in the water. The levels at all sampling locations were consistent with those detected in previous years. No

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 2018. 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 2018, 15 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 two 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 samples. Radium-226 (Ra-226) was detected in 24 of 36 samples. Actinium-228 (Ac-228) was detected in 27 of 36 samples. Thorium-228 (Th-228) was detected in all of the samples analyzed. Thorium-232 (Th-232) was detected in 35 of the 36 samples analyzed. Uranium-238 (U-238) was not detected in any of the 36 samples. Cesium-137 (Cs-137) was detected in 12 out of 30 of the indicator samples and one of the six 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. 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 2018. The test wells are summarized in Table 5.1 under the media category, Test Well (WT). In 2018, four samples were sampled quarterly 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 2.7 to 9.3 pCi/Liter. No gamma-emitting radionuclides were detected.

6.5.2.5 Storm Drain System

The presence of plant-generated 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 in the onsite storm drain system was routinely sampled throughout 2018 at the south storm drain. These samples are analyzed for tritium; no tritium was detected in any sample. Tritium was used as a marker and samples that had detectable levels of tritium would be analyzed for gamma emitters after tritium detection; no gamma analyses were performed on storm drain samples in 2018.

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 6.1 will be filed under the requirements of 10CFR50.75(g) and is presented here in response to ER_95-0704_04 commitments. Because of revisions in the security arrangements at the plant site, there was no water available for collection in Manholes 11H, 13 and 8 during 2018.

Table 6.1

Summary of Air Compressor Condensate and Manhole Water Tritium Concentrations*

Sample Location	No. Detected**	Mean*** (microcuries/ml)	Range (microcuries/ml)
Air Compressor Condensate	0/3	<1.7E-6	<1.7E-06 – 1.7E-06
Manhole 11H	0/0	No Sample Available	No Sample Available
Manhole 13	0/0	No Sample Available	No Sample Available
Manhole 8	0/0	No Sample Available	No Sample Available

* **Reported per ER_950704_04.**

** **The fraction of sample analyses yielding detectable measurements**

*** **Calculated from positive results**

6.5.2.7 Groundwater Monitoring Wells Samples Results (WS)

Leakage from primary system piping between the Augmented Off Gas (AOG) Building and the Turbine Building was identified early in 2010. A large pool of subsurface water became contaminated with Tritium as a result of this leak. A large number of new groundwater sample wells were installed and a significant effort was mounted to find the leak and fix it. Presently, mitigation efforts have resulted in the extraction of more than 300000 gallons of trititated water from this subsurface pool. Dose calculations

have been performed assuming that this underground plume of contaminated water is moving towards and into the Connecticut River. The dose impacts and other details of this event are provided in the year 2018 Annual Radioactive Effluent Release Report.

6.5.3 Ingestion Pathways

6.5.3.1 Milk (TM)

As a result of re-evaluation of source terms (and subsequent revision of the Vermont Yankee Offsite Dose Calculation Manual) which identified that radioiodine releases were no longer of measurable significance in plant releases, no milk samples were collected or analyzed during 2018.

6.5.3.2 Silage (TC)

A silage sample was collected from each of the three Land Use Census-identified farm locations during each quarter of 2018. Each of these was analyzed for gamma-emitting radionuclide. As expected with all biological media, naturally-occurring Be-7 was detected in five of 12 samples and K-40 was detected in all samples. Cs-137 was detected in two of the 12 samples analyzed.

6.5.3.3 Mixed Grass (TG)

Mixed grass samples were collected at each of the air sampling stations during three of the four quarters of 2018. As expected with all biological media, naturally-occurring Be-7 was detected in eight of the nine samples collected. Naturally-occurring K-40 was detected in all 9 samples. Cesium-137 was not detected 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 2018 for the VY REMP. Several species may be 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 eight samples (4 edible and 4 inedible). In addition to the analysis of edible portions, the inedible portions were also analyzed. These fish portions were also analyzed for H-3, Am-241, Cm-242, Cm-243/244, Fe-55, Ni-63, Pu-238, Pu-239/240, Pu-241, Pu-242, Sr-89 and Sr-90.

Strontium 90 was detected in two of the four inedible portions (bones, guts and skin are included in the 'inedible' portion). This is the eighth year in the VY REMP program that fish has been analyzed for Hard-to-Detects such as Strontium-90. The results were compared to studies done in the Hudson River by

New York State officials and it was concluded that the Strontium-90 detected is a result of weapons-testing era fallout to the environment and not from nuclear power plant releases.

As shown in Table 5.1, Cs-137 was not detected in this year's samples. It should be noted that the majority 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 2014 and previous years are typical of concentrations attributable to global nuclear weapons testing fallout.

6.5.4 Direct Radiation Pathway

Direct radiation was continuously measured at 29 locations surrounding the Vermont Yankee plant with the use of thermoluminescent dosimeters (TLDs).

The TLDs are collected every calendar quarter for readout at the environmental TLD 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 inner and outer ring TLD mean exposure rates were not significantly different in 2018. 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 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. 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. The same can be said for station DR-46, which has shown higher exposure rates in previous years.

Environmental Program Trend Graphs

2018 Radiological Environmental Operating Report
Vermont Yankee

Graphs:

Note: No year 2018 data was obtained from locations previously provided in "Deleted" graphs due to ODCM changes implemented in January, 2017 as a result of source term changes in the plant. These graphs may be viewed in the year 2016 Annual Radiological Environmental Operating Report (AREOR) for comparison purposes.

