

## ZION STATION RESTORATION PROJECT FINAL STATUS SURVEY RELEASE RECORD

### AUXILIARY BUILDING PENETRATIONS SURVEY UNIT 05120





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#### LIST OF ACRONYMS AND ABBREVIATIONS

ALARA	As Low As Reasonably Achievable
AMCG	Average Member of the Critical Group
BFM	Basement Fill Model
DQA	Data Quality Assessment
DQO	Data Quality Objective
DCGL	Derived Concentration Guideline Level
EMC	Elevated Measurement Comparison
FOV	Field-of-View
FSS	Final Status Survey
IC	Insignificant Contributor
ID	Internal Diameter
LTP	License Termination Plan
MARSSIM	Multi-Agency Radiation Survey and Site Investigation Manual
WARSSIN	That Agency Radiation Survey and Site investigation Manual
MDC	Minimum Detectable Concentration
MDC	Minimum Detectable Concentration
MDC NaI	Minimum Detectable Concentration Sodium Iodide
MDC NaI QAPP	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan
MDC NaI QAPP OpDCGL	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan Operational Derived Concentration Guideline Level
MDC NaI QAPP OpDCGL QC	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan Operational Derived Concentration Guideline Level Quality Control
MDC NaI QAPP OpDCGL QC RE	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan Operational Derived Concentration Guideline Level Quality Control Radiological Engineer
MDC NaI QAPP OpDCGL QC RE ROC	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan Operational Derived Concentration Guideline Level Quality Control Radiological Engineer Radionuclides of Concern
MDC NaI QAPP OpDCGL QC RE ROC SOF	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan Operational Derived Concentration Guideline Level Quality Control Radiological Engineer Radionuclides of Concern Sum-of-Fraction
MDC NaI QAPP OpDCGL QC RE ROC SOF TSD	Minimum Detectable Concentration Sodium Iodide Quality Assurance Project Plan Operational Derived Concentration Guideline Level Quality Control Radiological Engineer Radionuclides of Concern Sum-of-Fraction Technical Support Document



#### **1. EXECUTIVE SUMMARY**

This Final Status Survey (FSS) Release Record for survey unit 05120, "Auxiliary Building Penetrations", has been generated for the Zion Station Restoration Project (ZSRP) in accordance with Zion*Solutions* procedure ZS-LT-300-001-005, "*Final Status Survey Data Reporting*" (Reference 1) and satisfies the requirements of Section 5.11 of the "Zion Station Restoration Project License Termination Plan" (LTP) (Reference 2).

Two (2) Final Status Survey (FSS) sample plans (S1-05120A-F #1 and S1-05120A-F #2) were developed to perform this work in accordance with Zion*Solutions* procedure ZS-LT-300-001-001, *"Final Status Survey Package Development"* (Reference 3), the ZSRP LTP, and with guidance from NUREG-1575, *"Multi-Agency Radiation Survey and Site Investigation Manual"* (MARSSIM) (Reference 4).

Final Status Survey was performed to demonstrate that the concentrations of residual radioactivity on the interior surfaces of the penetrations were equal to or below site-specific Derived Concentration Guideline Levels (DCGL) corresponding to the dose criterion in 10 CFR 20.1402. Initially, the penetrations were segregated and classified in accordance with the type of system and system use. However, in a conservative measure to ensure that all accessible surfaces within each end-state penetration would be subjected to FSS, the classification of all penetrations was changed to Class 1.

Two (2) different survey approaches were used for FSS depending on the diameter, length and access to the penetrations. FSS measurements acquired under FSS sample plan #1, which was applicable to penetrations with an internal diameter (ID) less than 12 inches, consisted of a static measurement taken at 1-foot intervals inside the penetration using a sodium iodide (NaI), conservatively assuming a Field-of-View (FOV) of 1-foot for each measurement and thus providing 100% areal coverage of the accessible internal surfaces of the penetration.

FSS measurements acquired under FSS sample plan #2, which was applicable to penetrations with an ID greater than 12 inches, consisted of a 100% scan with a handheld beta-gamma detector of the interior surface area of the penetration and at least one (1) 1-minute static gross beta-gamma measurement at a systematic location based on a triangular grid and a 1-minute static measurement at the location of the highest observed scan result in each penetration.

For the FSS of the Auxiliary Building Penetrations, sixty-six (66) measurements were obtained. LTP Chapter 6, section 6.4.5 states, "The dose from penetrations is summed with the dose from the wall and floor surfaces of both basements that the penetration interface." Containment DCGLs are more limiting than the Auxiliary Building DCGLs. Consequently, the penetrations identified as interfacing between the Auxiliary Building



and the Unit 1 and Unit 2 Containments were addressed in the Release Records for Unit 1 and Unit 2 Containment Penetrations. In order to comply with the requirements of LTP Chapter 6, section 6.4.5, a dose of 1.468 mrem/yr will be added to the Auxiliary Building basement survey unit from penetrations that interfaced between the Auxiliary Building and Unit 1 Containment and a dose of 0.206 mrem/yr will be added to the Auxiliary Building basement survey unit from penetrations that interfaced between the Auxiliary Building basement survey unit from penetrations that interfaced between the Auxiliary Building and Unit 2 Containment. The Auxiliary Building penetrations addressed in this Release Record interfaced with the Turbine Building (via the "G" wall and Steam Tunnels). Consequently, the FSS design for penetrations that interfaced between the Auxiliary Building penetrations, which were the most limiting. However, the mean concentration for each Radionuclide-of-Concern (ROC) was also compared against the Base Case Penetration DCGLs (BcDCGL<sub>PN</sub>) for the Turbine Building as well.

No single measurement taken in any penetration exceeded an Operational Sum of Fraction (OpSOF) of one (1) when compared against the Operational DCGLs (OpDCGL<sub>PN</sub>) for Auxiliary Building Penetrations. When compared against the BcDCGL<sub>PN</sub> for the Auxiliary Building, the FSS results produced a mean Base Case SOF (BcSOF) for the survey unit of 0.002, which equates to a mean dose of 0.053 mrem/yr.

No penetration exceeded the Auxiliary Building  $OpDCGL_{PN}$  or  $BcDCGL_{PN}$ . However, in accordance with LTP Chapter 5 section 5.5.5, two (2) of the penetrations required grouting as they had measurements with activity greater than the Turbine Building OpDCGL for surfaces. Grouting of the two (2) penetrations was performed prior to backfill and there was no dose reduction attributed to the survey unit because of grouting.

#### 2. SURVEY UNIT DESCRIPTION

In accordance with the definition of penetrations specified in LTP Chapter 5, section 5.5.5, "The end state will include embedded piping and penetrations. An embedded pipe is defined as a pipe that runs vertically through a concrete wall or horizontally through a concrete floor and is contained within a given building. A penetration is defined as a pipe (or remaining pipe sleeve, if the pipe is removed, or concrete, if the pipe and pipe sleeve is removed) that runs through a concrete wall and/or floor, between two buildings, and is open at the wall or floor surface of each building. A penetration could also be a pipe that runs through a concrete wall and/or floor and opens to a building on one end and the outside ground on the other end."



A summary of the original End State lengths and surface areas for the Auxiliary Building Penetrations as depicted in Zion*Solutions* Technical Support Document (TSD) 14-016, "*Description of Embedded Piping, Penetrations, and Buried Pipe to Remain in Zion End State*" (Reference 5), Attachment F. Locations are shown in Attachment 1 of this Release Record.

The Auxiliary Building penetrations survey unit consists of one hundred five (105) penetrations that access the Auxiliary Building between the 542 foot, 560 foot and the 579 foot elevations. However, seventy-nine (79) of the 105 penetrations are identified as being both an Auxiliary Building and Containment Building penetration. Since the Containment DCGLs are more limiting than the Auxiliary Building DCGLs, the penetrations identified as being both Auxiliary and Containment were addressed in the Release Records for Unit 1 and Unit 2 Containment Penetrations.

The remaining twenty-six (26) penetrations that access the Auxiliary Building between the 542, 560 and the 579 foot elevations, but do not access the Containments, are A001-A025, and A034. These penetrations interface between the Auxiliary Building and the Turbine Building primarily through the "G" wall and through the north and south walls into the Unit 1 and Unit 2 Steam Tunnels.

In accordance with LTP Chapter 5, section 5.5.5, penetration survey units have total surface areas that are less than the area of the wall/floor surface survey unit that the penetrations interface. To eliminate the potential for activity levels in penetrations that could lead to releases greater than the adjacent basement walls and floors, the following remediation and grouting action levels were applied to measurements of surface activity in penetrations.

- If maximum activity exceeded the BcDCGL<sub>PN</sub> from LTP Chapter 5, Table 5-13 (BcSOF >1), then remediation was performed.
- If the maximum activity in a penetration exceeded the most limiting  $OpDCGL_B$  from LTP Chapter 5, Table 5-4 of the two basements where a penetrations interface (OpSOF>1), but is below the BcDCGL<sub>PN</sub> from LTP Chapter 5, Table 5-13, then the penetration was remediated or grouted.
- If a penetration was remediated and the maximum activity continued to exceed the most limiting OpDCGL<sub>B</sub> from LTP Chapter 5, Table 5-4 of the two basements where a penetrations interface (OpSOF>1), but was less than the OpDCGL<sub>PN</sub> (LTP Chapter 5, Table 5-14), then the penetration was grouted.
- If the maximum activity was below the surface OpDCGL<sub>B</sub> from LTP Chapter 5, Table 5-4, then grouting of the penetration was not required.



#### 3. CLASSIFICATION BASIS

Survey unit 05120 was classified in accordance with ZionSolutions procedure ZS-LT-300-001-002, "Survey Unit Classification" (Reference 6).

The Auxiliary Building Penetrations were initially classified as Class 1, Class 2, or Class 3 based on historical assessment, exposure to radioactive materials and system use. As a conservative measure, the classifications of all Auxiliary Building Penetrations were changed to Class 1. Consequently, sufficient measurements were taken in all Auxiliary Building Penetrations to ensure 100% areal coverage of all accessible internal surfaces within the penetrations.

The Auxiliary Building housed numerous systems containing radioactively contaminated support systems. System leakage and maintenance activities over the operating life of the reactor resulted in the radiological contamination of most of the interior surfaces of the structures. Based on the building design basis and the operating history, all internal survey units in Auxiliary Building were assigned an initial classification of Class 1 in accordance with the "*Zion Station Historical Site Assessment*" (HSA) (Reference 7).

The Auxiliary Building penetrations housed numerous systems including the following:

- Service and primary water,
- Feed and demineralizer water,
- Fire protection,
- Vent and drain,
- Secondary sample,
- Waste disposal,
- Chemical addition,
- Vacuum control, and
- Condensate.

The location of the penetrations, their function, and the operational history of the Auxiliary Building to support the initial classifications are described in TSD 14-016.

In accordance with ZionSolutions TSD 14-013, "Zion Auxiliary Building End State Estimated Concrete Volumes, Surface Areas, and Source Terms" (Reference 8), there were seventeen (17) concrete core samples from the floors and three (3) cores from the walls that were obtained for analysis. The on-site gamma spectroscopy results for the sectioned cores from the 542 foot elevation initial characterization may be found in TSD 14-013. All radioactive systems and components were still located inside the building, consequently ambient radiation dose rates inside the Auxiliary Building prohibited the



direct assessment of penetrations or system interior surfaces by scanning or direct measurement.

As part of the survey unit turnover process, a Radiological Engineer (RE) performed the visual inspection and walk-down of the survey unit on March 27, 2018. The purpose of the walk-down was to assess the physical condition of the survey unit, evaluate access points and travel paths and identify potentially hazardous conditions and determine if the survey unit was acceptable for performing FSS.

The Auxiliary Building Penetrations were initially classified as Class 1, Class 2, or Class 3, based on historical assessment, exposure to radioactive materials and system use. Based upon completion of the Survey Unit Classification Basis for final classification, which included a review of the historical information, the results of the Characterization Survey data and completion of a final Survey Unit Classification Worksheet, the correct final classification of penetrations within the Auxiliary Building were validated. As a conservative measure, the classifications of all Auxiliary Building Penetrations were changed to Class 1. Consequently, sufficient measurements were taken in all Auxiliary Building Penetrations to ensure 100% areal coverage of all accessible internal surfaces within the penetrations.

#### 4. DATA QUALITY OBJECTIVES (DQO)

Final Status Survey planning and design hinges on coherence with the DQO process to ensure, through compliance with explicitly defined inputs and boundaries, that the primary objective of the survey is satisfied. The DQO process is described in the ZSRP LTP Chapter 5, section 5.6.2 in accordance with MARSSIM. The appropriate design for a given survey was developed using the DQO process as outlined in Appendix D of MARSSIM.

The DQO process incorporated hypothesis testing and probabilistic sampling distributions to control decision errors during data analysis. Hypothesis testing is a process based on the scientific method that compares a baseline condition to an alternate condition. The baseline condition is technically known as the null hypothesis. Hypothesis testing rests on the premise that the null hypothesis is true and that sufficient evidence must be provided for rejection. In designing the survey plan, the underlying assumption, or null hypothesis was that residual activity in the survey unit exceeded the release criteria. Rejection of the null hypothesis would indicate that residual activity within the survey unit does not exceed the release criteria. Therefore, the survey unit would satisfy the primary objective of the FSS sample plan.

The primary objective of the FSS sample plan is to demonstrate that the level of residual radioactivity in the penetrations that comprised survey unit 05120 did not exceed the



release criteria specified in the LTP and that the potential dose from residual radioactivity is As Low As Reasonably Achievable (ALARA).

ZionSolutions TSD 11-001, "Technical Support Document for Potential Radionuclides of Concern During the Decommissioning of the Zion Station" (Reference 10) established the basis for an initial suite of potential ROC for the decommissioning of the Zion Nuclear Power Station (ZNPS). LTP Chapter 6, section 6.5.2 discusses the process used to derive the ROC for the decommissioning of ZNPS, including the elimination of insignificant dose contributors (IC) from the initial suite. Table 1 presents the ROC for the Auxiliary Building basement structural surfaces and the normalized fractions based on the radionuclide mixture.

Radionuclide	% of Total Activity (normalized) <sup>(1)</sup>
Co-60	0.92
Ni-63	23.71
Sr-90	0.05
Cs-134	0.01
Cs-137	75.32

#### Table 1 - Dose Significant Radionuclides and Mixture

 Based on maximum percent of total activity from Table 20 of TSD 14-019, normalized to one for the dose significant radionuclides.

A fundamental precursor to survey design is to establish a relationship between the release criteria and some measurable quantity. This is done through the development of DCGLs. The DCGLs represent average levels of radioactivity above background levels and are presented in terms of surface or mass activity concentrations. Chapter 6 of the LTP describes in detail the modeling used to develop the DCGLs for penetrations.

The End State Basements are comprised of steel and/or concrete structures which will be covered by at least three feet of clean soil and physically altered to a condition which would not realistically allow the remaining structures, if excavated, to be occupied. The exposure pathways in the Basement Fill Model (BFM) are associated with residual radioactivity in floors and walls that is released through leaching into water contained in the interstitial spaces of the fill material. The BFM assumes that the inventory of residual radioactivity in a given building is released either instantly or over time by diffusion, depending on whether the activity is surficial or volumetric, respectively. The activity released into the fill water will adsorb into the clean fill, as a function of the radionuclidespecific distribution coefficients, resulting in equilibrium concentrations between the fill and the water. Consequently, the only potential exposure pathways after backfill,



assuming the 'as-left' geometry, are associated with the residual radioactivity in the water contained in the fill.