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

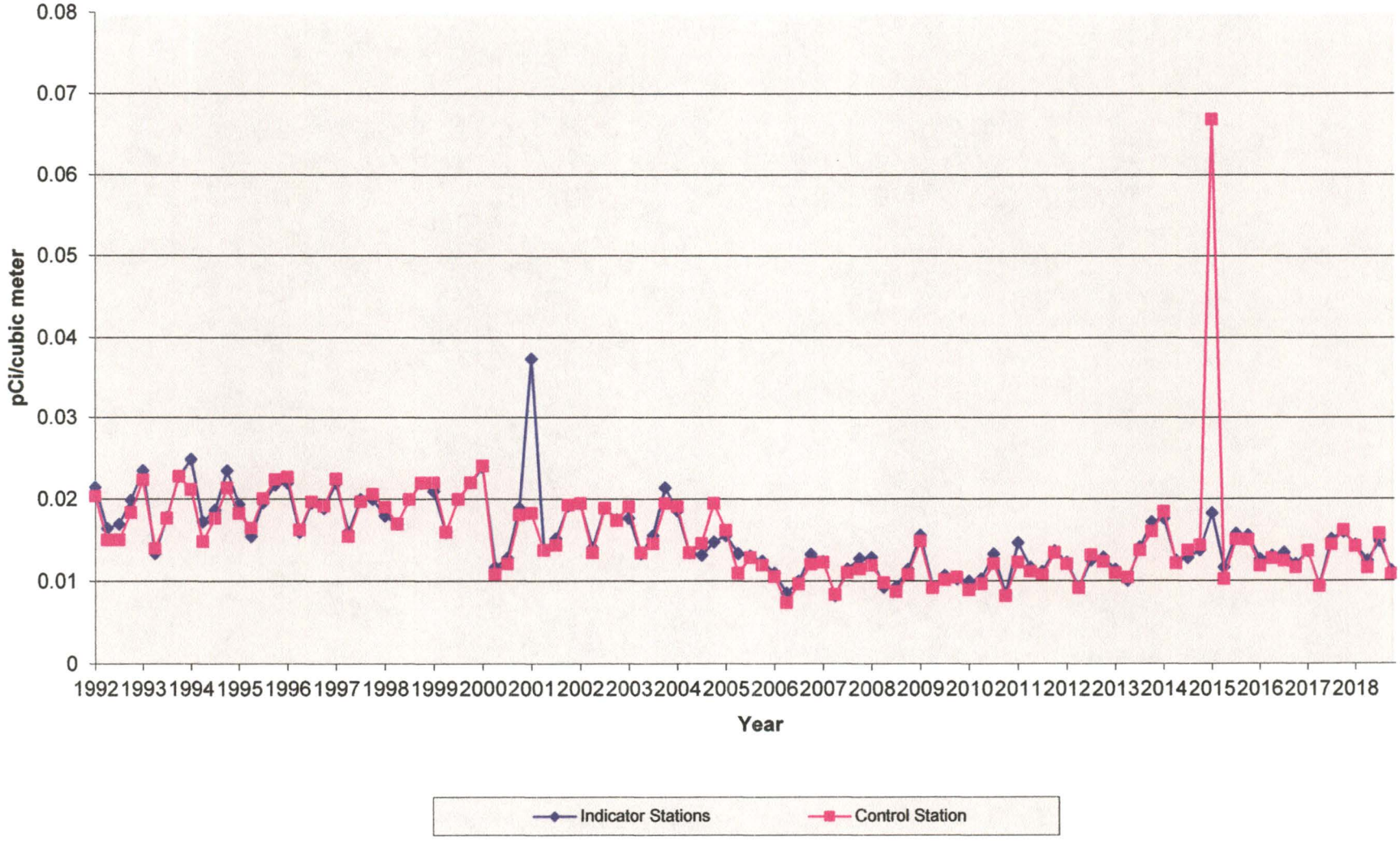


Figure 6.2 - Gross Beta Measurements on Air Particulate Filters

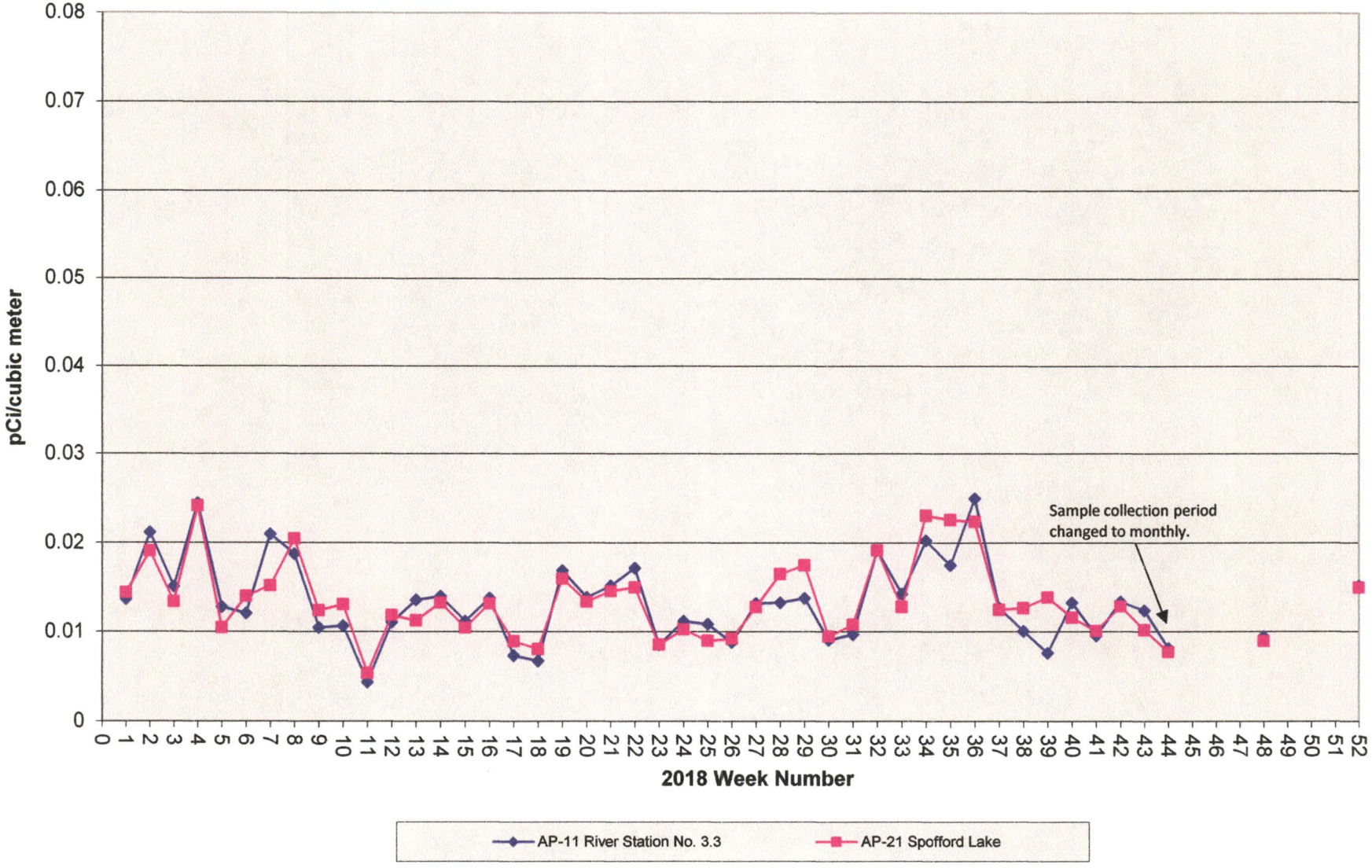


Figure 6.3 - Gross Beta Measurements on Air Particulate Filters

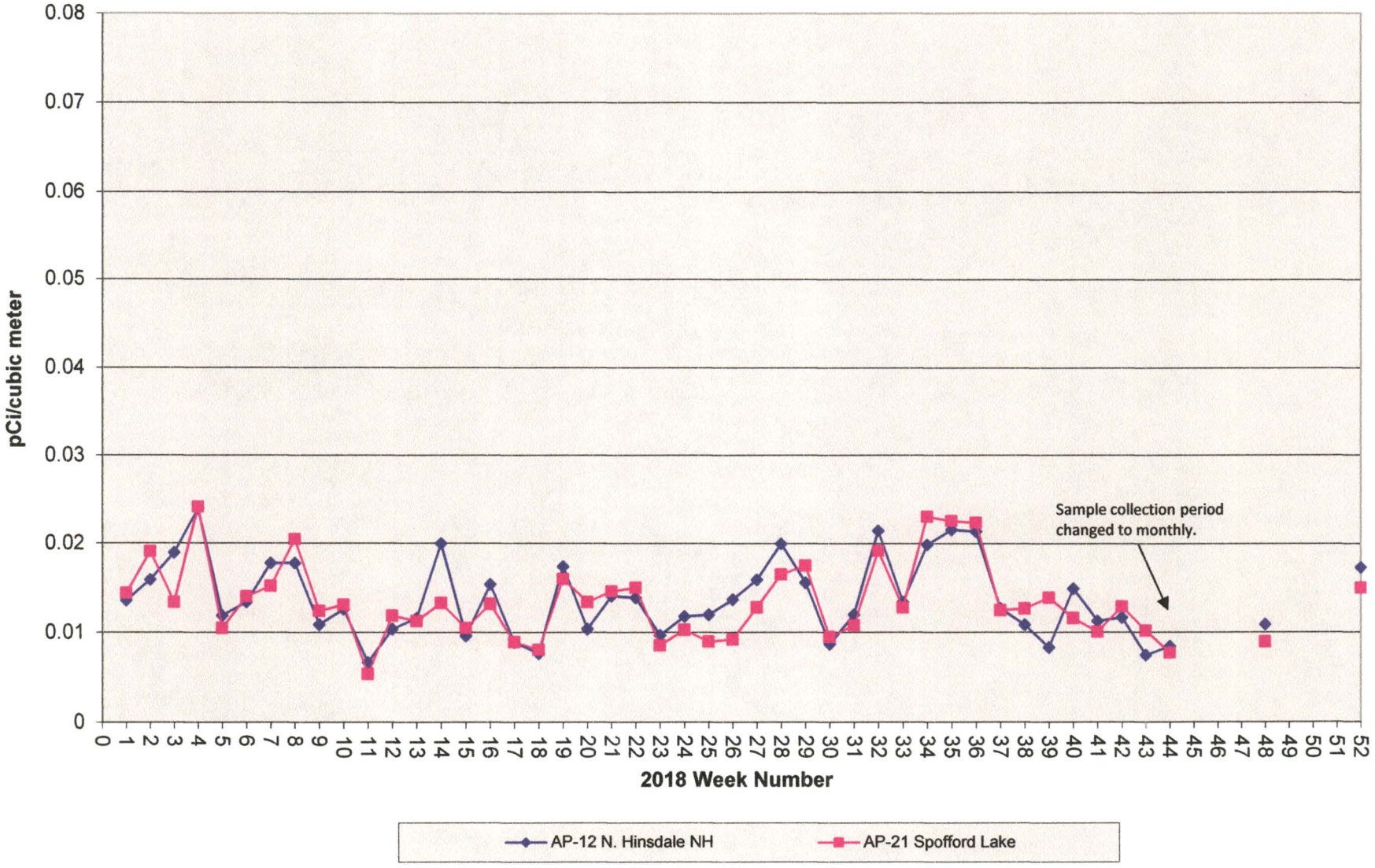


Figure 6.8 - Gross Beta Measurements on River Water Semi-Annual Average Concentration

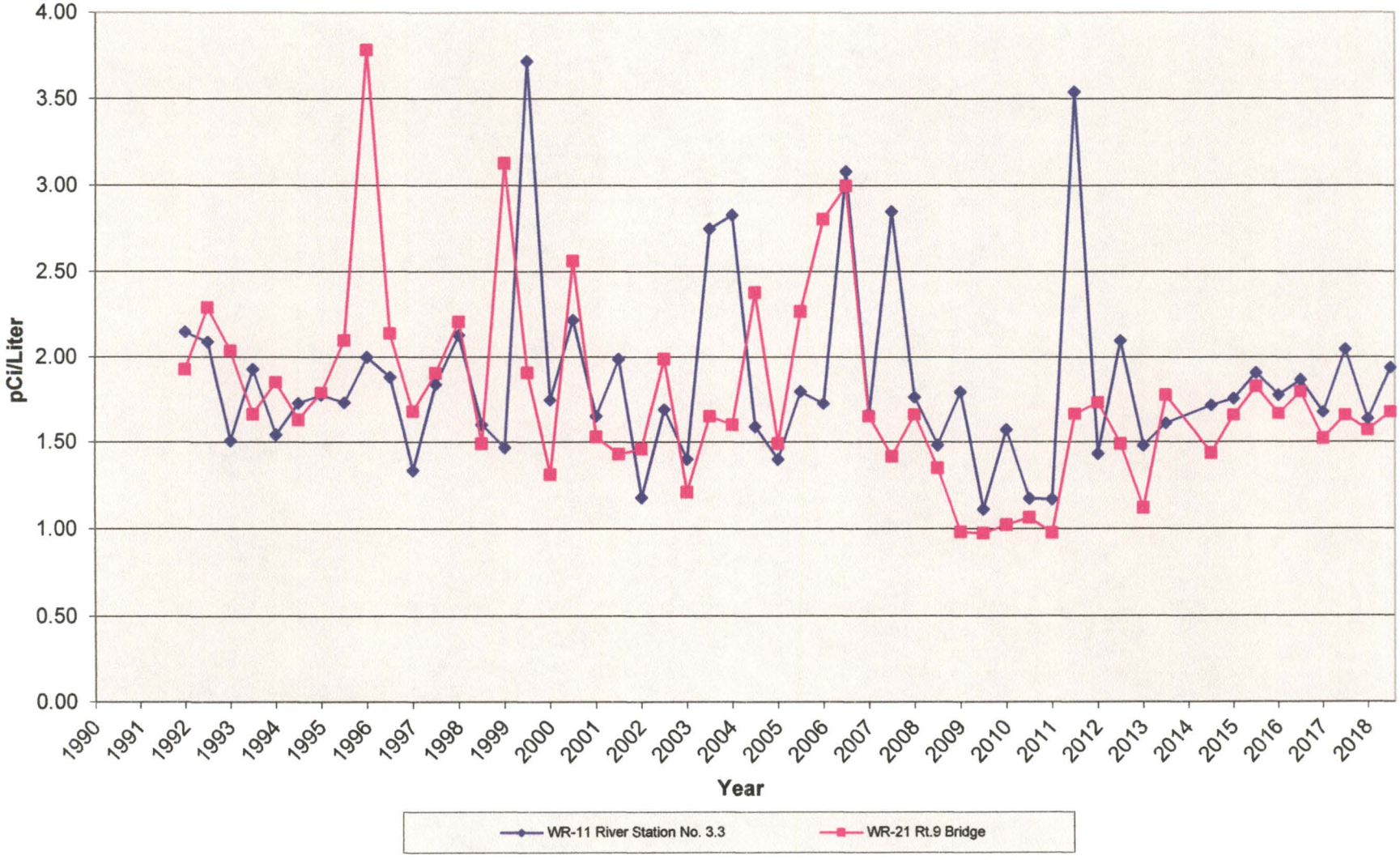


Figure 6.9 - Gross Beta Measurements on Ground Water Semi-Annual Average Concentrations

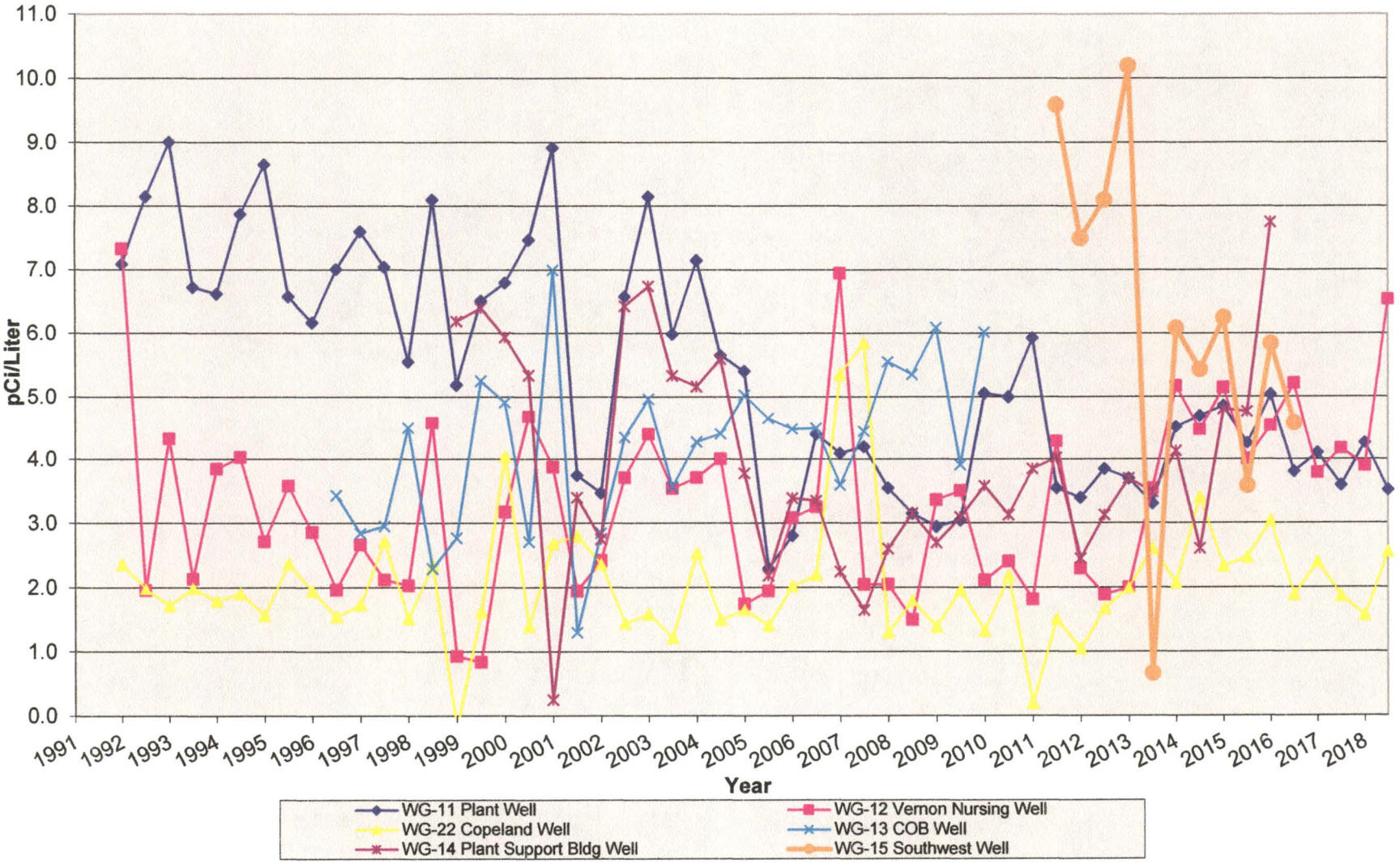
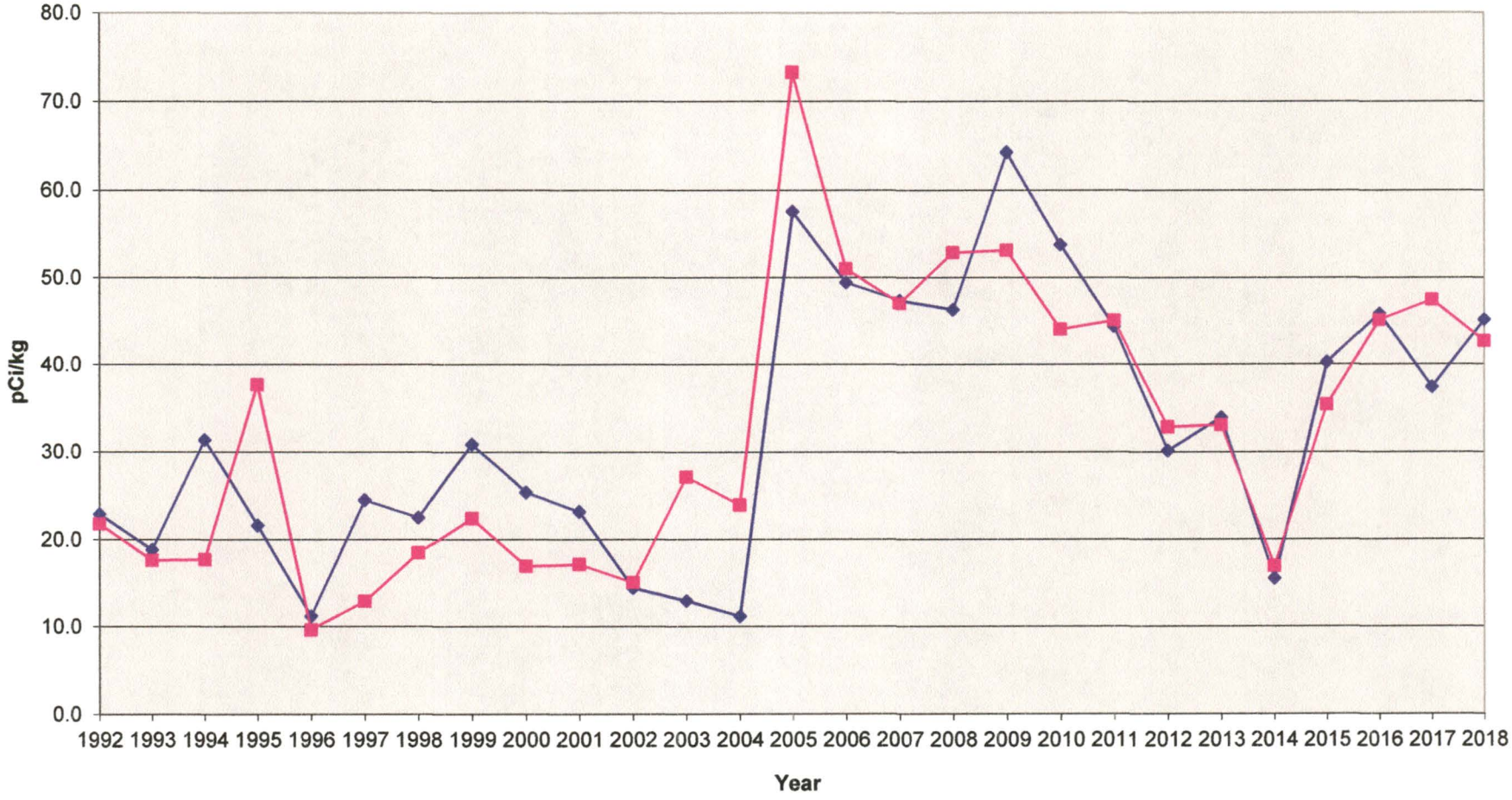