The final outputs of the BFM are the Penetration DCGLs, in units of  $pCi/m^2$ , which are calculated using the BFM Groundwater and BFM Drilling Spoils Dose Factors (LTP Chapter 6, Tables 6-24 and 6-25), LTP Equation 6-10 and the ratios in LTP Table 6-51. The BcDCGL<sub>PN</sub> are radionuclide-specific concentrations that represent the 10 CFR 20.1402 dose criterion of 25 mrem/yr and are calculated for each ROC and each backfilled basement. The "unity rule" is applied when there is more than one ROC. The measurement results for each singular ROC present in the mixture are compared against their respective DCGL to derive a dose fraction.

The  $BcDCGL_{PN}$  for the unrestricted release of the Auxiliary Building penetrations are provided in Table 2. The IC dose percentage of 5% was used to adjust the Auxiliary Building Basement  $DCGL_{PN}$  to account for the dose from the eliminated IC radionuclides.

Each radionuclide-specific BcDCGL<sub>PN</sub> is equivalent to the level of residual radioactivity (above background levels) that could, when considered independently, result in a Total Effective Dose Equivalent (TEDE) of 25 mrem/yr to an Average Member of the Critical Group (AMCG). To ensure that the summation of dose from each source term is 25 mrem/yr or less after all FSS is completed, the BcDCGL<sub>PN</sub> are reduced based on an expected, or *a priori*, fraction of the 25 mrem/yr dose limit from each source term. The reduced DCGL<sub>PN</sub>, or OpDCGL<sub>PN</sub> can be related to the BcDCGL<sub>PN</sub> as an expected fraction of dose based on an *a priori* assessment of what the expected dose should be based on the results of site characterization, process knowledge and the extent of planned remediation. The OpDCGL<sub>PN</sub> is then used as the DCGL for the FSS design of the survey unit (calculation of surrogate DCGLs, investigations levels, etc.). Details of the OpDCGL<sub>PN</sub> derived for each dose component and the basis for the applied *a priori* dose fractions are provided in Zion*Solutions* TSD 17-004, "*Operational Derived Concentration Guideline Levels for Final Status Survey*" (Reference 11).



#### Table 2 - Base Case DCGLs for Penetrations (BcDCGLPN) from LTP Chapter 5, Table 5-13

Radionuclide	Auxiliary Building BcDCGL <sub>PN</sub> (pCi/m <sup>2</sup> )
Co-60	8.82E+07
Ni-63	6.79E+10
Sr-90	2.41E+07
Cs-134	3.28E+08
Cs-137	6.17E+08

The  $OpDCGL_{PN}$  for the unrestricted release of the Auxiliary Basement penetrations are provided in Table 3.

## Table 3 - Auxiliary Building Operational DCGLs for Penetrations (OpDCGLPN)from LTP Chapter 5, Table 5-14

Radionuclide	Operational DCGL (pCi/m <sup>2</sup> )
Co-60	6.95E+06
Ni-63	5.35E+09
Sr-90	1.90E+06
Cs-134	2.58E+07
Cs-137	4.86E+07

Instrument DQOs included a verification of the ability of the survey instrument to detect the radiation(s) of interest relative to the OpDCGL<sub>PN</sub>. Survey instrument response checks were required prior to issuance and after the instrument had been used. Control and accountability of survey instruments was required to assure the quality and prevent the loss of data. The minimum acceptable minimum detectable concentration (MDC) for measurements obtained using field instruments was 50 percent of the applicable OpDCGL<sub>PN</sub>.



#### 5. SURVEY DESIGN

The level of effort associated with planning a survey is based on the complexity of the survey and nature of the hazards. Guidance for preparing FSS plans is provided in procedure ZS-LT-300-001-001 *"Final Status Survey Package Development."* The FSS plans for the survey of penetrations employed sample designs that combined hand-held scanning with static measurements and pipe detector survey methodologies.

The two (2) FSS sample plans for survey unit 05120, "Auxiliary Building Penetrations" includes FSS design and FSS results for the Auxiliary Building penetrations on the 542 foot, 560 foot and the 572 foot elevations. The survey method for large diameter penetrations (>12") differs from smaller penetrations due to measurement sensitivity (i.e., MDCs) differences in the two size regimes. The larger penetrations were surveyed using a similar approach to traditional building surface surveys, whereas the smaller penetrations were surveyed with a single detector advanced through the length in 1-foot increments and centrally positioned. Sample plan #S1-05120A-F #1 addressed the survey of penetrations smaller than 12 inches in diameter (A002, A003, A005, A007-A013, A015, A017 and A019-A023) and sample plan #S1-05120A-F #2 addressed that survey of penetrations with a diameter greater than or equal to 12 inches in diameter (A001, A004, A014, A024 and A025).

Penetrations and buried pipe associated with the west wall of the Auxiliary Building (Unit 1 and Unit 2 Hot Pipe Chases at the 570 foot elevation and buried pipe associated with the SFP) have been physically removed and disposed of as radioactive waste. The penetrations that were removed in its entirety were A006, A016, A018, A029, A034, A037, A038, A039, A040, A041, A042, A043, A044, A046, A047, A048, A049, A050, A052, A053, A054, A055, A056, A057, A058, A059, A060, A061, A063, A064, A065, and A066.

There are twenty-two (22) penetrations that remain in Auxiliary Building that were not attributed to the Containments. The remaining penetrations are located primarily on the "G" Wall between the Auxiliary Building and the Turbine Building.

FSS of the remaining twenty-two (22) penetrations consisted of sixty-six (66) one-minute static measurements, either using a NaI detector or hand-held detector taken at 1-foot intervals throughout the length of the penetrations, providing 100% areal coverage of the pipe interior surface.

Section 5.1 of LTP Chapter 5 states that Co-60, Ni-63, Sr-90, Cs-134, and Cs-137 are the ROC. During FSS, concentrations for Hard-to-Detect (HTD) ROC Ni-63, and Sr-90 are inferred using a surrogate approach. Cs-137 is the principle surrogate radionuclide for Sr-90, and Co-60 is the principle surrogate radionuclide for Ni-63. The mean, maximum



and 95% Upper Confidence Level (UCL) of the surrogate ratios for concrete core samples taken in the Auxiliary Building basements were calculated in ZionSolutions TSD 14-019, "Radionuclides of Concern for Soil and Basement Fill Model Source Terms" (Reference 12) and are presented in Table 4 (reproduced from LTP Chapter 5, Table 5-12). The maximum ratios were used in the surrogate calculations during FSS.

Table 4 - Auxiliary Bullding Surrogate Katios									
Dation	Auxiliary Building								
Ratios	Mean	Max	95%UCL						
Ni-63/Co-60	44.143	180.450	154.632						
Sr-90/Cs-137	0.001	0.002	0.002						

For the FSS of survey unit 05120, the surrogate  $OpDCGL_{PN}$  for Co-60 and Cs-137 were computed based on the maximum ratios from Table 4.

The equation for calculating a surrogate DCGL is as follows:

#### **Equation 1**

$$Surrogate_{DCGL} = \frac{1}{\left[\left(\frac{1}{DCGL_{Sur}}\right) + \left(\frac{R_2}{DCGL_2}\right) + \left(\frac{R_3}{DCGL_3}\right) + \cdots \left(\frac{R_n}{DCGL_n}\right)\right]}$$
  
Where:  $DCGL_{Sur}$  = Surrogate radionuclide DCGL  
 $DCGL_{2,3...n}$  = DCGL for radionuclides to be represented by the surrogate  
 $R_n$  = Ratio of concentration (or nuclide mixture fraction) of

Using the OpDCGL<sub>PN</sub> presented in Table 3 and the maximum ratios from Table 4, the following surrogate calculations were performed:

radionuclide "n" to surrogate radionuclide

#### **Equation 2**

$$Surrogate_{DCGL\ (Cs-137)} = \frac{1}{\left[\left(\frac{1}{4.86E07_{(Cs-137)}}\right) + \left(\frac{0.002}{1.90E06_{(Sr-90)}}\right)\right]} = 4.62E07\ pCi/m^2$$

The surrogate  $OpDCGL_{PN}$  that was used for Cs-137 in this survey unit for direct comparison of sample results to demonstrate compliance is  $4.62E+07 \text{ pCi/m}^2$ .



#### **Equation 3**

$$Surrogate_{DCGL (Co-60)} = \frac{1}{\left[\left(\frac{1}{6.95E06_{(Co-60)}}\right) + \left(\frac{180.45}{5.35E09_{(Ni-63)}}\right)\right]} = 5.63E06 \ pCi/m^2$$

The surrogate  $OpDCGL_{PN}$  that was used for Co-60 in this survey unit for direct comparison of sample results to demonstrate compliance is  $5.63E+06 \text{ pCi/m}^2$ .

The most limiting DCGL was determined to be Co-60  $(5.63E+06 \text{ pCi/m}^2)$  or  $1.25E+05 \text{ dpm}/100 \text{ cm}^2$ . This value was used as the action level for hand-held scan and static measurements and pipe detector static measurements in this survey unit. Action levels in counts per minute (cpm) for pipe detector surveys were calculated using the limiting Co-60 surrogate OpDCGL<sub>PN</sub>, the effective area of detection for the various diameter penetrations, and the associated efficiency for each size penetration. The action levels in cpm for hand-held surveys were calculated using the limiting Co-60 OpDCGL<sub>PN</sub> and the efficiency of the instrument/detector combination. Table 5 provides a summary of the instrumentation and action levels used for the FSS of the penetrations.

Survey Type	Instrument	Detector	Penetration Diameter (in)	Efficiency	Action Level (cpm)
Hand-held	Ludlum 2360	Ludlum 43-93	14-50	0.117 <sup>(1)</sup>	14,600
	Ludlum 2350-1	Ludlum 44-157	6	0.012 <sup>(2)</sup>	32,695
		Luaium 44-157	8	0.009 <sup>(2)</sup>	32,751
Pipe Detector			10	0.018 <sup>(2)</sup>	81,625
		Ludlum 44-162	12	0.016 <sup>(2)</sup>	87,186
			23	0.0142 <sup>(2)</sup>	148,131

 Table 5 - Survey Unit 05120 FSS Instrumentation and Action Levels

Efficiency determined using Tc-99 source. Derived instrument efficiency of 0.144 x source efficiency of 0.81 (NUREG-1507, Table 5.4) = 0.117 (total efficiency)

(2) Efficiency empirically derived using conformable Cs-137 source in various ID pipe jigs

For this Class 1 penetration survey unit, the "Investigation Levels" for area scanning and static measurement results are those levels specified in LTP Chapter 5, Table 5-25 and are reproduced below in Table 6.



Classification	Scan Investigation Levels	Direct Investigation Levels
Class 1	>Operational DCGL or >MDC <sub>scan</sub> if MDC <sub>scan</sub> is greater than Operational DCGL	>Operational DCGL

**Table 6 – Investigation Levels** 

Two (2) survey methodologies were utilized for the FSS of the Auxiliary Building Penetrations, pipe detector survey or hand-held survey. This was due to the varying diameters and lengths of the penetrations. The survey designs for the FSS of Survey Unit 05120 using the different methodologies are detailed below.

The first sample plan required that measurements be collected with a pipe detector. Penetrations included in this plan were twelve (12) inches in diameter or smaller. Seventeen (17) of the twenty-two (22) total penetrations were included in the survey design for pipe detectors. Refer to Table 5 for the FSS instrumentation summary. The total length of the penetrations under the pipe detector methodology is 51 ft. (15.54 m) with a total interior surface area of 6.98 m<sup>2</sup>. As a Class 1 survey unit, the survey design required a 100% areal coverage. For the survey of pipe or penetration internal surfaces that cannot be practically surveyed using a hand-held detector methodology, areal coverage is achieved by the "area of detection" for each static measurement taken. Scanning, in the traditional context, is not applicable to this type of survey. With a 1-foot area of detection, a 1-minute static measurement at 1-foot increments throughout the penetration length was sufficient to provide 100% areal coverage. For 51 feet of penetrations in the survey unit, at least fifty-one (51) measurements were required to satisfy the 100% coverage requirement.

Sample plan #2 required that measurements be collected with a hand-held detector. Penetrations included in sample plan #2 were larger than twelve (12) inches in diameter. Five (5) of the twenty-two (22) total penetrations were included in the survey design for hand-held detectors. Refer to Table 5 for the FSS instrumentation summary. The total length of the penetrations under the hand-held methodology is 15 ft. (4.572 m) with a total interior surface area of 8.90 m<sup>2</sup>. For the survey of these larger diameter pipes, the survey design required 100% scan of the accessible interior surfaces of the penetration. In addition, a minimum of one 1-minute static measurement was acquired in each penetration at systematic locations based on a triangular grid, and at least one 1-minute static measurement was acquired in each penetration at the location of the highest scan result. Seventeen (17) static measurements (15 systematic and 2 QC) were acquired in the large diameter penetrations with the locations selected as denoted in Table 7 below.

Maps of the penetrations and measurement locations are provided in Attachment 1.



Measurement No.	Penetration No.	Inches into Penetration <sup>(1)</sup>
1	A001	12
2	A001	24
3	A001	36
4	A014	12
5	A014	24
6	A014	36
7	A014	36
8	A004	12
9	A004	24
10	A004	36
11	A024	12
12	A024	24
13	A024	36
14	A025	12
15	A025	24
16	A025	36
17	A025	36

#### Table 7 - Systematic Static Locations for Hand-Held Survey

(1) Static measurements were acquired on the bottom of the penetration circumference.

The implementation of quality control measures as referenced by LTP Chapter 5, section 5.9 and Zion*Solutions* ZS-LT-01, "*Quality Assurance Project Plan (for Characterization and FSS)*" (QAPP) (Reference 13) includes the collection of a duplicate measurement on 5% of the measurements taken with the locations selected at random. One (1) measurement out of every twenty (20) was required for QC compliance.

#### 6. SURVEY IMPLEMENTATION

Survey instructions for this FSS were incorporated into and performed in accordance with FSS sample plans #S1-05120AF #1 and #2, which were developed in accordance with Zion*Solutions* procedure ZS-LT-300-001-001, *"Final Status Survey Package Development."* The FSS unit was inspected and controlled in accordance with



ZionSolutions procedure ZS-LT-300-001-003, "Isolation and Control for Final Status Survey" (Reference 14).

Surveys of the Auxiliary Building Penetrations began on March 27, 2018 and concluded on March 28, 2018. The survey design estimated seven (7) working days to implement the FSS in parallel with any required decontamination and inspection activities. In reality, only two (2) working days were necessary to complete this work. Throughout these activities, briefings were conducted on a daily basis to discuss the expectations for job performance and to review the safety aspects of the job.

Visual inspections of the penetrations were performed prior to the start of the survey. Inspections were performed to ensure that the penetrations were relatively dry and free of debris.

For pipe detector surveys using a NaI detector, a background value was determined for the detector/instrument combination to be used prior to deployment. The background value was obtained at the location where the pre-use response check of the instrument was performed. The background value was primarily used to ensure that the detector had not become cross-contaminated by any previous use. Background was not subtracted from any measurement.

Daily, prior to and following use, each detector was subjected to an Operational Response Check in accordance with procedure ZS-LT-300-001-006, "*Radiation Surveys of Pipe Interiors Using Sodium/Cesium Iodide Detectors*" (Reference 15). The Daily Operational Response Check compared the background response to check source ranges established for normal background and detector source response. This check ensured that the detector was working properly.

Once the detector was determined to be fully functional, it was then deployed to the field for insertion into the targeted penetrations. A one-minute static measurement was acquired at each foot traversed into the penetrations. The detector output represented the gamma activity for each one-minute timed measurement in units of gross cpm. The gamma measurement value in units of cpm was then converted to units of dpm using the efficiency factor for the detector applicable to the diameter of the penetration surveyed.

Each measurement assumed a conservative "area of detection" for the NaI detector of one foot. This assumption is conservative because there is additional instrument response from contamination located in the pipe at distances outside of the "area of detection." Consequently, the total activity from the measurement, in units of dpm, is adjusted for the total effective surface area commensurate with the penetration diameter and the assumed "area of detection," resulting in measurement results in units of dpm/100 cm<sup>2</sup>. Using the appropriate conversion factors, the result is then converted to units of pCi/m<sup>2</sup>.



measurement result represents a commensurate and conservative gamma surface activity for the one foot of pipe surface where the measurement was taken.

For the penetration surveys performed with hand-held detectors, a background value was determined for the detector/instrument combination as the average of five (5) ambient 1-minute static measurements. An Alarm Set Point was developed using the background value plus the Action Level dictated in Table 5.

The entire surface area (100%) of the interior surface area of the designated penetrations were scanned using either the Ludlum 2350-1 paired with a pipe detector or a Ludlum 2360 paired with a Ludlum 43-93 detector operated in the rate-meter mode and using audio response. The probe was positioned as close to the surface as possible and was moved at a scan speed of 2.0 inches per second.

Systematic 1-minute static measurements were acquired at the locations denoted in Table 6. Additionally, 1-minute static measurements were taken at the locations of highest scan result in each penetration. Using the established efficiencies (denoted in Table 5), the static measurement activities in cpm were converted to activities in dpm/100 cm<sup>2</sup> and then to pCi/m<sup>2</sup> using the appropriate conversion factor.

#### 7. SURVEY RESULTS

After completion of the FSS measurements in the penetrations, the sample plan was reviewed to confirm the completeness of the survey and the survey data was validated in accordance with procedure ZS-LT-300-001-004, *"Final Status Survey Data Assessment"* (Reference 16). Data processing included converting measurement data into reporting units, validating instrument applicability and sensitivity, calculating relevant statistical quantities, and verification that all DQO have been met.

For measurements acquired with a NaI detector, the gross output of the measurement is converted to units of dpm by dividing by the efficiency. The effective FOV of the measurement is calculated based upon diameter of the pipe at a length of 1 foot. The result, following unit conversion, is a gross gamma measurement result in units of  $pCi/m^2$ .

For measurements acquired as a direct static measurement with a hand-held detector, the gross gamma output of the measurement is again converted to units of dpm by dividing by the efficiency. As the detector has an area of  $100 \text{ cm}^2$ , the units for the measurement are actually in units of dpm/100cm<sup>2</sup>. Again, through unit conversion, units of dpm/100cm<sup>2</sup> are converted to units of pCi/m<sup>2</sup>.

Using the mixture from Table 5-2 of LTP Chapter 5 (reproduced as Table 1 of this Release Record), the gross gamma result from each measurement is multiplied by the



normalized gamma mixture fractions for C-60, Cs-134 and Cs-137 to derive a radionuclide specific concentration for each gamma ROC. The HTD ROC concentrations for Ni-63 and Sr-90 were then inferred using the maximum surrogate ratios from LTP Chapter 5, Table 5-15 (reproduced as Table 4 of this Release Record). Each concentration for each measurement is then compared against the OpDCGL<sub>PN</sub> to produce an OpSOF for each ROC, which were when summed to derive an OpSOF for the measurement.

In accordance with LTP Chapter 5 section 5.5.5, penetration survey units also have total surface areas that are less than the area of the wall/floor surface survey unit that the penetrations interface. To eliminate the potential for activity levels in penetrations that could lead to releases greater than the adjacent basement walls and floors, the results are also compared against the OpDCGL for surfaces from LTP Chapter 5, Table 5-4 of the two building that the penetration interfaces. In the case of the Auxiliary Building penetrations, the OpDCGL<sub>B</sub> for the Turbine Building are the most limiting. Two (2) of the penetrations required grouting as they had measurements with activity greater than the OpDCGL<sub>B</sub> for the Turbine Building. Grouting of the two (2) penetrations was performed prior to backfill and there was no dose reduction attributed to the survey unit because of grouting.

Table 8 provides the summary of Auxiliary Building penetrations, a summary of the FSS results, and whether the penetration required grouting. The complete tables containing the measurement results of all Auxiliary Building measurements that were taken are presented in Attachment 2. The measurement data collected passed the Sign Test. The results of the Sign Test are provided in Attachment 3. The statistical summary of the measurement data taken, when compared against the BcDCGL<sub>PN</sub> for Auxiliary Building penetrations are presented in Table 9.



Don #	Description	Diameter	Length	Area	Mea	surem	ent #	By Direct		Max SOF		Requires
Pen #		(in)	(ft)	$(m^2)$		(2)		Scan	<b>OpDCGL</b> <sub>PN</sub>	<b>BcDCGL</b> <sub>PN</sub>	<b>OpDCGL</b> <sub>B</sub> <sup>(1)</sup>	Grouting
A001	Service Water	24	3	1.75	52	thru	54	Х	0.001	0.001	0.305	No
A002	Feedwater	4.5	3	0.33	10	thru	12		0.012	0.003	0.848	No
A003	Secondary Sample	2.5	3	0.18	13	thru	15		0.033	0.000	0.021	No
A004	Service Water	24	3	1.75	58	thru	60	Х	0.001	0.001	0.250	No
A005	Feedwater	4.5	3	0.33	31	thru	33		0.010	0.001	0.254	No
A007	Aux Vents & Drains	4.5	3	0.33	1	thru	3		0.010	0.001	0.311	No
A008	Aux Vents & Drains	4.5	3	0.33	4	thru	6		0.012	0.001	0.262	No
A009	Waste Disposal	3.5	3	0.26	7	thru	9		0.010	0.002	0.497	No
A010	Service Water	11	3	0.80	49	thru	51		0.020	0.022	7.078	No
A011	Waste Disposal	7	3	0.51	19	thru	21		0.279	0.001	0.346	Yes
A012	Chemical Feed	3.5	3	0.26	22	thru	24		0.014	0.001	0.421	No
A013	Primary Water	4.5	3	0.33	16	thru	18		0.017	0.000	0.020	No
A014	Service Water	20	3	1.46	55	thru	57	Х	0.001	0.001	0.373	No
A015	Waste Disposal	6.5	3	0.47	28	thru	30		0.015	0.002	0.636	No
A017	Fire Protection	11	3	0.80	46	thru	48		0.025	0.001	0.256	No
A019	Primary Water	3.5	3	0.26	25	thru	27		0.010	0.001	0.296	No
A020	Vacuum Control	3.5	3	0.26	34	thru	36		0.012	0.001	0.330	No
A021	Demin Water	3.5	3	0.26	37	thru	39		0.013	0.001	0.298	No
A022	Line with Flange	4.5	3	0.33	40	thru	42		0.012	0.013	4.181	No
A023	Waste Disposal	6.5	3	0.47	43	thru	45		0.165	0.000	0.066	Yes
A024	Condensate	18	3	1.31	61	thru	63	Х	0.003	0.000	0.018	No
A025	Supply Header	36	3	2.63	64	thru	66	Х	0.001	0.001	0.305	No

#### **Table 8 - Auxiliary Building Penetrations Summary**

(1) Compared against the OpDCGL<sub>B</sub> for the Turbine Building from LTP Chapter 5, Table 5-4

(2) Measurement numbers correlates to Attachment 2, "Penetration Survey Data Assessment" Tables



The SOF for all sixty-six (66) measurements, based on the  $OpDCGL_{PN}$ , were less than one (1). The mean OpSOF for Auxiliary Building penetrations was 0.027. The maximum OpSOF for a measurement using  $OpDCGL_{PN}$  for penetrations was 0.279. The data collected passed the Sign Test.

## Table 9 - Auxiliary Building Penetrations FSS Statistics Summary using Auxiliary BuildingBcDCGLPN

Individual Measurement Metrics		
Total Number of Systematic Measurements	=	66
Number of Quality Control Measurements	=	5
Number of Judgmental/Investigational Measurements	=	0
Total Number of Measurements	=	71

Mean Systematic Measurement OpSOF = 0.027

Max Individual Systematic Measurement OpSOF = 0.279

Number of Systematic Measurements with OpSOF > 1 = 0

Nuclide	Mean (pCi/m <sup>2</sup> )			St Dev (pCi/m <sup>2</sup> )	BcDCGL <sub>PN</sub> (pCi/m <sup>2</sup> )	Mean Nuclide BcSOF	
Co-60	1.37E+04	5.47E+03	1.43E+05	2.71E+02	2.93E+04	8.82E+07	0.000
Ni-63	2.48E+06	9.87E+05	2.59E+07	4.88E+04	5.28E+06	6.79E+10	0.000
Sr-90	2.25E+03	8.95E+02	2.35E+04	4.43E+01	4.79E+03	2.41E+07	0.000
Cs-134	1.49E+02	5.94E+01	1.56E+03	2.94E+00	3.18E+02	3.28E+08	0.000
Cs-137	1.12E+06	4.48E+05	1.17E+07	2.22E+04	2.40E+06	6.17E+08	0.002

The mean BcSOF for Auxiliary Building penetrations (survey unit 05120), when compared against the BcDCGL<sub>PN</sub> for Auxiliary Building penetrations is 0.002, which equates to a dose of 0.053 mrem/yr.

The SOF for two (2) measurements, when compared against the  $OpDCGL_B$  for the Turbine Building, were above one (1). In accordance with LTP Chapter 5 section 5.5.5, these two penetrations (A011 and A023) were grouted. No dose reduction was attributed to the survey unit because of grouting.



#### 8. QUALITY CONTROL

In compliance with ZS-LT-01, replicate measurements were performed on 5% of the survey locations chosen at random. Five (5) replicate measurements were taken, which equates to 7.6% of the total number of measurements and satisfies the requirement. Using the acceptance criteria specified in section 4.1.2 of ZS-LT-01, there was acceptable agreement between the replicate readings and the original readings. Refer to Attachment 5 for quality control analysis results.

#### 9. INVESTIGATIONS AND RESULTS

No investigations were performed during the performance or analyses of the FSS.

#### **10. REMEDIATION AND RESULTS**

No radiological remedial action as described by MARSSIM Section 5.4 was performed in this survey unit prior to or as a result of the FSS.

#### 11. CHANGES FROM THE FINAL STATUS SURVEY PLAN

There were no addendums to the FSS plan.

#### 12. DATA QUALITY ASSESSMENT (DQA)

The DQO sample design and data were reviewed in accordance with ZionSolutions procedure ZS-LT-300-001-004, *"Final Status Survey Data Assessment"* for completeness and consistency. Documentation was complete and legible. Surveys and sample collection were consistent with the DQOs and were sufficient to ensure that the survey unit was properly classified.

The analytical results of all samples were less than an OpSOF of one. Although MARSSIM states that the Sign Test need not be performed in the instance that no measurements surpass the DCGL, the test was conducted to demonstrate coherence to the statistical principles of the DQO process. The Sign Test was performed on the data and compared to the original assumptions of the DQOs. The evaluation of the Sign Test results clearly demonstrates that the survey unit passes the unrestricted release criteria, thus, the null hypothesis is rejected.

The preliminary data review consisted of calculating basic statistical quantities (e.g., mean, median, standard deviation). All data was considered valid including negative values, zeros, values reported below the MDC, and values with uncertainties greater than two standard deviations. The mean and median values for each ROC were well below



the respective  $OpDCGL_{PN}$ . Also, a retrospective power curve showed that a sufficient number of samples were collected to achieve the desired power. Therefore, the survey unit meets the unrestricted release criteria with adequate power as required by the DQOs.

The data for Co-60 and Cs-137 is represented graphically through a frequency plot and a quantile plot. All graphical representations are provided in Attachment 6.

#### **13. ANOMALIES**

No anomalies were observed during the performance or analyses of the survey.

#### 14. CONCLUSION

Survey Unit 05120 has met the DQOs of the FSS plan. The ALARA criteria as specified in Chapter 4 of the LTP were achieved. The Elevated Measurement Comparison (EMC) is not applicable to structural surfaces.

All identified ROC were used for statistical testing to determine the adequacy of the survey unit for FSS. Evaluation of the data shows that none of the ROC concentration values exceed the  $OpDCGL_{PN}$  for the Auxiliary Building or any investigational levels; therefore, in accordance with the LTP Section 5.10, the survey unit meets the release criterion.

The sample data passed the Sign Test. The null hypothesis was rejected. The Retrospective Power Curve showed that adequate power was achieved. The survey unit was properly classified as Class 1.

LTP Chapter 6, section 6.4.5 requires that the dose from a penetration be added to each basement that the penetration interfaces with. The penetrations in the Auxiliary Building interface with both Unit 1 and Unit 2 Containments and with the Turbine Building. the penetrations identified as interfacing between the Auxiliary Building and the Unit 1 and Unit 2 Containments were addressed in the Release Records for Unit 1 and Unit 2 Containment Penetrations. In order to comply with the requirements of LTP Chapter 6, section 6.4.5, a dose of 1.468 mrem/yr will be added to the Auxiliary Building and Unit 1 Containment and a dose of 0.206 mrem/yr will be added to the Auxiliary Building basement survey unit from penetrations that interfaced between the Auxiliary Building basement survey unit from penetrations that interfaced between the Auxiliary Building and Unit 1 Containment. The Auxiliary Building penetrations addressed in this Release Record interfaced with the Turbine Building (via the "G" wall and Steam Tunnels). Consequently, a dose value of 0.053 mrem/yr will also be added to the Auxiliary Building basement and the Turbine Building basement.



The null hypothesis was rejected. Therefore, in accordance with the LTP Section 5.10, survey unit 05120 meets the release criterion and is acceptable for unrestricted release.