Figure 6.12 - Cesium 137 in Fish - Annual Average Concentrations



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

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

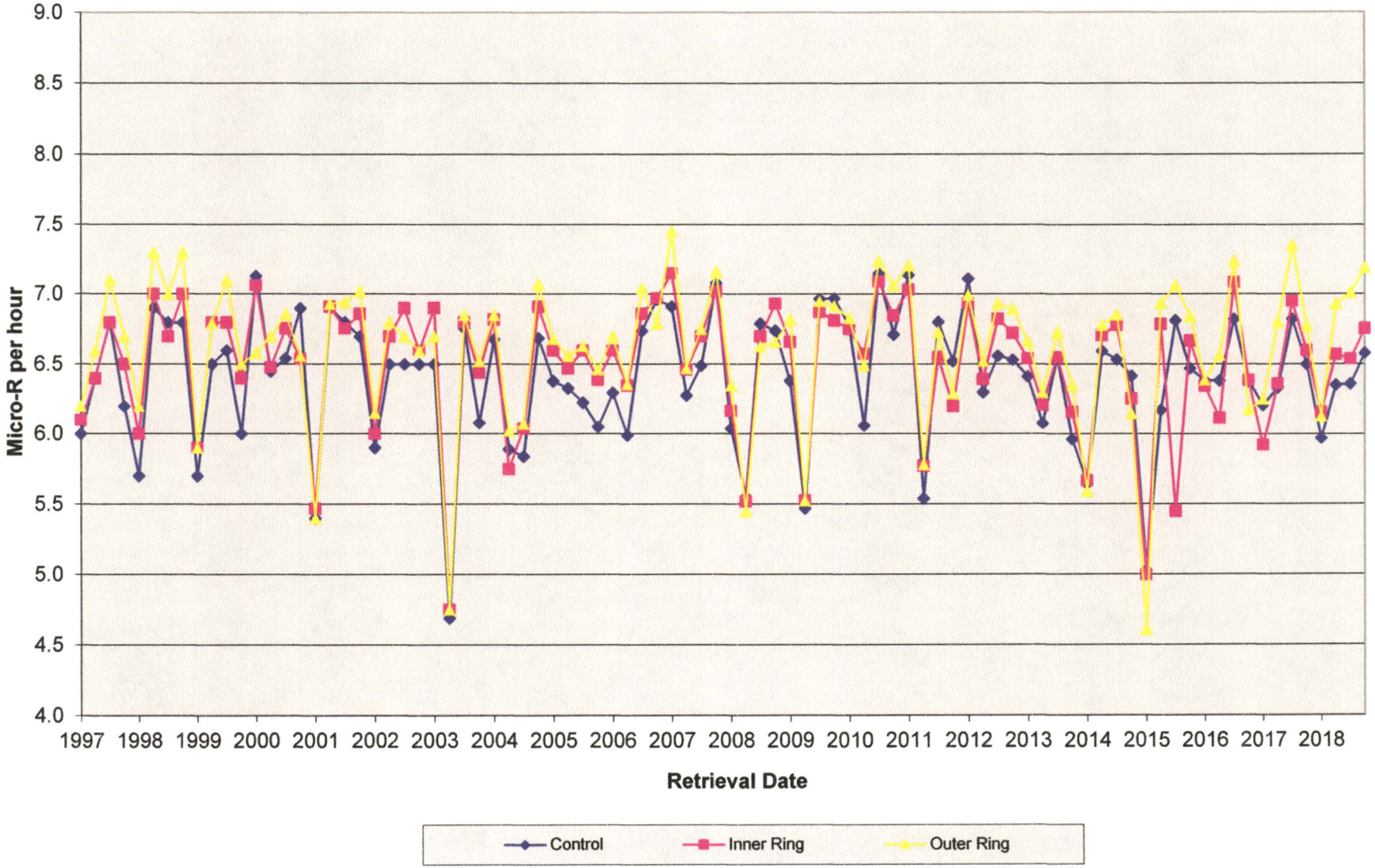


Figure 6.14 - Exposure Rate at Indicator TLDs, DR1-3

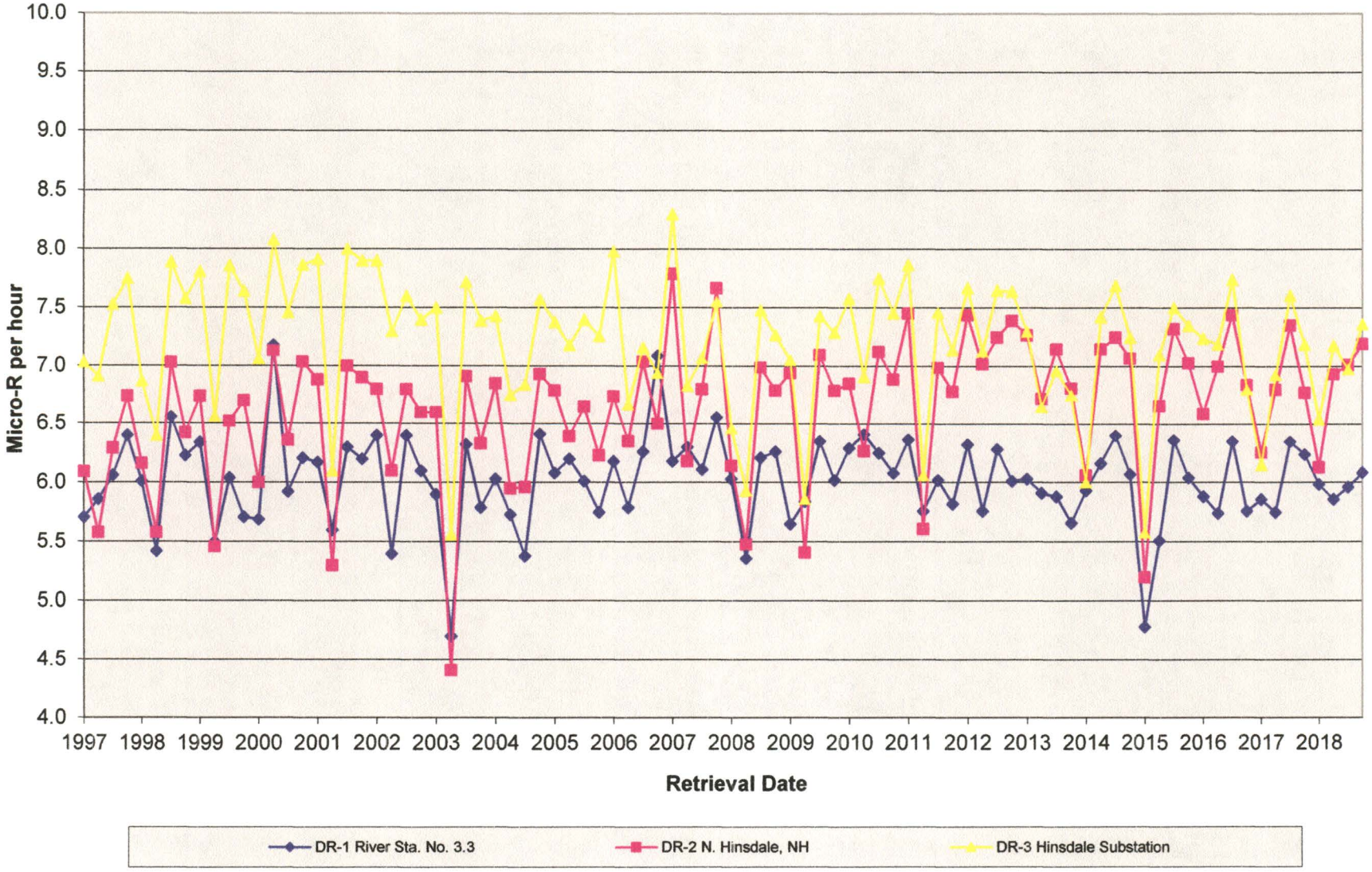


Figure 6.15 - Exposure Rate at Indicator TLDs, DR-6 & DR-50

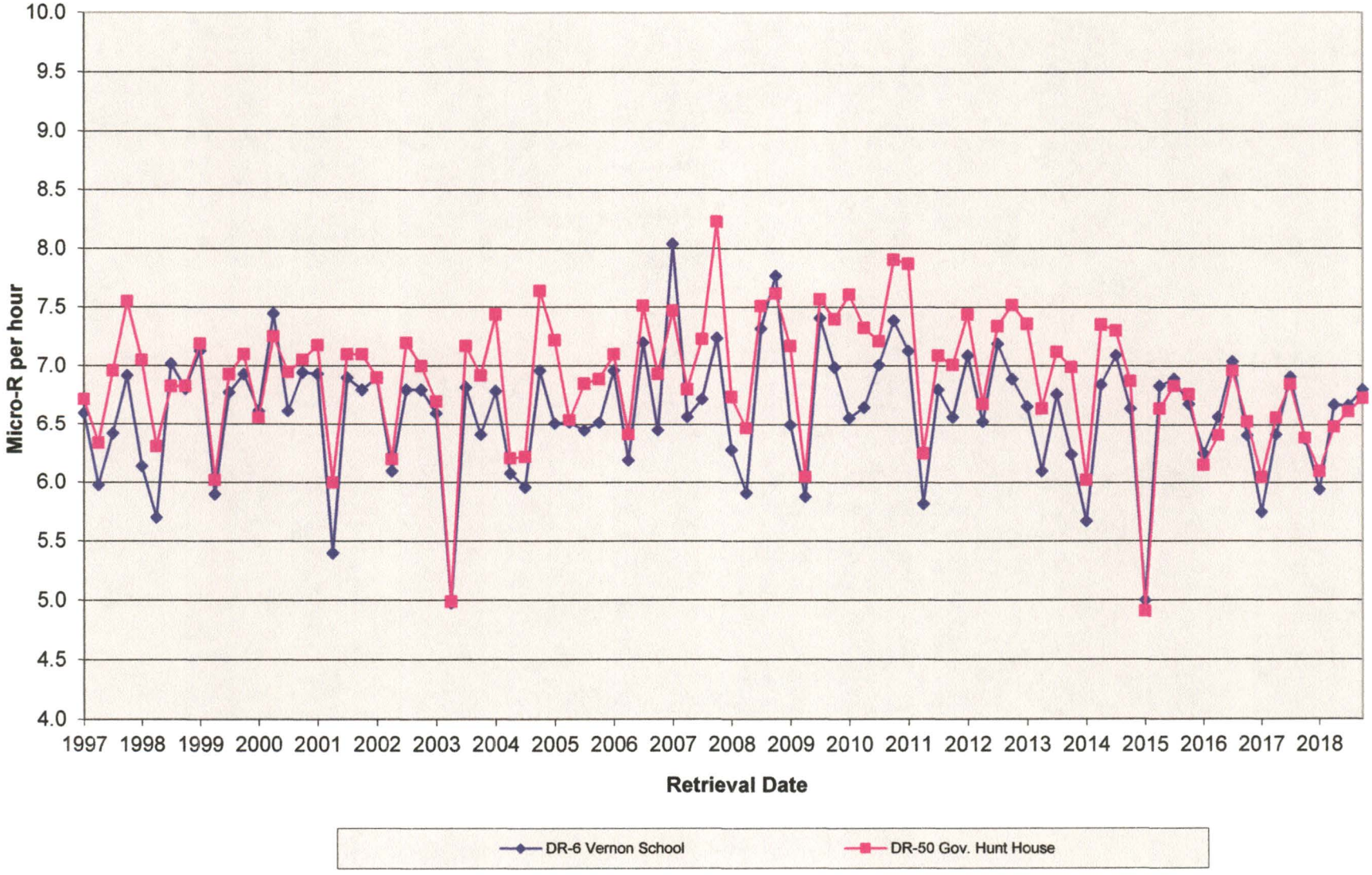


Figure 6.16 - Exposure Rate at Site Boundary TLDs DR-7, 8, 41 & 42

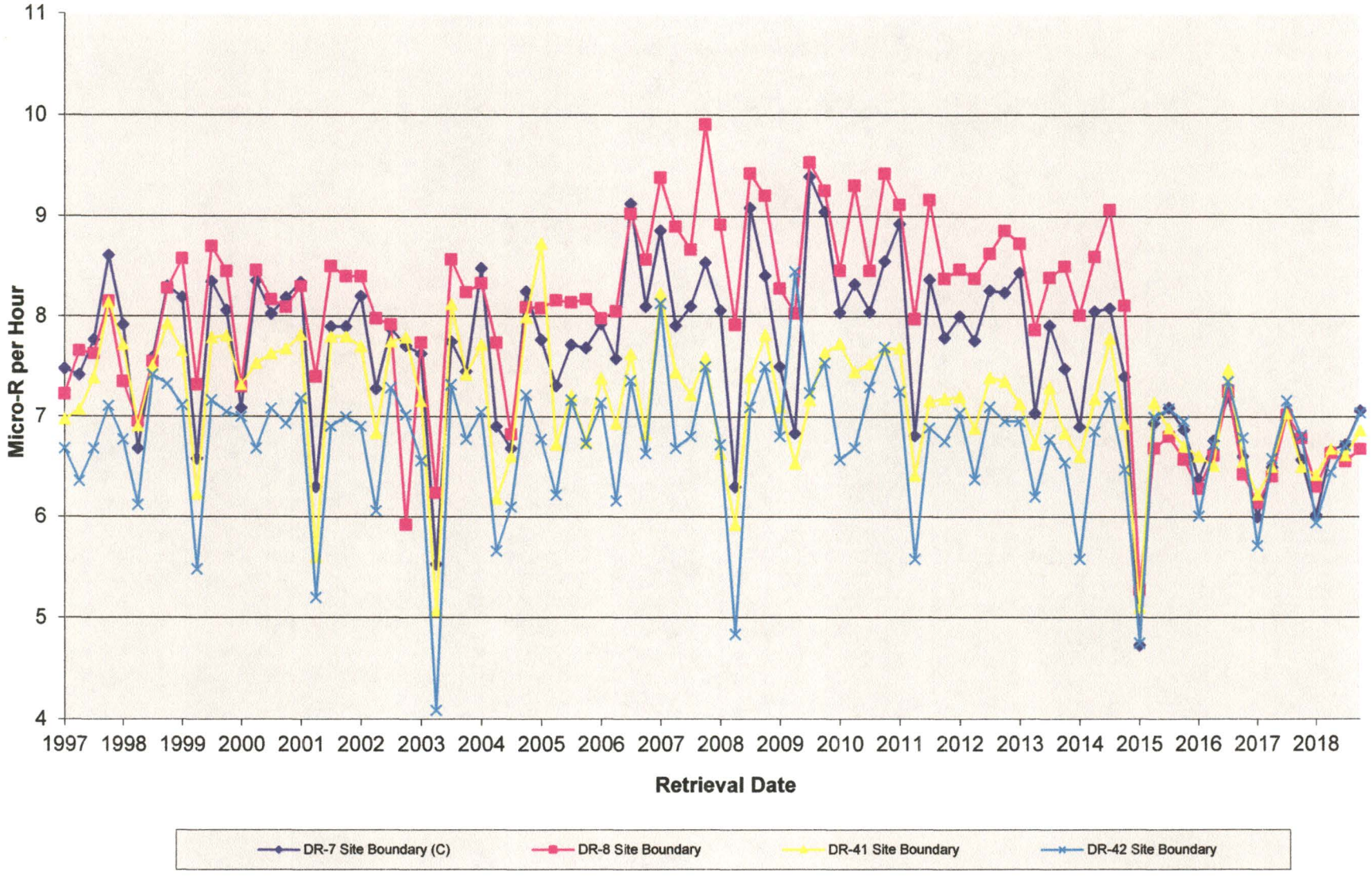


Figure 6.17 - Exposure Rate at Site Boundary TLDs - DR-43 thru 46

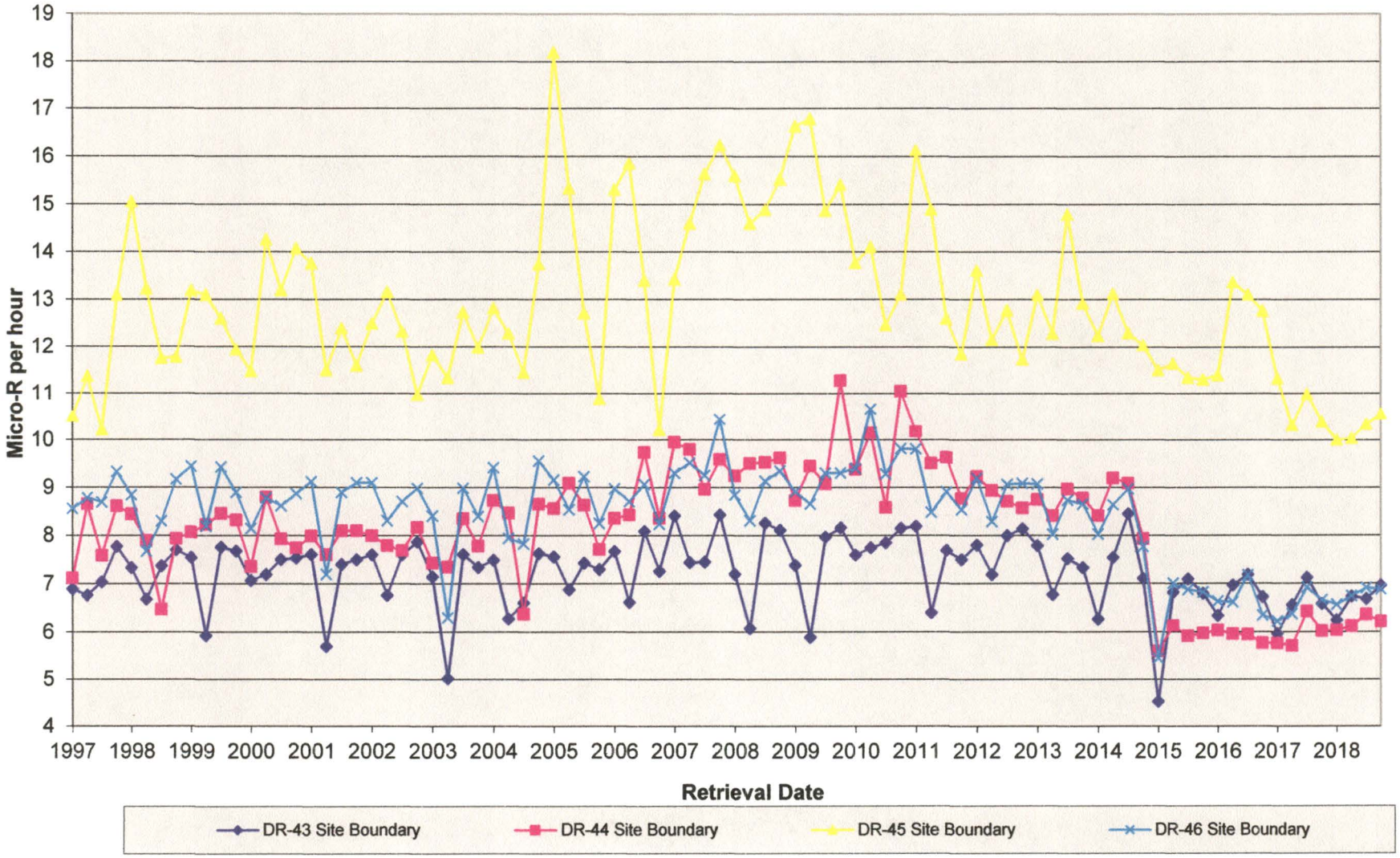


Figure 6.18 - Exposure Rate at Site Boundary TLDs DR-47-49 & 51-53

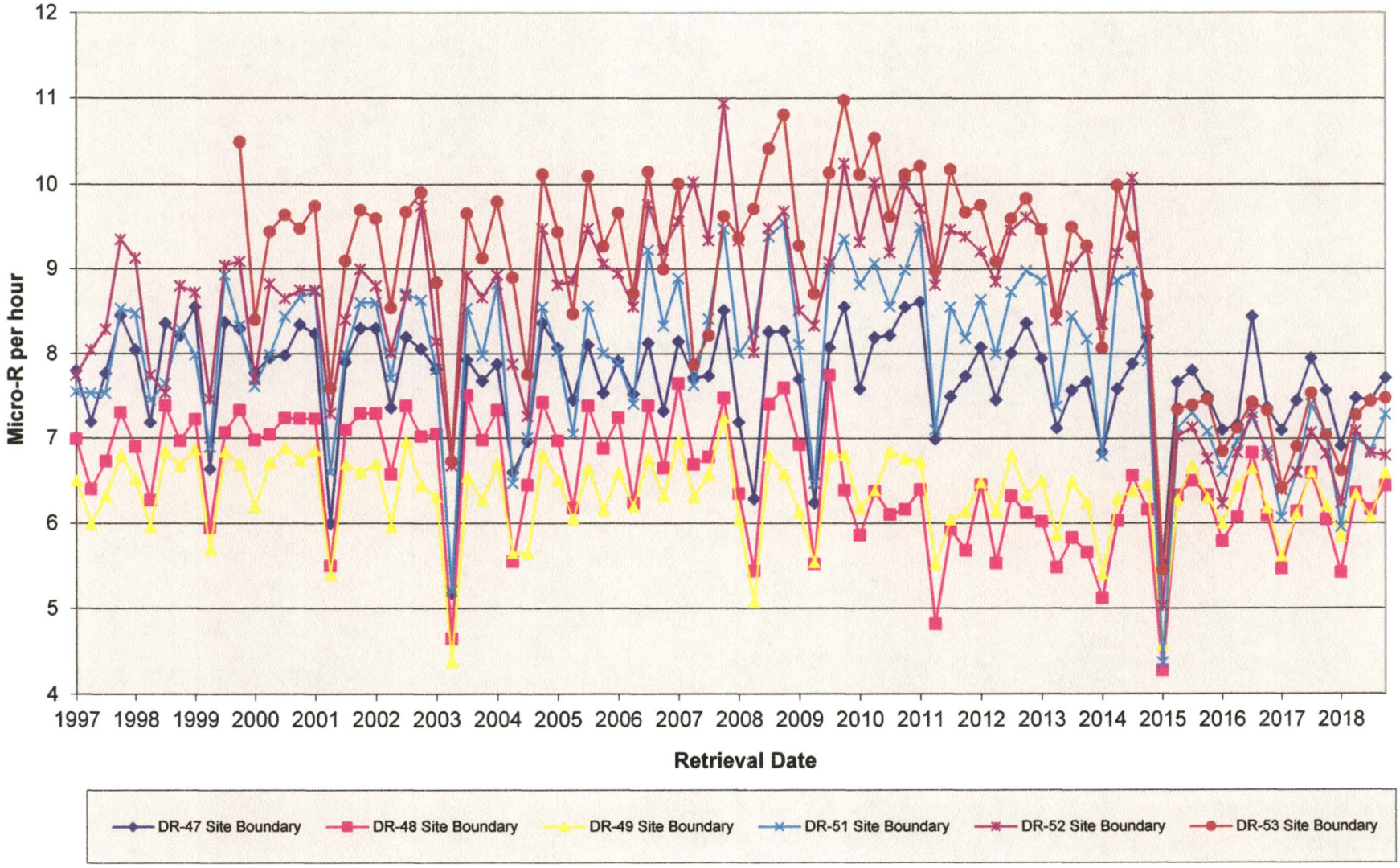
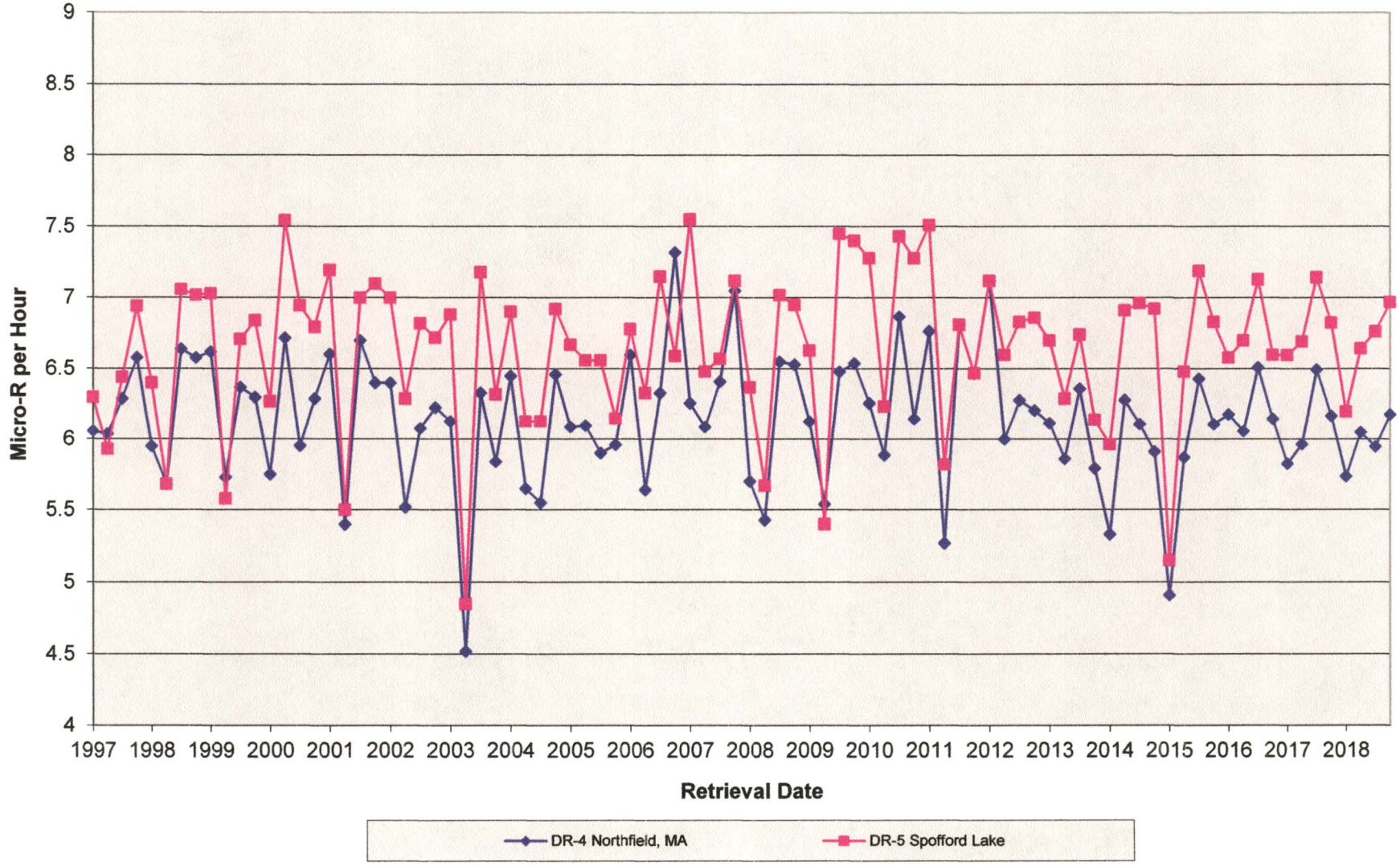


Figure 6.27 - Exposure Rate at Control TLDs DR-4 & 5



7.0 QUALITY ASSURANCE PROGRAM

7.1 ENVIRONMENTAL (STANFORD) DOSIMETRY COMPANY

ENVIRONMENTAL DOSIMETRY COMPANY

ANNUAL QUALITY ASSURANCE STATUS REPORT

January - December 2018

Prepared By: _____ Date: 3/12/19

Approved By: _____ Date: 3/12/19

Environmental Dosimetry Company
10 Ashton Lane
Sterling, MA 01564

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EXECUTIVE SUMMARY

Routine quality control (QC) testing was performed for dosimeters issued by the Environmental Dosimetry Company (EDC) .