#### **15. REFERENCES**

- 1. ZionSolutions procedure ZS-LT-300-001-005, Final Status Survey Data Reporting
- 2. Zion Station Restoration Project License Termination Plan
- 3. Zion*Solutions* procedure ZS-LT-300-001-001, Final Status Survey Package Development
- 4. NUREG-1575, Multi-Agency Radiation Survey and Site Investigation Manual
- 5. Zion*Solutions* TSD 14-016, Description of Embedded Piping, Penetrations, and Buried Pipe to Remain in Zion End State
- 6. ZionSolutions procedure ZS-LT-300-001-002, Survey Unit Classification
- 7. Zion Station Historical Site Assessment
- 8. Zion*Solutions* TSD 14-013, Zion Auxiliary Building End State Estimated Concrete Volumes, Surface Areas, and Source Terms
- 9. ZionSolutions procedure ZS-LT-300-001-002, Survey Unit Classification
- 10. Zion*Solutions* TSD 11-001, Technical Support Document for Potential Radionuclides of Concern During the Decommissioning of the Zion Station
- 11. Zion*Solutions* TSD 17-004, Operational Derived Concentration Guideline Levels for Final Status Survey
- 12. Zion*Solutions* TSD 14-019, Radionuclides of Concern for Soil and Basement Fill Model Source Terms
- 13. Zion*Solutions* ZS-LT-01, Quality Assurance Project Plan (for Characterization and FSS)
- 14. Zion*Solutions* procedure ZS-LT-300-001-003, Isolation and Control for Final Status Survey
- 15. Zion*Solutions* procedure ZS-LT-300-001-006, Radiation Surveys of Pipe Interiors Using Sodium/Cesium Iodide Detectors
- 16. ZionSolutions procedure ZS-LT-300-001-004, Final Status Survey Data Assessment



#### **16. ATTACHMENTS**

Attachment 1 – Figures and Maps

Attachment 2 - Measurement Data

Attachment 3 – Sign Test

Attachment 4 - QC Data

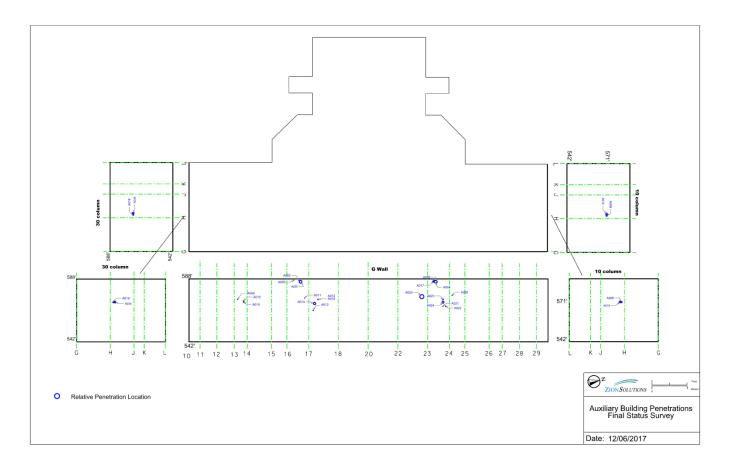
Attachment 5 – QC Measurement Assessments

Attachment 6 – Graphical Presentations

# **ATTACHMENT 1** FIGURES AND MAPS



### **Figure 1 – Overall Penetration Map**



# **ATTACHMENT 2** MEASUREMENT DATA



		<b>Co-60</b>	Ni-63	Sr-90	Cs-134	<b>Cs-137</b>	
MEASU	REMENT ID	$(pCi/m^2)$	$(pCi/m^2)$	(pCi/m <sup>2</sup> )	$(pCi/m^2)$	$(pCi/m^2)$	<b>OpSOF</b> <sup>(1)</sup>
A007	Position#1	4.84E+03	8.74E+05	7.93E+02	5.27E+01	3.97E+05	0.0094
A007	Position#2	4.96E+03	8.96E+05	8.13E+02	5.40E+01	4.06E+05	0.0097
A007	Position#3	5.15E+03	9.30E+05	8.44E+02	5.60E+01	4.22E+05	0.0100
A008	Position#1	6.29E+03	1.14E+06	1.03E+03	6.84E+01	5.15E+05	0.0100
A008	Position#2	5.76E+03	1.04E+06	9.43E+02	6.26E+01	4.72E+05	0.0123
A008	Position#3	5.70E+03	1.04E+00	9.33E+02	6.20E+01	4.67E+05	0.0112
A009	Position#1	5.30E+03	9.56E+05	8.67E+02	5.76E+01	4.34E+05	0.0103
A009	Position#2	5.17E+03	9.30E+05	8.46E+02	5.61E+01	4.23E+05	0.0103
A009	Position#3	5.28E+03	9.54E+05	8.65E+02	5.74E+01	4.33E+05	0.0103
A002	Position#1	5.21E+03	9.41E+05	8.54E+02	5.67E+01	4.27E+05	0.0103
A002	Position#2	4.92E+03	8.87E+05	8.05E+02	5.34E+01	4.02E+05	0.0096
A002	Position#3	6.19E+03	1.12E+06	1.01E+02	6.72E+01	5.06E+05	0.0121
A003	Position#1	6.82E+03	1.23E+06	1.12E+03	7.41E+01	5.58E+05	0.0121
A003	Position#2	7.39E+03	1.33E+06	1.21E+03	8.03E+01	6.05E+05	0.0133
A003	Position#3	1.72E+04	3.10E+06	2.81E+03	1.87E+02	1.41E+06	0.0335
A013	Position#1	7.93E+03	1.43E+06	1.30E+03	8.62E+01	6.49E+05	0.0155
A013	Position#2	8.30E+03	1.50E+06	1.36E+03	9.02E+01	6.80E+05	0.0162
A013	Position#3	8.53E+03	1.54E+06	1.40E+03	9.27E+01	6.98E+05	0.0162
A011	Position#1	1.25E+05	2.25E+07	2.04E+04	1.35E+03	1.02E+07	0.2427
A011	Position#2	1.43E+05	2.59E+07	2.35E+04	1.56E+03	1.17E+07	0.2794
A011	Position#3	1.21E+05	2.18E+07	1.98E+04	1.31E+03	9.88E+06	0.2352
A012	Position#1	5.44E+03	9.81E+05	8.91E+02	5.91E+01	4.45E+05	0.0106
A012	Position#2	5.50E+03	9.92E+05	9.00E+02	5.98E+01	4.50E+05	0.0107
A012	Position#3	7.01E+03	1.26E+06	1.15E+03	7.62E+01	5.74E+05	0.0137
A012 A019	Position#1	4.75E+03	8.57E+05	7.78E+02	5.16E+01	3.89E+05	0.0093
A017	1 05111011#1	T. / JE + 05	0.5712+05	1.101-02	5.100 01	5.671 105	0.0095

#### **Auxiliary Building Penetration Summary**

AU19POSITION#14./5E+038.5/E+05/./8E+02(1)Compared against the OpDCGL<sub>PN</sub> for the Auxiliary Building from LTP Chapter 5, Table 5-14



		C- (0		G 00	C- 124	C. 127	
MEAS	UREMENT ID	$\begin{array}{c} \text{Co-60} \\ (-C^2/m^2) \end{array}$	Ni-63	$\frac{\text{Sr-90}}{(770)^2}$	Cs-134	Cs-137	<b>OpSOF</b> <sup>(1)</sup>
4.010	<b>D</b> = =: <b>t</b> <sup>1</sup> = ==#2	$(pCi/m^2)$	$(pCi/m^2)$	$\frac{\text{(pCi/m}^2)}{7.74\text{E}+02}$	$(pCi/m^2)$	$\frac{\text{(pCi/m^2)}}{2.87E+0.5}$	0.0002
A019	Position#2	4.73E+03	8.53E+05	7.74E+02	5.14E+01	3.87E+05	0.0092
A019	Position#3	5.18E+03	9.34E+05	8.48E+02	5.63E+01	4.24E+05	0.0101
A015	Position#1	6.64E+03	1.20E+06	1.09E+03	7.22E+01	5.44E+05	0.0129
A015	Position#2	6.59E+03	1.19E+06	1.08E+03	7.16E+01	5.40E+05	0.0128
A015	Position#3	7.55E+03	1.36E+06	1.24E+03	8.21E+01	6.18E+05	0.0147
A005	Position#1	4.51E+03	8.14E+05	7.39E+02	4.90E+01	3.69E+05	0.0088
A005	Position#2	4.50E+03	8.12E+05	7.37E+02	4.89E+01	3.68E+05	0.0088
A005	Position#3	5.07E+03	9.15E+05	8.30E+02	5.51E+01	4.15E+05	0.0099
A020	Position#1	5.13E+03	9.26E+05	8.40E+02	5.58E+01	4.20E+05	0.0100
A020	Position#2	5.98E+03	1.08E+06	9.80E+02	6.51E+01	4.90E+05	0.0117
A020	Position#3	5.95E+03	1.07E+06	9.74E+02	6.47E+01	4.87E+05	0.0116
A021	Position#1	6.67E+03	1.20E+06	1.09E+03	7.25E+01	5.46E+05	0.0130
A021	Position#2	5.59E+03	1.01E+06	9.16E+02	6.08E+01	4.58E+05	0.0109
A021	Position#3	5.63E+03	1.02E+06	9.22E+02	6.12E+01	4.61E+05	0.0110
A022	Position#1	4.44E+03	8.01E+05	7.27E+02	4.83E+01	3.64E+05	0.0087
A022	Position#2	4.46E+03	8.06E+05	7.31E+02	4.85E+01	3.66E+05	0.0087
A022	Position#3	6.03E+03	1.09E+06	9.88E+02	6.56E+01	4.94E+05	0.0118
A023	Position#1	6.23E+04	1.12E+07	1.02E+04	6.77E+02	5.10E+06	0.1214
A023	Position#2	8.47E+04	1.53E+07	1.39E+04	9.20E+02	6.93E+06	0.1650
A023	Position#3	6.52E+04	1.18E+07	1.07E+04	7.09E+02	5.34E+06	0.1270
A017	Position#1	9.91E+03	1.79E+06	1.62E+03	1.08E+02	8.11E+05	0.0193
A017	Position#2	1.07E+04	1.93E+06	1.75E+03	1.16E+02	8.74E+05	0.0208
A017	Position#3	1.29E+04	2.32E+06	2.11E+03	1.40E+02	1.05E+06	0.0251
A010	Position#1	8.41E+03	1.52E+06	1.38E+03	9.14E+01	6.89E+05	0.0164
A010	Position#2	8.59E+03	1.55E+06	1.41E+03	9.33E+01	7.03E+05	0.0167

#### Auxiliary Building Penetration Summary (continued)

(1) Compared against the OpDCGL<sub>PN</sub> for the Auxiliary Building from LTP Chapter 5, Table 5-14



MEASUREMENT ID		Co-60 (pCi/m <sup>2</sup> )	Ni-63 (pCi/m <sup>2</sup> )	Sr-90 (pCi/m <sup>2</sup> )	Cs-134 (pCi/m <sup>2</sup> )	Cs-137 (pCi/m <sup>2</sup> )	<b>OpSOF</b> <sup>(1)</sup>
A010	Position#3	1.01E+04	1.82E+06	1.65E+03	1.10E+02	8.25E+05	0.0196
A001	Position #1	4.20E+02	7.59E+04	6.88E+01	4.57E+00	3.44E+04	0.0008
A001	Position #2	4.61E+02	8.33E+04	7.56E+01	5.02E+00	3.78E+04	0.0009
A001	Position #3	4.37E+02	7.89E+04	7.16E+01	4.75E+00	3.58E+04	0.0009
A014	Position #1	2.71E+02	4.88E+04	4.43E+01	2.94E+00	2.22E+04	0.0005
A014	Position #2	3.53E+02	6.36E+04	5.78E+01	3.83E+00	2.89E+04	0.0007
A014	Position #3	4.06E+02	7.32E+04	6.65E+01	4.41E+00	3.32E+04	0.0008
A004	Position #1	3.79E+02	6.84E+04	6.21E+01	4.12E+00	3.11E+04	0.0007
A004	Position #2	3.38E+02	6.10E+04	5.54E+01	3.68E+00	2.77E+04	0.0007
A004	Position #3	4.32E+02	7.80E+04	7.08E+01	4.70E+00	3.54E+04	0.0008
A024	Position #1	4.49E+02	8.11E+04	7.36E+01	4.88E+00	3.68E+04	0.0009
A024	Position #2	7.61E+02	1.37E+05	1.25E+02	8.27E+00	6.23E+04	0.0015
A024	Position #3	1.34E+03	2.42E+05	2.20E+02	1.46E+01	1.10E+05	0.0026
A025	Position #1	3.31E+02	5.97E+04	5.42E+01	3.60E+00	2.71E+04	0.0006
A025	Position #2	3.14E+02	5.67E+04	5.14E+01	3.41E+00	2.57E+04	0.0006
A025	Position #3	3.55E+02	6.41E+04	5.81E+01	3.86E+00	2.91E+04	0.0007

#### Auxiliary Building Penetration Summary (continued)

(1) Compared against the OpDCGL<sub>PN</sub> for the Auxiliary Building from LTP Chapter 5, Table 5-14



Instrument/ID	Cal. Due	Detector/ID	Cal. Due	Efficiency	Survey Date	Penetration	Reading (cpm)	Reading (dpm/100cm <sup>2</sup> )	Reading (pCi/m <sup>2</sup> )
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A001	174	870	3.48E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A001	191	955	3.82E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A001	181	905	3.62E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A014	112	560	2.24E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A014	146	730	2.92E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A014	168	840	3.36E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A014 QC	145	725	2.90E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A004	157	785	3.14E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A004	140	700	2.80E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A004	179	895	3.58E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A024	186	930	3.72E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A024	315	1575	6.31E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A024	555	2775	1.11E+05
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A025	137	685	2.74E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A025	130	650	2.60E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A025	147	735	2.94E+04
2360/278576	1/27/2019	43-93/PR311187	1/27/2019	0.20	3/28/2018	A025 QC	120	600	2.40E+04

#### Auxiliary Building Penetration Scan Measurements for Large Diameter Penetrations (>12 inches ID)



### Penetration Survey Data Assessment

		Feet	Gamma		Gamma	Activity	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Turbine	Turbine	Turbine
No.	Sample ID	into	Result	ROC	Mixture/	per ROC	OpDCGL <sub>PN</sub>	ROC	Total	BcDCGL <sub>PN</sub>	ROC	Total	OpDCGL <sub>B</sub>	ROC	Total
1	A007 D 11 11	Pipe	$(pCi/m^2)$	G (0	HTD Ratio	$(pCi/m^2)$	$(pCi/m^2)$	OpSOF <sub>PN</sub>	<b>OpSOF</b> <sub>PN</sub> 0.0094	$(pCi/m^2)$	BcSOF <sub>PN</sub>	BcSOF <sub>PN</sub>	(pCi/m <sup>2</sup> )	OpSOF <sub>B</sub>	OpSOF <sub>B</sub>
1	A007 Position#1	1	4.02E+05	Co-60 Ni-63	0.0121 180	4.84E+03 8.74E+05	6.95E+06 5.35E+09	0.0007	0.0094	8.82E+07 6.79E+10	0.0001	0.0007	5.98E+06 1.85E+08	0.0008	0.2392
				Sr-90	0.002	8.74E+05 7.93E+02	3.33E+09 1.90E+06	0.0002		6.79E+10 2.41E+07	0.0000	-			
									-				6.58E+04	0.0121	
				Cs-134	0.0001	5.27E+01	2.58E+07	0.0000	-	3.28E+08	0.0000		1.35E+06	0.0000	
	A007 D	2	4.115+05	Cs-137	0.9878	3.97E+05	4.86E+07	0.0082	0.0007	6.17E+08	0.0006	0.0000	1.79E+06	0.2216	0.2451
2	A007 Position#2	2	4.11E+05	Co-60	0.0121	4.96E+03	6.95E+06	0.0007	0.0097	8.82E+07	0.0001	0.0008	5.98E+06	0.0008	0.2451
				Ni-63 Sr-90	180 0.002	8.96E+05	5.35E+09	0.0002		6.79E+10 2.41E+07	0.0000		1.85E+08	0.0048	
						8.13E+02	1.90E+06						6.58E+04	0.0124	
				Cs-134	0.0001	5.40E+01	2.58E+07	0.0000		3.28E+08	0.0000 0.0007		1.35E+06	0.0000	
2	1007 D 11 112	2	4.275 - 0.5	Cs-137	0.9878	4.06E+05	4.86E+07	0.0084	0.0100	6.17E+08		0.0000	1.79E+06	0.2270	0.0545
3	A007 Position#3	3	4.27E+05	Co-60	0.0121	5.15E+03	6.95E+06	0.0007	0.0100	8.82E+07	0.0001	0.0008	5.98E+06	0.0009	0.2545
				Ni-63	180	9.30E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0050	
				Sr-90	0.002	8.44E+02	1.90E+06	0.0004		2.41E+07	0.0000		6.58E+04	0.0128	
				Cs-134	0.0001	5.60E+01	2.58E+07	0.0000	-	3.28E+08	0.0000	-	1.35E+06	0.0000	
				Cs-137	0.9878	4.22E+05	4.86E+07	0.0087		6.17E+08	0.0007		1.79E+06	0.2357	
4	A008 Position#1	1	5.22E+05	Co-60	0.0121	6.29E+03	6.95E+06	0.0009	0.0123	8.82E+07	0.0001	0.0010	5.98E+06	0.0011	0.3108
				Ni-63	180	1.14E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0061	
				Sr-90	0.002	1.03E+03	1.90E+06	0.0005		2.41E+07	0.0000	-	6.58E+04	0.0157	
				Cs-134	0.0001	6.84E+01	2.58E+07	0.0000		3.28E+08	0.0000	-	1.35E+06	0.0001	
				Cs-137	0.9878	5.15E+05	4.86E+07	0.0106		6.17E+08	0.0008		1.79E+06	0.2878	
5	A008 Position#2	2	4.77E+05	Co-60	0.0121	5.76E+03	6.95E+06	0.0008	0.0112	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.2844
				Ni-63	180	1.04E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0056	
				Sr-90	0.002	9.43E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0143	
				Cs-134	0.0001	6.26E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.72E+05	4.86E+07	0.0097		6.17E+08	0.0008		1.79E+06	0.2634	
6	A008 Position#3	3	4.72E+05	Co-60	0.0121	5.70E+03	6.95E+06	0.0008	0.0111	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.2814
				Ni-63	180	1.03E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0056	
				Sr-90	0.002	9.33E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0142	
				Cs-134	0.0001	6.20E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.67E+05	4.86E+07	0.0096		6.17E+08	0.0008		1.79E+06	0.2607	
7	A009 Position#1	1	4.39E+05	Co-60	0.0121	5.30E+03	6.95E+06	0.0008	0.0103	8.82E+07	0.0001	0.0008	5.98E+06	0.0009	0.2615
				Ni-63	180	9.56E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0052	
				Sr-90	0.002	8.67E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0132	
				Cs-134	0.0001	5.76E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.34E+05	4.86E+07	0.0089		6.17E+08	0.0007		1.79E+06	0.2422	
8	A009 Position#2	2	4.28E+05	Co-60	0.0121	5.17E+03	6.95E+06	0.0007	0.0101	8.82E+07	0.0001	0.0008	5.98E+06	0.0009	0.2551
				Ni-63	180	9.32E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0050	
				Sr-90	0.002	8.46E+02	1.90E+06	0.0004		2.41E+07	0.0000		6.58E+04	0.0129	
				Cs-134	0.0001	5.61E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.23E+05	4.86E+07	0.0087		6.17E+08	0.0007		1.79E+06	0.2363	



#### Penetration Survey Data Assessment (continued)

		Feet	Gamma		Gamma	Activity	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Turbine	Turbine	Turbine
No.	Sample ID	into	Result	ROC	Mixture/	per ROC	OpDCGL <sub>PN</sub>	ROC	Total	BcDCGL <sub>PN</sub>	ROC	Total	OpDCGL <sub>B</sub>	ROC	Total
9	A009 Position#3	Pipe 3	(pCi/m <sup>2</sup> ) 4.38E+05	Co-60	HTD Ratio 0.0121	(pCi/m <sup>2</sup> ) 5.28E+03	(pCi/m <sup>2</sup> ) 6.95E+06	<b>OpSOF</b> <sub>PN</sub> 0.0008	<b>OpSOF</b> <sub>PN</sub> 0.0103	(pCi/m <sup>2</sup> ) 8.82E+07	BcSOF <sub>PN</sub> 0.0001	BcSOF <sub>PN</sub> 0.0008	(pCi/m <sup>2</sup> ) 5.98E+06	<b>ОрSOF</b> <sub>в</sub> 0.0009	ОрSOF <sub>в</sub> 0.2609
9	A009 Position#5	3	4.38E+05	Ni-63	180	9.54E+05	6.95E+06 5.35E+09	0.0008	0.0103		0.0001	0.0008	3.98E+06 1.85E+08	0.0009	0.2609
				Sr-90	0.002	9.54E+05 8.65E+02	5.55E+09 1.90E+06	0.0002		6.79E+10 2.41E+07	0.0000	-		0.0032	
					0.002	8.63E+02 5.74E+01	2.58E+07	0.0005			0.0000	-	6.58E+04 1.35E+06	0.0131	
				Cs-134 Cs-137	0.0001	4.33E+05	2.38E+07 4.86E+07	0.0000		3.28E+08 6.17E+08	0.0007	-	1.33E+06 1.79E+06	0.0000	
10	A002 Position#1	1	4.32E+05	Co-60	0.9878	4.33E+03 5.21E+03	4.80E+07 6.95E+06	0.0089	0.0102	8.82E+07	0.0007	0.0008	5.98E+06	0.2417	0.2574
10	A002 FOSITIOII#1	1	4.52E+05	Ni-63	180	9.41E+05	5.35E+00	0.0008	0.0102	6.79E+10	0.0001	0.0008	1.85E+08	0.0009	0.2374
				Sr-90	0.002	8.54E+02	1.90E+06	0.0002		2.41E+07	0.0000		6.58E+04	0.0031	
				Cs-134	0.002	5.67E+01	2.58E+07	0.0004		3.28E+08	0.0000		0.38E+04 1.35E+06	0.0000	
				Cs-134 Cs-137	0.9878	4.27E+05	4.86E+07	0.0000		6.17E+08	0.0007		1.33E+00 1.79E+06	0.2384	
11	A002 Position#2	2	4.07E+05	Co-60	0.9878	4.27E+03	6.95E+06	0.0007	0.0096	8.82E+07	0.0007	0.0008	5.98E+06	0.2384	0.2427
11	A002 FOSITION#2	2	4.07E+05	Ni-63	180	4.92E+03 8.87E+05	5.35E+00	0.0007	0.0090	6.79E+10	0.0001	0.0008	1.85E+08	0.0008	0.2427
				Sr-90	0.002	8.05E+02	1.90E+09	0.0002		2.41E+07	0.0000		6.58E+04	0.0048	
				Cs-134	0.0002	5.34E+01	2.58E+07	0.0004		3.28E+08	0.0000		1.35E+04	0.0000	
				Cs-137	0.9878	4.02E+05	4.86E+07	0.0083		6.17E+08	0.0007		1.79E+06	0.2248	
12	A002 Position#3	3	5.13E+05	Co-60	0.0121	6.19E+03	6.95E+06	0.0009	0.0121	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.3055
12	1002 1001001.5	5	5.152.05	Ni-63	180	1.12E+06	5.35E+09	0.0002	0.0121	6.79E+10	0.0000	0.0009	1.85E+08	0.0060	0.5055
				Sr-90	0.002	1.01E+03	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0154	
				Cs-134	0.0001	6.72E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	5.06E+05	4.86E+07	0.0104		6.17E+08	0.0008		1.79E+06	0.2830	
13	A003 Position#1	1	5.65E+05	Co-60	0.0121	6.82E+03	6.95E+06	0.0010	0.0133	8.82E+07	0.0001	0.0010	5.98E+06	0.0011	0.3365
				Ni-63	180	1.23E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0066	
				Sr-90	0.002	1.12E+03	1.90E+06	0.0006		2.41E+07	0.0000		6.58E+04	0.0170	
				Cs-134	0.0001	7.41E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	5.58E+05	4.86E+07	0.0115		6.17E+08	0.0009		1.79E+06	0.3117	
14	A003 Position#2	2	6.12E+05	Co-60	0.0121	7.39E+03	6.95E+06	0.0011	0.0144	8.82E+07	0.0001	0.0011	5.98E+06	0.0012	0.3647
				Ni-63	180	1.33E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0072	
				Sr-90	0.002	1.21E+03	1.90E+06	0.0006		2.41E+07	0.0001		6.58E+04	0.0184	
				Cs-134	0.0001	8.03E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	6.05E+05	4.86E+07	0.0124		6.17E+08	0.0010		1.79E+06	0.3378	
15	A003 Position#3	3	1.42E+06	Co-60	0.0121	1.72E+04	6.95E+06	0.0025	0.0335	8.82E+07	0.0002	0.0026	5.98E+06	0.0029	0.8484
				Ni-63	180	3.10E+06	5.35E+09	0.0006	]	6.79E+10	0.0000		1.85E+08	0.0168	
				Sr-90	0.002	2.81E+03	1.90E+06	0.0015		2.41E+07	0.0001		6.58E+04	0.0428	
				Cs-134	0.0001	1.87E+02	2.58E+07	0.0000	]	3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	1.41E+06	4.86E+07	0.0289		6.17E+08	0.0023		1.79E+06	0.7859	

Cs-137

0.9878

4.45E+05



							v			,					
No.	Sample ID	Feet into Pipe	Gamma Result (pCi/m <sup>2</sup> )	ROC	Gamma Mixture/ HTD Ratio	Activity per ROC (pCi/m <sup>2</sup> )	Auxiliary OpDCGL <sub>PN</sub> (pCi/m <sup>2</sup> )	Auxiliary ROC OpSOF <sub>PN</sub>	Auxiliary Total OpSOF <sub>PN</sub>	Auxiliary BcDCGL <sub>PN</sub> (pCi/m <sup>2</sup> )	Auxiliary ROC BcSOF <sub>PN</sub>	Auxiliary Total BcSOF <sub>PN</sub>	Turbine OpDCGL <sub>B</sub> (pCi/m <sup>2</sup> )	Turbine ROC OpSOF <sub>B</sub>	Turbine Total OpSOF <sub>B</sub>
16	A013 Position#1	1	6.57E+05	Co-60	0.0121	7.93E+03	6.95E+06	0.0011	0.0155	8.82E+07	0.0001	0.0012	5.98E+06	0.0013	0.3917
				Ni-63	180	1.43E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0077	
				Sr-90	0.002	1.30E+03	1.90E+06	0.0007		2.41E+07	0.0001		6.58E+04	0.0197	
				Cs-134	0.0001	8.62E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	6.49E+05	4.86E+07	0.0134		6.17E+08	0.0011		1.79E+06	0.3628	
17	A013 Position#2	2	6.88E+05	Co-60	0.0121	8.30E+03	6.95E+06	0.0012	0.0162	8.82E+07	0.0001	0.0013	5.98E+06	0.0014	0.4098
				Ni-63	180	1.50E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0081	
				Sr-90	0.002	1.36E+03	1.90E+06	0.0007		2.41E+07	0.0001		6.58E+04	0.0207	
				Cs-134	0.0001	9.02E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	6.80E+05	4.86E+07	0.0140		6.17E+08	0.0011		1.79E+06	0.3796	
18	A013 Position#3	3	7.07E+05	Co-60	0.0121	8.53E+03	6.95E+06	0.0012	0.0166	8.82E+07	0.0001	0.0013	5.98E+06	0.0014	0.4210
				Ni-63	180	1.54E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0083	
				Sr-90	0.002	1.40E+03	1.90E+06	0.0007		2.41E+07	0.0001		6.58E+04	0.0212	
				Cs-134	0.0001	9.27E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	6.98E+05	4.86E+07	0.0144		6.17E+08	0.0011		1.79E+06	0.3900	
19	A011 Position#1	1	1.03E+07	Co-60	0.0121	1.25E+05	6.95E+06	0.0179	0.2427	8.82E+07	0.0014	0.0191	5.98E+06	0.0208	6.1494
				Ni-63	180	2.25E+07	5.35E+09	0.0042		6.79E+10	0.0003		1.85E+08	0.1215	
				Sr-90	0.002	2.04E+04	1.90E+06	0.0107		2.41E+07	0.0008		6.58E+04	0.3099	
				Cs-134	0.0001	1.35E+03	2.58E+07	0.0001		3.28E+08	0.0000		1.35E+06	0.0010	
				Cs-137	0.9878	1.02E+07	4.86E+07	0.2098		6.17E+08	0.0165		1.79E+06	5.6961	
20	A011 Position#2	2	1.19E+07	Co-60	0.0121	1.43E+05	6.95E+06	0.0206	0.2794	8.82E+07	0.0016	0.0220	5.98E+06	0.0240	7.0781
				Ni-63	180	2.59E+07	5.35E+09	0.0048		6.79E+10	0.0004		1.85E+08	0.1398	
				Sr-90	0.002	2.35E+04	1.90E+06	0.0124		2.41E+07	0.0010		6.58E+04	0.3567	
				Cs-134	0.0001	1.56E+03	2.58E+07	0.0001		3.28E+08	0.0000		1.35E+06	0.0012	
				Cs-137	0.9878	1.17E+07	4.86E+07	0.2415		6.17E+08	0.0190		1.79E+06	6.5564	
21	A011 Position#3	3	1.00E+07	Co-60	0.0121	1.21E+05	6.95E+06	0.0174	0.2352	8.82E+07	0.0014	0.0185	5.98E+06	0.0202	5.9582
				Ni-63	180	2.18E+07	5.35E+09	0.0041		6.79E+10	0.0003		1.85E+08	0.1177	
				Sr-90	0.002	1.98E+04	1.90E+06	0.0104		2.41E+07	0.0008	1	6.58E+04	0.3003	
				Cs-134	0.0001	1.31E+03	2.58E+07	0.0001		3.28E+08	0.0000		1.35E+06	0.0010	
				Cs-137	0.9878	9.88E+06	4.86E+07	0.2033	]	6.17E+08	0.0160		1.79E+06	5.5191	]
22	A012 Position#1	1	4.51E+05	Co-60	0.0121	5.44E+03	6.95E+06	0.0008	0.0106	8.82E+07	0.0001	0.0008	5.98E+06	0.0009	0.2685
				Ni-63	180	9.81E+05	5.35E+09	0.0002	]	6.79E+10	0.0000		1.85E+08	0.0053	
				Sr-90	0.002	8.91E+02	1.90E+06	0.0005	]	2.41E+07	0.0000		6.58E+04	0.0135	
				Cs-134	0.0001	5.91E+01	2.58E+07	0.0000	1	3.28E+08	0.0000	1	1.35E+06	0.0000	1
	1	1		C- 127	0.0070	4.45 - 05	4.9(E+07	0.0002	1	(17E+0.0)	0.0007	1	1.70E+06	0 2407	1

### Penetration Survey Data Assessment (continued)

4.86E+07

0.0092

6.17E+08

0.0007

1.79E+06

0.2487

No.