During this annual period, 100% (72/72) of the individual dosimeters, evaluated against the EDC internal performance acceptance criteria (high-energy photons only), met the criterion for accuracy and 100% (72/72) met the criterion for precision (Table 1). In addition, 100% (12/12) of the dosimeter sets evaluated against the internal tolerance limits met EDC acceptance criteria (Table 2) and 100% (6/6) of independent testing passed the performance criteria (Table 3). Trending graphs, which evaluate performance statistic for high-energy photon irradiations and co-located stations are given in Appendix A.

One internal assessment and one external audit were performed in 2018.There were no findings identified.

I. INTRODUCTION

The TLD systems at the Environmental Dosimetry Company (EDC) are calibrated and operated to ensure consistent and accurate evaluation of TLDs. The quality of the dosimetric results reported to EDC clients is ensured by in-house performance testing and independent performance testing by EDC clients, and both internal and client directed program assessments.

The purpose of the dosimetry quality assurance program is to provide performance documentation of the routine processing of EDC dosimeters. Performance testing provides a statistical measure of the bias and precision of dosimetry processing against a reliable standard, which in turn points out any trends or performance changes. Two programs are used:

A. QC Program

Dosimetry quality control tests are performed on EDC Panasonic 814 Environmental dosimeters. These tests include: (1) the in-house testing program coordinated by the EDC QA Officer and (2) independent test perform by EDC clients. In-house test are performed using six pairs of 814 dosimeters, a pair is reported as an individual result and six pairs are reported as the mean result.Results of these tests are described in this report.

Excluded from this report are instrumentation checks. Although instrumentation checks represent an important aspect of the quality assurance program, they are not included as process checks in this report. Instrumentation checks represent between 5-10% of the TLDs processed.

B. QA Program

An internal assessment of dosimetry activities is conducted annually by the Quality Assurance Officer (Reference 1). The purpose of the assessment is to review procedures, results, materials or components to identify opportunities to improve or enhance processes and/or services.

II. PERFORMANCE EVALUATION CRITERIA

A. Acceptance Criteria for Internal Evaluations

1. Bias

For each dosimeter tested, the measure of bias is the percent deviation of the reported result relative to the delivered exposure. The percent deviation relative to the delivered exposure is calculated as follows:

$$\frac{(H_i' - H_i)}{H_i} 100$$

where:

H_i' = the corresponding reported exposure for the i^{th} dosimeter (i.e., the reported exposure)

H_i = the exposure delivered to the i^{th} irradiated dosimeter (i.e., the delivered exposure)

2. Mean Bias

For each group of test dosimeters, the mean bias is the average percent deviation of the reported result relative to the delivered exposure. The mean percent deviation relative to the delivered exposure is calculated as follows:

$$\sum\left(\frac{(H_i' - H_i)}{H_i}\right)100\left(\frac{1}{n}\right)$$

where:

H_i' = the corresponding reported exposure for the i^{th} dosimeter (i.e., the reported exposure)

H_i = the exposure delivered to the i^{th} irradiated test dosimeter (i.e., the delivered exposure)

n = the number of dosimeters in the test group

3. Precision

For a group of test dosimeters irradiated to a given exposure, the measure of precision is the percent deviation of individual results relative to the mean reported exposure. At least two values are required for the determination of precision. The measure of precision for the i^{th} dosimeter is:

$$\left(\frac{(H_i' - \bar{H})}{\bar{H}}\right)100$$

where:

H_i' = the reported exposure for the i^{th} dosimeter (i.e., the reported exposure)

$\bar{H}$ = the mean reported exposure; i.e., $\bar{H} = \sum H_i'\left(\frac{1}{n}\right)$

n = the number of dosimeters in the test group

4. EDC Internal Tolerance Limits

All evaluation criteria are taken from the "EDC Quality System Manual," (Reference 2). These criteria are only applied to individual test dosimeters irradiated with high-energy photons (Cs-137) and are as follows for Panasonic Environmental dosimeters: ± 15% for bias and ± 12.8% for precision.

B. QC Investigation Criteria and Result Reporting

EDC Quality System Manual (Reference 2) specifies when an investigation is required due to a QC analysis that has failed the EDC bias criteria. The criteria are as follows:

1. No investigation is necessary when an individual QC result falls outside the QC performance criteria for accuracy.

2. Investigations are initiated when the mean of a QC processing batch is outside the performance criterion for bias.

C. Reporting of Environmental Dosimetry Results to EDC Customers

1. All results are to be reported in a timely fashion.

2. If the QA Officer determines that an investigation is required for a process, the results shall be issued as normal. If the QC results prompting the investigation have a mean bias from the known of greater than ±20%, the results shall be issued with a note indicating that they may be updated in the future, pending resolution of a QA issue.

3. Environmental dosimetry results do not require updating if the investigation has shown that the mean bias between the original results and the corrected results, based on applicable correction factors from the investigation, does not exceed ±20%.

III. DATA SUMMARY FOR ISSUANCE PERIOD JANUARY-DECEMBER 2018

A. General Discussion

Results of performance tests conducted are summarized and discussed in the following sections. Summaries of the performance tests for the reporting period are given in Tables 1 through 3 and Figures 1 through 4.

Table 1 provides a summary of individual dosimeter results evaluated against the EDC internal acceptance criteria for high-energy photons only. During this period100% (72/72) of the individual dosimeters, evaluated against these criteria, met the tolerance limits for accuracy and 100% (72/72) met the criterion for precision. A graphical interpretation is provided in Figures 1 and 2.

Table 2 provides the bias and standard deviation results for each group (N=6) of dosimeters evaluated against the internal tolerance criteria. Overall,100% (12/12) of the dosimeter sets, evaluated against the internal tolerance performance criteria, met these criteria. A graphical interpretation is provided in Figure 3.

Table 3 presents the independent blind spike results for dosimeters processed during this annual period. All results passed the performance acceptance criterion. Figure 4 is a graphical interpretation of Seabrook Station blind co-located station results.

B. Result Trending

One of the main benefits of performing quality control tests on a routine basis is to identify trends or performance changes. The results of the Panasonic environmental dosimeter performance tests are presented in Appendix A. The results are evaluated against each of the performance criteria listed in Section II, namely: individual dosimeter accuracy, individual dosimeter precision, and mean bias.

All of the results presented in Appendix A are plotted sequentially by processing date.

IV. STATUS OF EDC CONDITION REPORTS (CR)

No condition reports were issued during this annual period.

V. STATUS OF AUDITS/ASSESSMENTS

1. Internal

EDC Internal Quality Assurance Assessment was conducted during the fourth quarter 2018. There were no findings identified.

2. External

None.

VI. PROCEDURES AND MANUALS REVISED DURING JANUARY - DECEMBER 2018

No procedures or manuals were revised in 2018.

VII. CONCLUSION AND RECOMMENDATIONS

The quality control evaluations continue to indicate the dosimetry processing programs at the EDC satisfy the criteria specified in the Quality System Manual. The EDC demonstrated the ability to meet all applicable acceptance criteria.

VIII. REFERENCES

1. EDC Quality Control and Audit Assessment Schedule, 2018.

2. EDC Manual 1, Quality System Manual, Rev. 3, August 1, 2017.

TABLE 1

PERCENTAGE OF INDIVIDUAL DOSIMETERS THAT PASSED EDC INTERNAL CRITERIA JANUARY – DECEMBER 2018[1], [2]

Dosimeter Type	Number Tested	% Passed Bias Criteria	% Passed Precision Criteria
Panasonic Environmental	72	100	100

[1]This table summarizes results of tests conducted by EDC.
[2]Environmental dosimeter results are free in air.

TABLE 2

MEAN DOSIMETER ANALYSES (N=6) JANUARY – DECEMBER 2018[1], [2]

Process Date	Exposure Level	Mean Bias %	Standard Deviation %	Tolerance Limit +/- 15%
4/30/2018	27	3.5	2.3	Pass
5/02/2018	44	8.0	1.5	Pass
5/03/2018	99	4.6	2.2	Pass
7/27/2018	55	1.0	0.8	Pass
7/30/2018	72	2.5	1.5	Pass
8/2/2018	113	4.0	1.7	Pass
10/29/2018	34	2.6	1.2	Pass
11/03/2018	67	1.7	1.5	Pass
11/17/2018	109	5.0	0.9	Pass
1/23/2019	107	1.3	1.1	Pass
1/26/2019	123	-0.3	2.0	Pass
2/04/2019	39	1.0	1.1	Pass

[1]This table summarizes results of tests conducted by EDC for TLDs issued in 2018.
[2]Environmental dosimeter results are free in air.

TABLE 3
SUMMARY OF INDEPENDENT DOSIMETER TESTING JANUARY – DECEMBER 2018[1], [2]

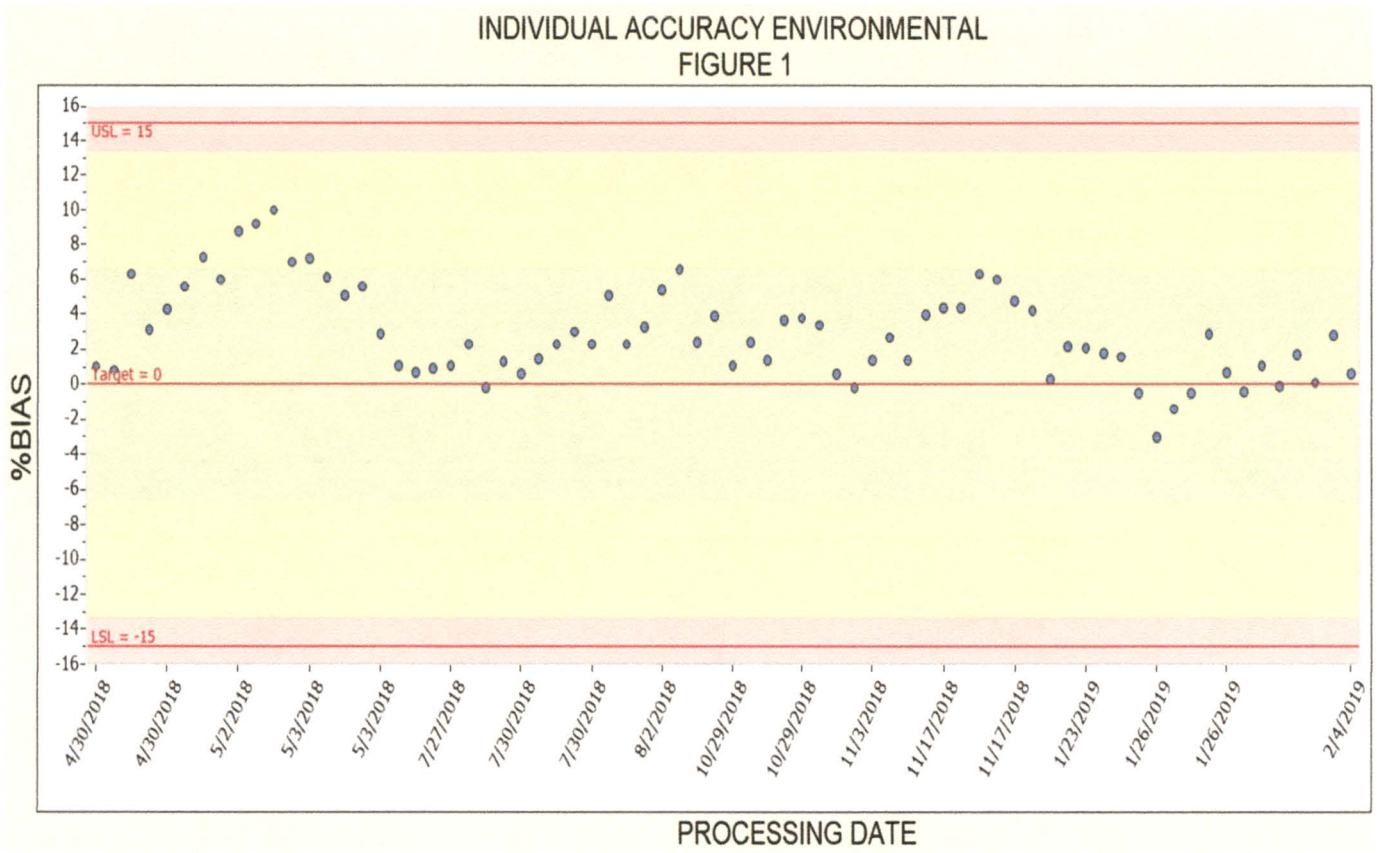
Issuance Period	Client	Mean Bias %	Standard Deviation %	Pass / Fail
1st Qtr. 2018	Millstone	2.4	1.9	Pass
2nd Qtr.2018	Millstone	8.2	1.4	Pass
2nd Qtr.2018	Seabrook	2.6	0.9	Pass
2nd Qtr.2018	SONGS	-3.9	1.3	Pass
3rd Qtr. 2018	Millstone	2.6	0.9	Pass
3rd Qtr. 2018	PSEG(PNNL)	-4.8	1.3	Pass
4th Qtr.2018	Millstone	1.0	1.2	Pass
4th Qtr.2018	Seabrook	6.8	1.1	Pass

[1]Performance criteria are +/- 15%.
[2]Blind spikeirradiations using Cs-137

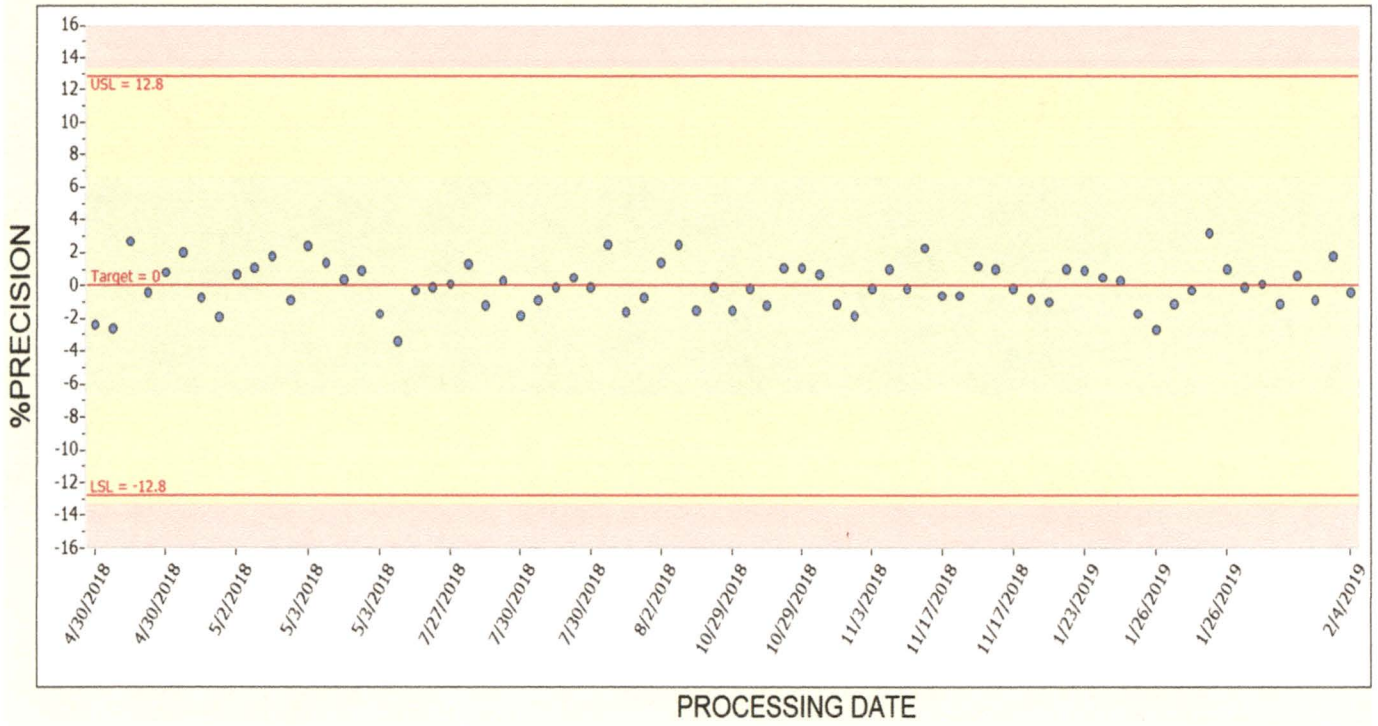
APPENDIX A

DOSIMETRY QUALITY CONTROL TRENDING GRAPHS

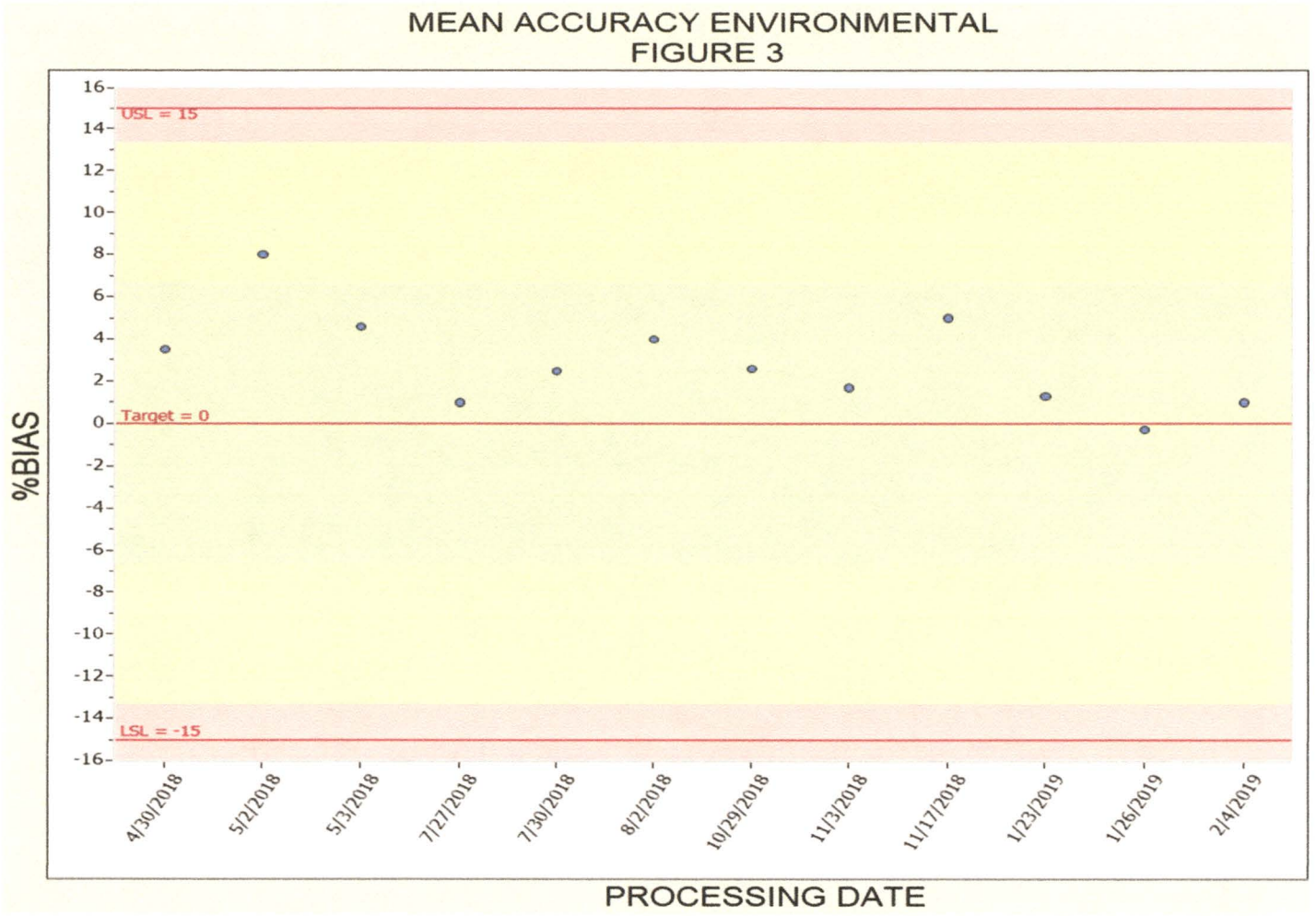
ISSUE PERIOD JANAURY - DECEMBER 2018


INDIVIDUAL ACCURACY ENVIRONMENTAL
FIGURE 1
%BIAS
USL = 15
Target = 0
LSL = -15
16
14
12
10
8
6
4
2
0
-2
-4
-6
-8
-10
-12
-14
-16
4/30/2018
4/30/2018
5/2/2018
5/3/2018
5/3/2018
7/27/2018
7/30/2018
7/30/2018
8/2/2018
10/29/2018
10/29/2018
11/3/2018
11/17/2018
11/17/2018
1/23/2019
1/26/2019
1/26/2019
2/4/2019
PROCESSING DATE