23

24

25



#### Activity Auxiliary Feet Gamma Gamma Auxiliary Auxiliary Auxiliary Auxiliary Auxiliary Turbine Turbine Turbine Sample ID into Result ROC Mixture/ per ROC **OpDCGL**<sub>PN</sub> ROC Total **BcDCGL**<sub>PN</sub> ROC Total **OpDCGL**<sub>R</sub> ROC Total $(pCi/m^2)$ (pCi/m<sup>2</sup>) **OpSOF**<sub>PN</sub> Pipe (pCi/m<sup>2</sup>) **HTD Ratio OpSOF**<sub>PN</sub> $(pCi/m^2)$ **BcSOF**<sub>PN</sub> **BcSOF**<sub>PN</sub> $(pCi/m^2)$ **OpSOF**<sub>B</sub> **OpSOF**<sub>B</sub> 0.0121 5.50E+03 6.95E+06 0.0008 0.0001 0.0008 5.98E+06 0.0009 A012 Position#2 2 4.56E+05 Co-60 0.0107 8.82E+07 0.2715 Ni-63 180 9.92E+05 5.35E+09 0.0002 6.79E+10 0.0000 1.85E+08 0.0054 Sr-90 0.002 9.00E+02 1.90E+06 0.0005 2.41E+07 0.0000 6.58E+04 0.0137 0.0000 Cs-134 0.0001 5.98E+01 2.58E+07 0.0000 3.28E+08 0.0000 1.35E+06 Cs-137 0.9878 4.50E+05 4.86E+07 0.0093 6.17E+08 0.0007 1.79E+06 0.2515 A012 Position#3 3 5.81E+05 Co-60 0.0121 7.01E+03 6.95E+06 0.0010 0.0137 8.82E+07 0.0001 0.0011 5.98E+06 0.0012 0.3459 Ni-63 180 1.26E+06 5.35E+09 0.0002 6.79E+10 0.0000 1.85E+08 0.0068 Sr-90 0.002 1.15E+03 1.90E+06 0.0006 2.41E+07 0.0000 6.58E+04 0.0174 0.0001 0.0000 0.0000 0.0001 Cs-134 7.62E+01 2.58E+07 3.28E+08 1.35E+06 Cs-137 0.9878 5.74E+05 4.86E+07 0.0118 6.17E+08 0.0009 1.79E+06 0.3204 A019 Position#1 3.94E+05 Co-60 0.0121 4.75E+03 6.95E+06 0.0007 0.0093 8.82E+07 0.0001 0.0007 5.98E+06 0.0008 0.2345 1 Ni-63 8.57E+05 5.35E+09 0.0002 0.0000 1.85E+08 0.0046 180 6.79E+10 Sr-90 0.002 7.78E+02 1.90E+06 0.0004 2.41E+07 0.0000 6.58E+04 0.0118 Cs-134 0.0001 5.16E+01 2.58E+07 0.0000 3.28E+08 0.0000 1.35E+06 0.0000 Cs-137 0.9878 3.89E+05 4.86E+07 0.0080 6.17E+08 0.0006 1.79E+06 0.2172

#### **Penetration Survey Data Assessment (continued)**

					03-157	0.9070	3.07L+03	4.00L+07	0.0000		0.171.00	0.0000		1.771.00	0.2172	
26	A019	Position#2	2	3.92E+05	Co-60	0.0121	4.73E+03	6.95E+06	0.0007	0.0092	8.82E+07	0.0001	0.0007	5.98E+06	0.0008	0.2334
					Ni-63	180	8.53E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0046	
					Sr-90	0.002	7.74E+02	1.90E+06	0.0004	1	2.41E+07	0.0000	1	6.58E+04	0.0118	
					Cs-134	0.0001	5.14E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	3.87E+05	4.86E+07	0.0080		6.17E+08	0.0006		1.79E+06	0.2162	
27	A019	Position#3	3	4.29E+05	Co-60	0.0121	5.18E+03	6.95E+06	0.0007	0.0101	8.82E+07	0.0001	0.0008	5.98E+06	0.0009	0.2556
					Ni-63	180	9.34E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0050	
					Sr-90	0.002	8.48E+02	1.90E+06	0.0004		2.41E+07	0.0000		6.58E+04	0.0129	
					Cs-134	0.0001	5.63E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	4.24E+05	4.86E+07	0.0087		6.17E+08	0.0007		1.79E+06	0.2368	
28	A015	Position#1	1	5.50E+05	Co-60	0.0121	6.64E+03	6.95E+06	0.0010	0.0129	8.82E+07	0.0001	0.0010	5.98E+06	0.0011	0.3278
					Ni-63	180	1.20E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0065	
					Sr-90	0.002	1.09E+03	1.90E+06	0.0006		2.41E+07	0.0000		6.58E+04	0.0165	
					Cs-134	0.0001	7.22E+01	2.58E+07	0.0000	1	3.28E+08	0.0000	1	1.35E+06	0.0001	
					Cs-137	0.9878	5.44E+05	4.86E+07	0.0112	1	6.17E+08	0.0009	1	1.79E+06	0.3037	
29	A015	Position#2	2	5.46E+05	Co-60	0.0121	6.59E+03	6.95E+06	0.0009	0.0128	8.82E+07	0.0001	0.0010	5.98E+06	0.0011	0.3255
					Ni-63	180	1.19E+06	5.35E+09	0.0002	1	6.79E+10	0.0000	1	1.85E+08	0.0064	
					Sr-90	0.002	1.08E+03	1.90E+06	0.0006	1	2.41E+07	0.0000	1	6.58E+04	0.0164	
					Cs-134	0.0001	7.16E+01	2.58E+07	0.0000	1	3.28E+08	0.0000	1	1.35E+06	0.0001	
					Cs-137	0.9878	5.40E+05	4.86E+07	0.0111		6.17E+08	0.0009		1.79E+06	0.3015	
30	A015	Position#3	3	6.26E+05	Co-60	0.0121	7.55E+03	6.95E+06	0.0011	0.0147	8.82E+07	0.0001	0.0012	5.98E+06	0.0013	0.3730
					Ni-63	180	1.36E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0074	
					Sr-90	0.002	1.24E+03	1.90E+06	0.0007		2.41E+07	0.0001		6.58E+04	0.0188	
					Cs-134	0.0001	8.21E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
					Cs-137	0.9878	6.18E+05	4.86E+07	0.0127		6.17E+08	0.0010		1.79E+06	0.3455	



	-		-		-										
		Feet	Gamma		Gamma	Activity	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Turbine	Turbine	Turbine
No.	Sample ID	into	Result	ROC	Mixture/	per ROC	OpDCGL <sub>PN</sub>	ROC	Total	BcDCGL <sub>PN</sub>	ROC	Total	OpDCGL <sub>B</sub>	ROC	Total
31	A005 Position#1	Pipe 1	(pCi/m <sup>2</sup> ) 3.74E+05	Co-60	HTD Ratio 0.0121	(pCi/m <sup>2</sup> ) 4.51E+03	(pCi/m <sup>2</sup> ) 6.95E+06	<b>OpSOF</b> <sub>PN</sub> 0.0006	<b>OpSOF</b> <sub>PN</sub> 0.0088	(pCi/m <sup>2</sup> ) 8.82E+07	BcSOF <sub>PN</sub> 0.0001	BcSOF <sub>PN</sub> 0.0007	(pCi/m <sup>2</sup> ) 5.98E+06	ОрSOF <sub>в</sub> 0.0008	ОрSOF <sub>в</sub> 0.2228
51	A005 Position#1	1	5.74E+05	Ni-63	180	4.31E+03 8.14E+05	6.93E+08 5.35E+09	0.0008	0.0088	6.79E+10	0.0001	0.0007	1.85E+08	0.0008	0.2228
				Sr-90	0.002	7.39E+02	1.90E+09	0.0002		2.41E+07	0.0000		6.58E+04	0.0044	
				Cs-134	0.002	4.90E+02	2.58E+07	0.0004		3.28E+08	0.0000		1.35E+04	0.0000	
				Cs-134 Cs-137	0.9878	4.90E+01 3.69E+05	2.38E+07 4.86E+07	0.0000		6.17E+08	0.0006		1.53E+06 1.79E+06	0.0000	
32	A005 Position#2	2	3.73E+05	Co-60	0.0121	4.50E+03	6.95E+06	0.0006	0.0088	8.82E+07	0.0000	0.0007	5.98E+06	0.2004	0.2222
32	A005 TOSITIOII#2	2	5.751+05	Ni-63	180	8.12E+05	5.35E+00	0.0002	0.0088	6.79E+10	0.0001	0.0007	1.85E+08	0.0008	0.2222
				Sr-90	0.002	7.37E+02	1.90E+09	0.0002		2.41E+07	0.0000		6.58E+04	0.0044	
				Cs-134	0.0001	4.89E+01	2.58E+07	0.0004		3.28E+08	0.0000		1.35E+04	0.0000	
				Cs-137	0.9878	3.68E+05	4.86E+07	0.0076		6.17E+08	0.0006		1.79E+06	0.2058	
33	A005 Position#3	3	4.20E+05	Co-60	0.0121	5.07E+03	6.95E+06	0.0007	0.0099	8.82E+07	0.0000	0.0008	5.98E+06	0.2038	0.2504
55	1005 10311011/5	5	4.201-05	Ni-63	180	9.15E+05	5.35E+00	0.0007	0.0077	6.79E+10	0.0001	0.0000	1.85E+08	0.0000	0.2304
				Sr-90	0.002	8.30E+02	1.90E+06	0.0002		2.41E+07	0.0000		6.58E+04	0.0049	
				Cs-134	0.0001	5.51E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.15E+05	4.86E+07	0.0085		6.17E+08	0.0007		1.79E+06	0.2319	
34	A020 Position#1	1	4.25E+05	Co-60	0.0121	5.13E+03	6.95E+06	0.0007	0.0100	8.82E+07	0.0001	0.0008	5.98E+06	0.0009	0.2533
		_		Ni-63	180	9.26E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0050	
				Sr-90	0.002	8.40E+02	1.90E+06	0.0004		2.41E+07	0.0000		6.58E+04	0.0128	
				Cs-134	0.0001	5.58E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.20E+05	4.86E+07	0.0086		6.17E+08	0.0007		1.79E+06	0.2346	
35	A020 Position#2	2	4.96E+05	Co-60	0.0121	5.98E+03	6.95E+06	0.0009	0.0117	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.2955
				Ni-63	180	1.08E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0058	
				Sr-90	0.002	9.80E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0149	
				Cs-134	0.0001	6.51E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.90E+05	4.86E+07	0.0101		6.17E+08	0.0008		1.79E+06	0.2737	
36	A020 Position#3	3	4.93E+05	Co-60	0.0121	5.95E+03	6.95E+06	0.0009	0.0116	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.2937
				Ni-63	180	1.07E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0058	
				Sr-90	0.002	9.74E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0148	
				Cs-134	0.0001	6.47E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.87E+05	4.86E+07	0.0100		6.17E+08	0.0008		1.79E+06	0.2721	
37	A021 Position#1	1	5.53E+05	Co-60	0.0121	6.67E+03	6.95E+06	0.0010	0.0130	8.82E+07	0.0001	0.0010	5.98E+06	0.0011	0.3295
				Ni-63	180	1.20E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0065	
				Sr-90	0.002	1.09E+03	1.90E+06	0.0006		2.41E+07	0.0000		6.58E+04	0.0166	
				Cs-134	0.0001	7.25E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	5.46E+05	4.86E+07	0.0112		6.17E+08	0.0009		1.79E+06	0.3052	
38	A021 Position#2	2	4.64E+05	Co-60	0.0121	5.59E+03	6.95E+06	0.0008	0.0109	8.82E+07	0.0001	0.0009	5.98E+06	0.0009	0.2762
				Ni-63	180	1.01E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0055	
				Sr-90	0.002	9.16E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0139	
				Cs-134	0.0001	6.08E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.58E+05	4.86E+07	0.0094		6.17E+08	0.0007		1.79E+06	0.2558	

### Penetration Survey Data Assessment (continued)



		Feet	Gamma		Gamma	Activity	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Turbine	Turbine	Turbine
No.	Sample ID	into	Result	ROC	Mixture/	per ROC	<b>OpDCGL</b> <sub>PN</sub>	ROC	Total	BcDCGL <sub>PN</sub>	ROC	Total	OpDCGL <sub>B</sub>	ROC	Total
		Pipe	(pCi/m <sup>2</sup> )		HTD Ratio	(pCi/m <sup>2</sup> )	(pCi/m <sup>2</sup> )	<b>OpSOF</b> <sub>PN</sub>	<b>OpSOF</b> <sub>PN</sub>	(pCi/m <sup>2</sup> )	<b>BcSOF</b> <sub>PN</sub>	<b>BcSOF</b> <sub>PN</sub>	(pCi/m <sup>2</sup> )	<b>OpSOF</b> <sub>B</sub>	<b>OpSOF</b> <sub>B</sub>
39	A021 Position#3	3	4.66E+05	Co-60	0.0121	5.63E+03	6.95E+06	0.0008	0.0110	8.82E+07	0.0001	0.0009	5.98E+06	0.0009	0.2779
				Ni-63	180	1.02E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0055	
				Sr-90	0.002	9.22E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0140	
				Cs-134	0.0001	6.12E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.61E+05	4.86E+07	0.0095		6.17E+08	0.0007		1.79E+06	0.2574	
40	A022 Position#1	1	3.68E+05	Co-60	0.0121	4.44E+03	6.95E+06	0.0006	0.0087	8.82E+07	0.0001	0.0007	5.98E+06	0.0007	0.2193
				Ni-63	180	8.01E+05	5.35E+09	0.0001		6.79E+10	0.0000		1.85E+08	0.0043	
				Sr-90	0.002	7.27E+02	1.90E+06	0.0004		2.41E+07	0.0000		6.58E+04	0.0111	
				Cs-134	0.0001	4.83E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	3.64E+05	4.86E+07	0.0075		6.17E+08	0.0006		1.79E+06	0.2031	
41	A022 Position#2	2	3.70E+05	Co-60	0.0121	4.46E+03	6.95E+06	0.0006	0.0087	8.82E+07	0.0001	0.0007	5.98E+06	0.0007	0.2205
				Ni-63	180	8.06E+05	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0044	
				Sr-90	0.002	7.31E+02	1.90E+06	0.0004		2.41E+07	0.0000		6.58E+04	0.0111	
				Cs-134	0.0001	4.85E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	3.66E+05	4.86E+07	0.0075		6.17E+08	0.0006		1.79E+06	0.2042	
42	A022 Position#3	3	5.00E+05	Co-60	0.0121	6.03E+03	6.95E+06	0.0009	0.0118	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.2979
				Ni-63	180	1.09E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0059	
				Sr-90	0.002	9.88E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0150	
				Cs-134	0.0001	6.56E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.94E+05	4.86E+07	0.0102		6.17E+08	0.0008		1.79E+06	0.2759	
43	A023 Position#1	1	5.16E+06	Co-60	0.0121	6.23E+04	6.95E+06	0.0090	0.1214	8.82E+07	0.0007	0.0096	5.98E+06	0.0104	3.0764
				Ni-63	180	1.12E+07	5.35E+09	0.0021		6.79E+10	0.0002		1.85E+08	0.0608	
				Sr-90	0.002	1.02E+04	1.90E+06	0.0054		2.41E+07	0.0004		6.58E+04	0.1550	
				Cs-134	0.0001	6.77E+02	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0005	
				Cs-137	0.9878	5.10E+06	4.86E+07	0.1050		6.17E+08	0.0083		1.79E+06	2.8497	
44	A023 Position#2	2	7.02E+06	Co-60	0.0121	8.47E+04	6.95E+06	0.0122	0.1650	8.82E+07	0.0010	0.0130	5.98E+06	0.0142	4.1811
				Ni-63	180	1.53E+07	5.35E+09	0.0029		6.79E+10	0.0002		1.85E+08	0.0826	
				Sr-90	0.002	1.39E+04	1.90E+06	0.0073		2.41E+07	0.0006	-	6.58E+04	0.2107	-
				Cs-134	0.0001	9.20E+02	2.58E+07	0.0000		3.28E+08	0.0000	-	1.35E+06	0.0007	-
				Cs-137	0.9878	6.93E+06	4.86E+07	0.1426		6.17E+08	0.0112		1.79E+06	3.8729	
45	A023 Position#3	3	5.40E+06	Co-60	0.0121	6.52E+04	6.95E+06	0.0094	0.1270	8.82E+07	0.0007	0.0100	5.98E+06	0.0109	3.2190
				Ni-63	180	1.18E+07	5.35E+09	0.0022		6.79E+10	0.0002		1.85E+08	0.0636	
				Sr-90	0.002	1.07E+04	1.90E+06	0.0056		2.41E+07	0.0004		6.58E+04	0.1622	
				Cs-134	0.0001	7.09E+02	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0005	
				Cs-137	0.9878	5.34E+06	4.86E+07	0.1098		6.17E+08	0.0087		1.79E+06	2.9817	
46	A017 Position#1	1	8.21E+05	Co-60	0.0121	9.91E+03	6.95E+06	0.0014	0.0193	8.82E+07	0.0001	0.0015	5.98E+06	0.0017	0.4893
1		1		Ni-63	180	1.79E+06	5.35E+09	0.0003		6.79E+10	0.0000	4	1.85E+08	0.0097	4
1		1		Sr-90	0.002	1.62E+03	1.90E+06	0.0009		2.41E+07	0.0001	4	6.58E+04	0.0247	4
1		1		Cs-134	0.0001	1.08E+02	2.58E+07	0.0000		3.28E+08	0.0000	-	1.35E+06	0.0001	4