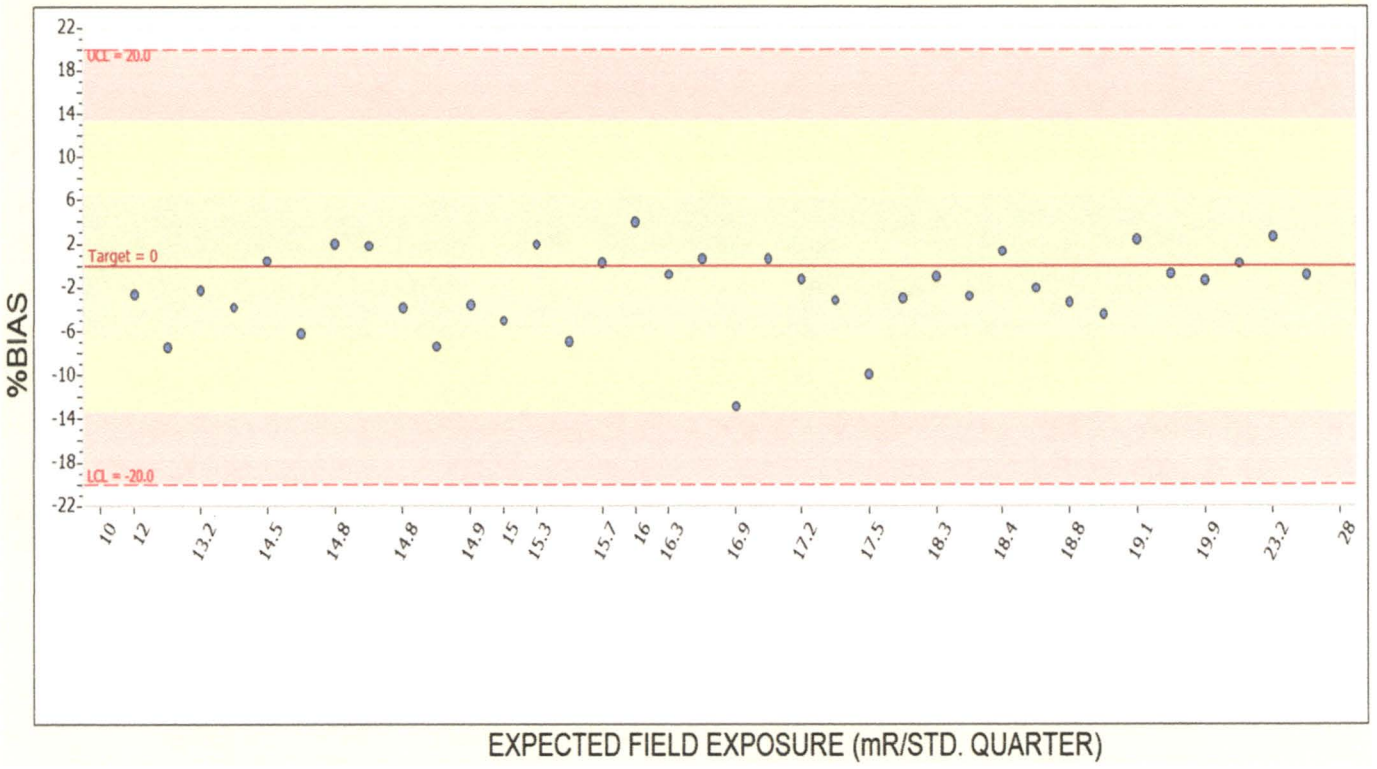
INDIVIDUAL PRECISION ENVIRONMENTAL
FIGURE 2



MEAN ACCURACY ENVIRONMENTAL
FIGURE 3



SEABROOK CO-LOCATE ACCURACY
FIGURE 4



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

7.2.1 Operational Quality Control Scope

7.2.1.1 Inter-laboratory

The Teledyne Brown Engineering Environmental Services Laboratory Quality Control (QC) Program is designed to monitor the quality of analytical processing associated with environmental, effluent (10CFR Part 50), bioassay, industrial process, and waste characterization (10CFR Part 61) samples.

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

TBE-ES also participates in the Department of Energy's (DOE) Mixed Analyte Performance Evaluation Program (MAPEP) administered by the U. S. Department of Energy. 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 measurement on samples that contain hazardous and radioactive (mixed) analytes.

Quality Control for radioanalyses during this reporting period consisted of internal process check samples. Results for third-party process check prepared by Analytics, ERA and the DOE's MAPEP are not available at this time due to receipt date from the vendors and are not reported during the first quarter of the year.

7.2.1.2 Intra-laboratory

The internal QC program is designed to include QC functions such as instrumentation checks (to insure proper instrument response), blank samples (to which no analyte radioactivity has been added), for contamination checks, and instrumentation backgrounds. Process controls (or process checks) are either actual samples submitted in duplicate (duplicates) in order to evaluate the precision of laboratory measurements. Blank samples which have been spiked (spikes) with a known quantity of a radioisotope that is of interest to laboratory clients measure the accuracy of analyses. QC samples are intended to evaluate the entire radiochemical and radiometric process. Process control and qualification analyses samples seek to mimic the media type of those samples submitted for analysis by the various laboratory clients. The magnitude of the process control program combines both internal and external sources targeted at 10% of the routine sample analysis load.

To provide direction and consistency in administering the quality assurance program, TBE-ES has developed and follows a Quality Manual and a set of Standard Operating Procedures (SOP). The plan describes the scheduled frequency and scope of Quality Assurance and Quality Control (QA/QC) considered necessary for an adequate QA/QC program conducted throughout the year.

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, State of Tennessee, Nuclear Utility Procurement Issues Committee (NUPIC), New York State and Department of Health's Environmental Laboratory Approval Program (NELAP) 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-five nuclides associated with six media types were analyzed by means of the laboratory's internal process control, Analytics, ERA, MAPEP 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

Thirteen nuclides in milk, air particulate, air iodine (charcoal) and water samples were evaluated for four sets of cross-checks during 2018. Eleven nuclides in soil and air particulate samples were evaluated for two sets of cross-checks during 2018. TBE was not within acceptable range for one Fe-59 in milk, one Cr-51 in soil, and one I-131 in milk. NCR's 18-20, 18-21, & 18-24 were initiated and completed to address the deficiencies. All other environmental analyses performed were within the acceptable/acceptable with warning criteria.

Teledyne Brown Engineering's Analytics' September 2018 milk Fe-59 result was evaluated as Not Acceptable (Ratio of TBE to known result at 132%). The reported value was 158 ± 17.6 pCi/L and the known value was 119 ± 19.9 pCi/L. No cause for the failure could be determined. TBE has passed 24 of the previous 27 milk cross-check results since 2012. This sample was run in duplicate on a different detector with comparable results (162 +/- 16 pCi/L). NOTE: TBE's 4th Qtr result passed at 105% (NCR 18-20)

Teledyne Brown Engineering's Analytics' September milk I-131 result was evaluated as Not Acceptable (Ratio of TBE to known result at 143%). Due to a personnel change in the gamma prep lab, the sample was not prepped/counted in a timely manner such as to accommodate the I-131 8-day half-life. Analysts have been made aware of the urgency for this analysis and it will be monitored more closely by QA. NOTE: TBE's 4th Qtr result passed at 101% (NCR 18-24)

Teledyne Brown Engineering's Analytics' September soil Cr-51 result was evaluated as Not Acceptable (Ratio of TBE to known result at 131%). As with the previous above, the sample was not prepped/counted in a timely manner such as to accommodate the Cr-51 27-day half-life. The same corrective action applies here as in #3. (NCR 18-21)

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

Thirteen nuclides in water, air particulate, soil, and vegetation samples were evaluated twice in 2018. For the 1st set of cross-checks, TBE was unable to report Sr-90 in vegetation due to QC failure & limited sample. For the 2nd set of cross-checks, the Sr-90 in vegetation result was not in the acceptable range. NCR's 18-09 and 18-25 were initiated & completed to address the deficiencies. All other environmental analyses that were reported were within the acceptable/acceptable with warning criteria.

Teledyne Brown Engineering was unable to report the February 2018 DOE MAPEP vegetation Sr-90 result due to QC failure and limited sample amount. (NCR 18-09)

Teledyne Brown Engineering's MAPEP November vegetation Sr-90 result of 0.338 Bq/sample was evaluated as Not Acceptable (Lower acceptable range was 0.554 Bq/sample). It appears that there has been incomplete dissolution of Sr-90 due to the composition of the MAPEP vegetation "matrix". To resolve this issue, the TBE-2018 procedure has been modified to add 50% H2O2 to assist in breaking down the organic material that comprises this "matrix". This corrective action will be monitored closely by QA. (NCR 18-25).

7.2.2.1.4 Summary of participation in the ERA Program

Twelve nuclides were evaluated in air particulate and water samples twice during 2018. For the 2nd set of cross-check samples, the Sr-90 result was not within the ERA acceptable range. NCR 18-23. All other analyses performed were within the acceptable criteria.

Teledyne Brown Engineering's ERA October 2018 water Sr-90 sample was evaluated as Not Acceptable. TBE's initial reported result of 36.8 pCi/L exceeded the upper acceptance range (22.9 – 36.4 pCi/L). After reviewing the data for this sample, it was discovered that there was a typographical error at the time the results were entered at the ERA website. The correct result in LIMS of 36.2 should have been submitted instead. This result is within ERA's acceptance limits. In addition to the typo error, ERA's very stringent upper acceptance limit of 116% is not a reflection of TBE's ability to successfully perform this analysis. (NCR 18-23)

7.2.2.2 Intra-Laboratory Process Control Program

The TBE-ES Laboratory's internal process control program evaluated 7984 individual samples.

7.2.2.2.1 Spikes/Matrix Spikes

All of the 1617 environmental spikes were analyzed with statistically appropriate activity reported for each spike. One LSC failed with a recovery of 67.8% and all of the samples for the workgroup were re-prepped and reanalyzed under two new workgroups.

7.2.2.2.2 Analytical Blanks

During this reporting period, all of the 1627 environmental analytical blanks analyzed reported less than MDC.

7.2.2.2.3 Duplicates Total

All of the 4740 duplicate sets analyzed were within acceptable limits. One LCSD failed with a RPD of 59.3 (limit of 30). All of the samples for the workgroup were re-prepped and reanalyzed under two new workgroups.

7.2.2.2.4 Non-Conformance Reports

There were 28 non-conformance reports issued for this reporting period. No ENNVY data was impacted by the non-conformance in each of these cases.

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 2018 Land Use Census was conducted in the summer of 2018 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 would be 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. No changes in the census data from year 2008 occurred in the 2018 census; therefore no revisions of the 2008 calculations were required.

Pursuant to ODCM 3.5.2.a, a dosimetric analysis would be 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 2018 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 2018 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

2018 LAND USE CENSUS LOCATIONS*

SECTOR	NEAREST RESIDENCE Km (Mi)	NEAREST MILK ANIMAL Km (Mi)
N	1.4 (0.9)	----
NNE	1.4 (0.9)	5.52 (3.42) Cows
NE	1.3 (0.8)	----
ENE	1.0 (0.6)	----
E	0.9 (0.6)	----
ESE	1.9 (1.2)	----
SE	2.0 (1.2)	6.67 (4.4) Cows
SSE	2.1 (1.3)	----
S	0.6 (0.4)	3.6 (2.23) Cows**
SSW	0.8 (0.5)	----
SW	0.4 (0.3)	----
WSW	0.5 (0.3)	9.73 (6.03) Cows
W	0.6 (0.4)	0.82 (0.5) Cows
WNW	1.1 (0.7)	----
NW	2.3 (1.4)	----
NNW	1.7 (1.1)	----

* 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 2018, as in previous years during plant operation, a program was conducted to assess the levels of radiation or radioactivity in the Vermont Yankee Nuclear Power Station environment. Over 500 samples were collected (including TLDs) over the course of the year, with a total of over 10,000 radionuclide or exposure rate analyses performed. The samples included groundwater, river water, sediment, fish, 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 Potassium-40, Beryllium-7, Thorium-232 or radon daughter products. These are the most common of the naturally-occurring radionuclides.

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

Tritium (Hydrogen-3), at concentrations significantly higher than background levels, was detected in on-site groundwater monitoring wells installed in 2007 and in 2010 in response to industry events and the discovery of primary system leakage from underground Augmented Off Gas (AOG) System condensate return piping into the subsurface groundwater pool under the plant site. The leakage from this piping was terminated in early February, 2010. Extensive sampling and analysis was performed on groundwater samples and other media throughout all of year 2018. Steps to remediate the contamination of the subsurface groundwater layer under the plant site were terminated in December 2014. Additional assessment of the dose contribution of radioactive waterborne releases from this event is provided in the 2018 Annual Radioactive Effluent Release Report.

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.

3. *Ionizing Radiation: Sources and Biological Effects,* United Nations Scientific Committee on the Effects of Atomic Radiation (UNSCEAR), 1982 Report to the General Assembly.

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.

7. Vermont Yankee Offsite Dose Calculation Manual (ODCM), Revision 40, October 23, 2018.