### Penetration Survey Data Assessment (continued)

0.0167

4.86E+07

Cs-137

0.9878

8.11E+05

6.17E+08

0.0013

1.79E+06

0.4533

Cs-137

0.9878

3.58E+04



								-		-						
			Feet	Gamma		Gamma	Activity	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Turbine	Turbine	Turbine
No.	Sample	(D	into	Result	ROC	Mixture/	per ROC	OpDCGL <sub>PN</sub>	ROC	Total	BcDCGL <sub>PN</sub>	ROC	Total	OpDCGL <sub>B</sub>	ROC	Total
47	4.017	Desition#2	Pipe	$(pCi/m^2)$	C = (0	<b>HTD Ratio</b> 0.0121	(pCi/m <sup>2</sup> ) 1.07E+04	(pCi/m <sup>2</sup> )	OpSOF <sub>PN</sub>	<b>OpSOF</b> <sub>PN</sub> 0.0208	$(pCi/m^2)$	BcSOF <sub>PN</sub> 0.0001	BcSOF <sub>PN</sub>	(pCi/m <sup>2</sup> ) 5.98E+06	<b>OpSOF</b> <sub>B</sub>	Ор8ОF <sub>в</sub> 0.5272
4/	A017	Position#2	2	8.85E+05	Co-60			6.95E+06	0.0015	0.0208	8.82E+07		0.0016		0.0018	0.5272
					Ni-63 Sr-90	180 0.002	1.93E+06	5.35E+09	0.0004		6.79E+10 2.41E+07	0.0000		1.85E+08	0.0104	
							1.75E+03	1.90E+06	0.0009			0.0001		6.58E+04	0.0266	
					Cs-134	0.0001	1.16E+02	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
40	1017	D ::: //2	2	1.075:06	Cs-137	0.9878	8.74E+05	4.86E+07	0.0180	0.0251	6.17E+08	0.0014	0.0020	1.79E+06	0.4884	0.6257
48	A017	Position#3	3	1.07E+06	Co-60	0.0121	1.29E+04	6.95E+06	0.0019	0.0251	8.82E+07	0.0001	0.0020	5.98E+06	0.0022	0.6357
					Ni-63	180	2.32E+06	5.35E+09	0.0004		6.79E+10	0.0000		1.85E+08	0.0126	
					Sr-90	0.002	2.11E+03	1.90E+06	0.0011		2.41E+07	0.0001		6.58E+04	0.0320	
					Cs-134	0.0001	1.40E+02	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
					Cs-137	0.9878	1.05E+06	4.86E+07	0.0217		6.17E+08	0.0017		1.79E+06	0.5889	
49	A010	Position#1	1	6.97E+05	Co-60	0.0121	8.41E+03	6.95E+06	0.0012	0.0164	8.82E+07	0.0001	0.0013	5.98E+06	0.0014	0.4153
					Ni-63	180	1.52E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0082	
					Sr-90	0.002	1.38E+03	1.90E+06	0.0007		2.41E+07	0.0001		6.58E+04	0.0209	
					Cs-134	0.0001	9.14E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
					Cs-137	0.9878	6.89E+05	4.86E+07	0.0142		6.17E+08	0.0011		1.79E+06	0.3846	
50	A010	Position#2	2	7.12E+05	Co-60	0.0121	8.59E+03	6.95E+06	0.0012	0.0167	8.82E+07	0.0001	0.0013	5.98E+06	0.0014	0.4240
					Ni-63	180	1.55E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0084	
					Sr-90	0.002	1.41E+03	1.90E+06	0.0007		2.41E+07	0.0001		6.58E+04	0.0214	
					Cs-134	0.0001	9.33E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
					Cs-137	0.9878	7.03E+05	4.86E+07	0.0145		6.17E+08	0.0011		1.79E+06	0.3928	
51	A010	Position#3	3	8.35E+05						0.0196			0.0015			0.4975
					Sr-90		1.65E+03	1.90E+06	0.0009		2.41E+07			6.58E+04		
					Cs-134		1.10E+02	2.58E+07	0.0000		3.28E+08			1.35E+06		
					Cs-137	0.9878	8.25E+05	4.86E+07	0.0170		6.17E+08	0.0013		1.79E+06	0.4608	
52	A001	Position #1	3	3.48E+04	Co-60	0.0121	4.20E+02	6.95E+06	0.0001	0.0008	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0208
					Ni-63	180	7.59E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0004	
					Sr-90	0.002	6.88E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0010	
					Cs-134	0.0001	4.57E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	3.44E+04	4.86E+07	0.0007		6.17E+08	0.0001		1.79E+06	0.0192	
53	A001	Position #2	2	3.82E+04	Co-60	0.0121	4.61E+02	6.95E+06	0.0001	0.0009	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0228
					Ni-63	180	8.33E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0005	
					Sr-90	0.002	7.56E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0011	
					Cs-134	0.0001	5.02E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	3.78E+04	4.86E+07	0.0008		6.17E+08	0.0001		1.79E+06	0.0211	
54	A001	Position #3	1	3.62E+04	Co-60	0.0121	4.37E+02	6.95E+06	0.0001	0.0009	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0216
					Ni-63		7.89E+04				6.79E+10					
					Sr-90	0.002	7.16E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0011	
					Cs-134	0.0001	4.75E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
52	A001	Position #2	3	3.82E+04	Cs-137           Co-60           Ni-63           Sr-90           Cs-134           Cs-137           Co-60           Ni-63           Sr-90           Cs-134           Cs-137           Co-60           Ni-63           Sr-90           Ni-63           Sr-90	0.0121 180 0.002 0.0001 0.9878 0.0121 180 0.002 0.0001 0.9878 0.0121 180 0.002	8.25E+05 4.20E+02 7.59E+04 6.88E+01 4.57E+00 3.44E+04 4.61E+02 8.33E+04 7.56E+01 5.02E+00 3.78E+04 4.37E+02 7.89E+04 7.16E+01	4.86E+07 6.95E+06 5.35E+09 1.90E+06 2.58E+07 4.86E+07 6.95E+06 5.35E+09 1.90E+06 2.58E+07 4.86E+07 6.95E+06 5.35E+09 1.90E+06	0.0170 0.0001 0.0000 0.0000 0.0007 0.0001 0.0000 0.0000 0.0000 0.0000 0.0008 0.0001 0.0000 0.0000	0.0009	6.17E+08 8.82E+07 6.79E+10 2.41E+07 3.28E+08 6.17E+08 8.82E+07 6.79E+10 2.41E+07 3.28E+08 6.17E+08 8.82E+07 6.79E+10 2.41E+07	$\begin{array}{c} 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ 0.0000\\ \end{array}$	0.0001	$\begin{array}{r} 1.79E{+}06\\ \overline{5.98E{+}06}\\ 1.85E{+}08\\ 6.58E{+}04\\ 1.35E{+}06\\ 1.79E{+}06\\ \overline{5.98E{+}06}\\ 1.85E{+}08\\ 6.58E{+}04\\ 1.35E{+}06\\ \overline{1.79E{+}06}\\ \overline{5.98E{+}06}\\ 1.85E{+}08\\ 6.58E{+}04\\ \end{array}$	0.0001 0.0004 0.0010 0.0000 0.0192 0.0001 0.0005 0.0011 0.0000 0.0211 0.0001 0.0004 0.0011	0.0228

### Penetration Survey Data Assessment (continued)

0.0007

6.17E+08

0.0001

1.79E+06

0.0200

4.86E+07



### Penetration Survey Data Assessment (continued)

		Feet	Gamma		Gamma	Activity	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Auxiliary	Turbine	Turbine	Turbine
No.	Sample ID	into	Result	ROC	Mixture/	per ROC	OpDCGL <sub>PN</sub>	ROC	Total	BcDCGL <sub>PN</sub>	ROC	Total	OpDCGL <sub>B</sub>	ROC	Total
55	A014 Position #1	Pipe 3	(pCi/m <sup>2</sup> ) 2.24E+04	Co-60	HTD Ratio 0.0121	(pCi/m <sup>2</sup> ) 2.71E+02	$(pCi/m^2)$	ОрSOF <sub>PN</sub> 0.0000	<b>OpSOF</b> <sub>PN</sub> 0.0005	(pCi/m <sup>2</sup> ) 8.82E+07	BcSOF <sub>PN</sub> 0.0000	BcSOF <sub>PN</sub> 0.0000	(pCi/m <sup>2</sup> ) 5.98E+06	<b>ОрSOF</b> <sub>в</sub> 0.0000	ОрSOF <sub>в</sub> 0.0134
55	A014 Position #1	3	2.24E+04	Ni-63	180	2.71E+02 4.88E+04	6.95E+06 5.35E+09	0.0000	0.0005	8.82E+07 6.79E+10	0.0000	0.0000	5.98E+06 1.85E+08	0.0000	0.0134
					0.002		5.55E+09 1.90E+06	0.0000	-	6.79E+10 2.41E+07	0.0000	-		0.0003	
				Sr-90		4.43E+01			-			-	6.58E+04		
				Cs-134	0.0001 0.9878	2.94E+00 2.22E+04	2.58E+07 4.86E+07	0.0000 0.0005	-	3.28E+08 6.17E+08	0.0000	-	1.35E+06 1.79E+06	0.0000	
5(	A014 Decition #2	2	2.92E+04	Cs-137 Co-60	0.9878	2.22E+04 3.53E+02	4.86E+07 6.95E+06	0.0003	0.0007		0.0000	0.0001		0.0124	0.0174
56	A014 Position #2	2	2.92E+04	Ni-63	180	6.36E+02	6.95E+06 5.35E+09	0.0001	0.0007	8.82E+07 6.79E+10	0.0000	0.0001	5.98E+06 1.85E+08	0.0001	0.0174
					0.002	6.36E+04 5.78E+01	5.55E+09 1.90E+06	0.0000	-	6.79E+10 2.41E+07	0.0000	-		0.0003	
				Sr-90					-			-	6.58E+04		
				Cs-134	0.0001	3.83E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
57	A014 D 11 1/2	1	2.2(E+04	Cs-137	0.9878	2.89E+04	4.86E+07	0.0006	0.0000	6.17E+08	0.0000	0.0001	1.79E+06	0.0161	0.0200
57	A014 Position #3	1	3.36E+04	Co-60	0.0121	4.06E+02	6.95E+06	0.0001	0.0008	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0200
				Ni-63	180 0.002	7.32E+04 6.65E+01	5.35E+09 1.90E+06	0.0000		6.79E+10	0.0000		1.85E+08	0.0004	
				Sr-90 Cs-134	0.002		1.90E+06 2.58E+07	0.0000	-	2.41E+07 3.28E+08	0.0000	-	6.58E+04 1.35E+06	0.0010	
				-	0.0001	4.41E+00	2.38E+07 4.86E+07	0.0000	-		0.0000	-		0.0000	
58	A004 Position #1	3	3.14E+04	Cs-137	0.9878	3.32E+04 3.79E+02	4.86E+07 6.95E+06	0.0007	0.0007	6.17E+08 8.82E+07	0.0001	0.0001	1.79E+06 5.98E+06	0.0186	0.0187
38	A004 Position #1	3	3.14E+04	Co-60 Ni-63	180	6.84E+04	6.95E+06 5.35E+09	0.0001	0.0007	6.79E+10	0.0000	0.0001	5.98E+06 1.85E+08	0.0001	0.0187
				Sr-90	0.002	6.21E+01	1.90E+06	0.0000	-	0.79E+10 2.41E+07	0.0000	-	6.58E+04	0.0004	
				Cs-134	0.002	4.12E+00	2.58E+07	0.0000	-	2.41E+07 3.28E+08	0.0000	-	0.38E+04 1.35E+06	0.0009	
				Cs-134 Cs-137	0.0001	4.12E+00 3.11E+04	2.38E+07 4.86E+07	0.0000	-	5.28E+08 6.17E+08	0.0000	-	1.33E+06 1.79E+06	0.0000	
59	A004 Position #2	2	2.80E+04	Co-60	0.9878	3.38E+02	4.80E+07 6.95E+06	0.0000	0.0007	8.82E+07	0.0001	0.0001	5.98E+06	0.00175	0.0167
39	A004 FOSITION #2	2	2.80E+04	Ni-63	180	6.10E+04	5.35E+00	0.0000	0.0007	6.79E+10	0.0000	0.0001	1.85E+08	0.0001	0.0107
				Sr-90	0.002	5.54E+01	1.90E+09	0.0000		2.41E+07	0.0000		6.58E+04	0.0003	
				Cs-134	0.002	3.68E+00	2.58E+07	0.0000		3.28E+08	0.0000		0.38E+04 1.35E+06	0.0008	
				Cs-134 Cs-137	0.9878	2.77E+04	4.86E+07	0.0000		6.17E+08	0.0000		1.33E+00 1.79E+06	0.0000	
60	A004 Position #3	1	3.58E+04	Co-60	0.0121	4.32E+02	6.95E+06	0.0000	0.0008	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0214
00	A004 1 0511011 #5	1	5.58E+04	Ni-63	180	7.80E+04	5.35E+00	0.0001	0.0008	6.79E+10	0.0000	0.0001	1.85E+08	0.0001	0.0214
				Sr-90	0.002	7.08E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0004	
				Cs-134	0.002	4.70E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+04	0.0000	
				Cs-134 Cs-137	0.9878	3.54E+04	4.86E+07	0.0007		6.17E+08	0.0000		1.79E+06	0.0000	
61	A024 Position #1	3	3.72E+04	Co-60	0.0121	4.49E+04	6.95E+06	0.0007	0.0009	8.82E+07	0.0001	0.0001	5.98E+06	0.0001	0.0222
01		5	5.72L+04	Ni-63	180	8.11E+04	5.35E+00	0.0001	0.0009	6.79E+10	0.0000	0.0001	1.85E+08	0.0004	0.0222
				Sr-90	0.002	7.36E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0004	
				Cs-134	0.002	4.88E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+04	0.0000	
				Cs-134 Cs-137	0.9878	4.88E+00 3.68E+04	4.86E+07	0.0000		6.17E+08	0.0000		1.33E+00 1.79E+06	0.0000	
62	A024 Position #2	2	6.31E+04	Co-60	0.0121	7.61E+02	6.95E+06	0.0003	0.0015	8.82E+07	0.0001	0.0001	5.98E+06	0.0200	0.0376
02	1027 10510011#2	2	0.511.04	Ni-63	180	1.37E+05	5.35E+00	0.0001	0.0015	6.79E+10	0.0000	0.0001	1.85E+08	0.0007	0.0570
				Sr-90	0.002	1.37E+03 1.25E+02	1.90E+06	0.0000	1	2.41E+07	0.0000	1	6.58E+04	0.0007	
				Cs-134	0.002	8.27E+00	2.58E+07	0.0001		3.28E+08	0.0000		1.35E+04	0.0000	
				Cs-134 Cs-137	0.9878	6.23E+04	4.86E+07	0.0000		6.17E+08	0.0000		1.33E+00 1.79E+06	0.0000	
		<u> </u>		US-13/	0.90/0	0.23E+04	4.00ETU/	0.0015		0.1/ETU8	0.0001		1./9ETU0	0.0346	



								•								
No.	Sample	ID	Feet into Pipe	Gamma Result (pCi/m <sup>2</sup> )	ROC	Gamma Mixture/ HTD Ratio	Activity per ROC (pCi/m <sup>2</sup> )	Auxiliary OpDCGL <sub>PN</sub> (pCi/m <sup>2</sup> )	Auxiliary ROC OpSOF <sub>PN</sub>	Auxiliary Total OpSOF <sub>PN</sub>	Auxiliary BcDCGL <sub>PN</sub> (pCi/m <sup>2</sup> )	Auxiliary ROC BcSOF <sub>PN</sub>	Auxiliary Total BcSOF <sub>PN</sub>	Turbine OpDCGL <sub>B</sub> (pCi/m <sup>2</sup> )	Turbine ROC OpSOF <sub>B</sub>	Turbine Total OpSOF <sub>B</sub>
63	A024	Position #3	1	1.11E+05	Co-60	0.0121	1.34E+03	6.95E+06	0.0002	0.0026	8.82E+07	0.0000	0.0002	5.98E+06	0.0002	0.0662
					Ni-63	180	2.42E+05	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0013	
					Sr-90	0.002	2.20E+02	1.90E+06	0.0001		2.41E+07	0.0000		6.58E+04	0.0033	
					Cs-134	0.0001	1.46E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	1.10E+05	4.86E+07	0.0023		6.17E+08	0.0002		1.79E+06	0.0613	
64	A025	Position #1	3	2.74E+04	Co-60	0.0121	3.31E+02	6.95E+06	0.0000	0.0006	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0163
					Ni-63	180	5.97E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0003	
					Sr-90	0.002	5.42E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0008	
					Cs-134	0.0001	3.60E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	2.71E+04	4.86E+07	0.0006		6.17E+08	0.0000		1.79E+06	0.0151	
65	A025	Position #2	2	2.60E+04	Co-60	0.0121	3.14E+02	6.95E+06	0.0000	0.0006	8.82E+07	0.0000	0.0000	5.98E+06	0.0001	0.0155
					Ni-63	180	5.67E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0003	
					Sr-90	0.002	5.14E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0008	
					Cs-134	0.0001	3.41E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	2.57E+04	4.86E+07	0.0005		6.17E+08	0.0000		1.79E+06	0.0144	
66	A025	Position #3	1	2.94E+04	Co-60	0.0121	3.55E+02	6.95E+06	0.0001	0.0007	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0175
					Ni-63	180	6.41E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0003	
					Sr-90	0.002	5.81E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0009	
					Cs-134	0.0001	3.86E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
					Cs-137	0.9878	2.91E+04	4.86E+07	0.0006		6.17E+08	0.0000		1.79E+06	0.0162	

### Penetration Survey Data Assessment (continued)

### ATTACHMENT 3 SIGN TEST



Survey A	C	051	•	C		Auxiliary		Basement
Survey U	Jnit	S1-051	20AF	Desc	ription	F	enetrations	5
Classifica	tion 1	Type I	Error 0.	05 # of	f Measurer	nents	66	
				r				
#	SOF	1-Ws	Sign		#	SOF	1-Ws	Sign
	(Ws)					(Ws)		
1	0.0094	0.99	+1		34	0.0100	0.99	+1
2	0.0097	0.99	+1		35	0.0117	0.99	+1
3	0.0100	0.99	+1		36	0.0116	0.99	+1
4	0.0123	0.99	+1		37	0.0130	0.99	+1
5	0.0112	0.99	+1		38	0.0109	0.99	+1
6	0.0111	0.99	+1		39	0.0110	0.99	+1
7	0.0103	0.99	+1		40	0.0087	0.99	+1
8	0.0101	0.99	+1		41	0.0087	0.99	+1
9	0.0103	0.99	+1		42	0.0118	0.99	+1
10	0.0102	0.99	+1		43	0.1214	0.88	+1
11	0.0096	0.99	+1		44	0.1650	0.83	+1
12	0.0121	0.99	+1		45	0.1270	0.87	+1
13	0.0133	0.99	+1		46	0.0193	0.98	+1
14	0.0144	0.99	+1		47	0.0208	0.98	+1
15	0.0335	0.97	+1		48	0.0251	0.97	+1
16	0.0155	0.98	+1		49	0.0164	0.98	+1
17	0.0162	0.98	+1		50	0.0167	0.98	+1
18	0.0166	0.98	+1		51	0.0196	0.98	+1
19	0.2427	0.76	+1		52	0.0008	1.00	+1
20	0.2794	0.72	+1		53	0.0009	1.00	+1
21	0.2352	0.76	+1		54	0.0009	1.00	+1
22	0.0106	0.99	+1		55	0.0005	1.00	+1
23	0.0107	0.99	+1		56	0.0007	1.00	+1
24	0.0137	0.99	+1		57	0.0008	1.00	+1
25	0.0093	0.99	+1		58	0.0007	1.00	+1
26	0.0092	0.99	+1		59	0.0007	1.00	+1
27	0.0101	0.99	+1		60	0.0008	1.00	+1
28	0.0129	0.99	+1		61	0.0009	1.00	+1
29	0.0128	0.99	+1		62	0.0015	1.00	+1
30	0.0147	0.99	+1		63	0.0026	0.99	+1
31	0.0088	0.99	+1		64	0.0006	1.00	+1

### Sign Test Auxiliary Building Basement Penetrations



### Sign Test (continued) Auxiliary Building Basement Penetrations

#	SOF (Ws)	1-Ws	Sign
32	0.0088	0.99	+1
33	0.0099	0.99	+1

#	SOF (Ws)	1-Ws	Sign
65	0.0006	1.00	+1
66	0.0007	1.00	+1

Number of Positive Differences (S+) = 66

Critical Value = 40

Survey Unit Meets the Acceptance Criteria

# ATTACHMENT 4 QC DATA



No.	Sample ID	Feet into	Gamma Result	ROC	Gamma Mixture/	Activity per ROC	Auxiliary OpDCGL <sub>PN</sub>	Auxiliary ROC	Auxiliary Total	Auxiliary BcDCGL <sub>PN</sub>	Auxiliary ROC	Auxiliary Total	Turbine OpDCGL <sub>B</sub>	Turbine ROC	Turbine Total
110.	Sample 1D	Pipe	(pCi/m <sup>2</sup> )	KOC	HTD Ratio	$(pCi/m^2)$	(pCi/m <sup>2</sup> )	OpSOF <sub>PN</sub>	OpSOF <sub>PN</sub>	(pCi/m <sup>2</sup> )	BcSOF <sub>PN</sub>	BcSOF <sub>PN</sub>	$(pCi/m^2)$	OpSOF <sub>B</sub>	OpSOF <sub>B</sub>
54	A014 Position #3	1	2.90E+04	Co-60	0.0121	3.50E+02	6.95E+06	0.0001	0.0007	8.82E+07	0.0000	0.0001	5.98E+06	0.0001	0.0173
QC				Ni-63	180	6.32E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0003	
				Sr-90	0.002	5.74E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0009	
				Cs-134	0.0001	3.81E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	2.87E+04	4.86E+07	0.0006		6.17E+08	0.0000		1.79E+06	0.0160	
66	A025 Position #3	1	2.40E+04	Co-60	0.0121	2.90E+02	6.95E+06	0.0000	0.0006	8.82E+07	0.0000	0.0000	5.98E+06	0.0000	0.0143
QC				Ni-63	180	5.23E+04	5.35E+09	0.0000		6.79E+10	0.0000		1.85E+08	0.0003	
				Sr-90	0.002	4.75E+01	1.90E+06	0.0000		2.41E+07	0.0000		6.58E+04	0.0007	
				Cs-134	0.0001	3.15E+00	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	2.37E+04	4.86E+07	0.0005		6.17E+08	0.0000		1.79E+06	0.0133	
38	A021 Position #2	2	4.66E+05	Co-60	0.0121	5.62E+03	6.95E+06	0.0008	0.0109	8.82E+07	0.0001	0.0009	5.98E+06	0.0009	0.2773
QC				Ni-63	180	1.01E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0055	
				Sr-90	0.002	9.20E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0140	
				Cs-134	0.0001	6.11E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.60E+05	4.86E+07	0.0095		6.17E+08	0.0007		1.79E+06	0.2569	
10	A002 Position #1	1	4.81E+05	Co-60	0.0121	5.81E+03	6.95E+06	0.0008	0.0113	8.82E+07	0.0001	0.0009	5.98E+06	0.0010	0.2867
QC				Ni-63	180	1.05E+06	5.35E+09	0.0002		6.79E+10	0.0000		1.85E+08	0.0057	
				Sr-90	0.002	9.51E+02	1.90E+06	0.0005		2.41E+07	0.0000		6.58E+04	0.0144	
				Cs-134	0.0001	6.31E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0000	
				Cs-137	0.9878	4.75E+05	4.86E+07	0.0098		6.17E+08	0.0008		1.79E+06	0.2656	
50	A010 Position #2	2	7.21E+05	Co-60	0.0121	8.71E+03	6.95E+06	0.0013	0.0170	8.82E+07	0.0001	0.0013	5.98E+06	0.0015	0.4298
QC				Ni-63	180	1.57E+06	5.35E+09	0.0003		6.79E+10	0.0000		1.85E+08	0.0085	
				Sr-90	0.002	1.43E+03	1.90E+06	0.0008		2.41E+07	0.0001		6.58E+04	0.0217	
				Cs-134	0.0001	9.46E+01	2.58E+07	0.0000		3.28E+08	0.0000		1.35E+06	0.0001	
				Cs-137	0.9878	7.13E+05	4.86E+07	0.0147		6.17E+08	0.0012		1.79E+06	0.3982	

### Penetration QC Survey Data

# ATTACHMENT 5 QC MEASUREMENT ASSESSMENTS



### **Replicate Measurement Assessment**

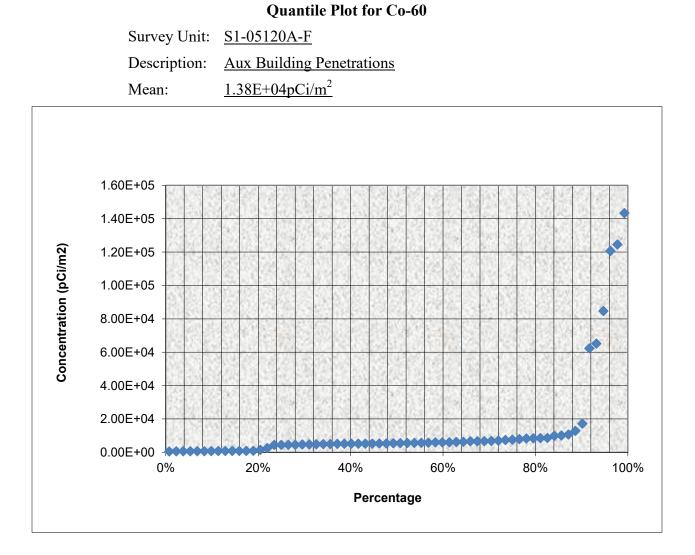
Survey Unit #05120Survey Unit NameAuxiliary Building PenetrationstSample Plan #S1-05120A-F

Sample Description: Comparison of replicate gross-gamma measurements for QC from A002, position 1, A010, position 2, A014, position 3, A021, position 2 and A025 position 3.

	STANDA	ARD		DU	PLICATE	
ID	ACTIVITY	+20%	-20%	ID	ACTIVITY	ACCEPTABLE
	(pCi/m2)	(pCi/m2)	(pCi/m2)		(pCi/m2)	(Y/N)
A014 Position 3	3.36E+04	4.04E+04	2.69E+04	A014 Position 3 QC	2.90E+04	Y
A025 Position 3	2.94E+04	3.53E+04	2.35E+04	A025 Position 3 QC	2.40E+04	Y
A021 Position 2	4.64E+05	5.56E+05	3.71E+05	A021 Position 2 QC	4.66E+05	Y
A002 Position 1	4.32E+05	5.18E+05	3.46E+05	A002 Position 1 QC	4.81E+05	Y
A010 Position 2	7.12E+05	8.54E+05	5.69E+05	A010 Position 2 QC	7.21E+05	Y
Comments/Corr acceptable agree measurement ar further action is	ement betwe d the duplic	en the stand	ard	The acceptance crite measurements and s same conclusion is r measurement. That standard	can surveys reached for e	is that the ach

## ATTACHMENT 6 GRAPHICAL PRESENTATIONS

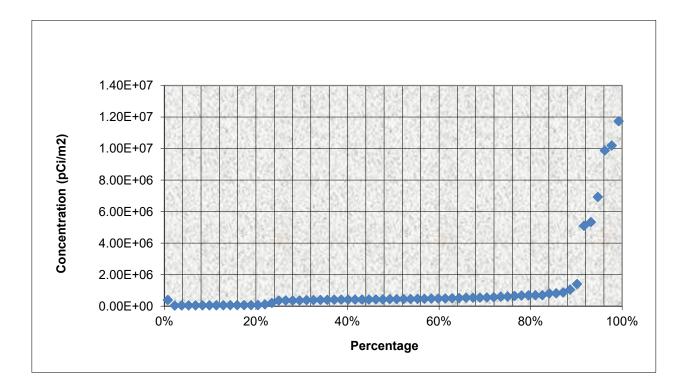






### Quantile Plot for Cs-137

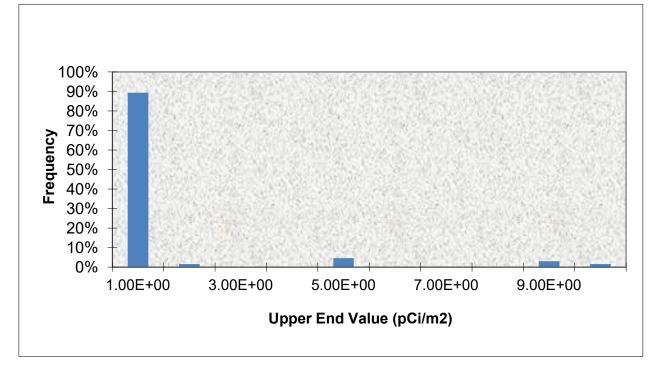
Survey Unit:	<u>S1-05120A-F</u>
Description:	Aux Building Penetrations
Mean:	<u>1.13E+06 pCi/m<sup>2</sup></u>





### Histogram for Co-60

Survey Unit:	S1-05120A-F
Description:	Aux Building Penetrations
Mean:	<u><math>1.38E+04</math> pCi/m<sup>2</sup></u>
Median:	<u>5.47E+03pCi/m<sup>2</sup></u>
ST Dev.:	<u>2.92E+04</u>
Skew:	<u>3.37E+00</u>

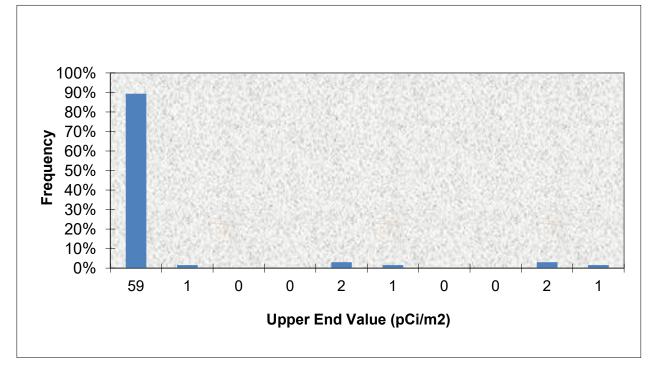


Upper Value	Observation	
	Frequency	<b>Observation %</b>
1.49E+04	59	89%
2.92E+04	1	2%
4.35E+04	0	0%
5.79E+04	0	0%
7.22E+04	3	5%
8.65E+04	0	0%
1.01E+05	0	0%
1.15E+05	0	0%
1.30E+05	2	3%
1.44E+05	1	2%
TOTAL	66	100%



### Histogram for Cs-137

Survey Unit:	S1-05120A-F
Description:	Aux Building Penetrations
Mean:	<u><math>1.13E+05 \text{ pCi/m}^2</math></u>
Median:	$\underline{4.48E+05pCi/m^2}$
ST Dev.:	<u>2.39E+06</u>
Skew:	<u>3.37E+00</u>



<b>Upper Value</b>	Observation	
	Frequency	<b>Observation %</b>
1.22E+06	59	89%
2.39E+06	1	2%
3.56E+06	0	0%
4.74E+06	0	0%
5.91E+06	2	3%
7.08E+06	1	2%
8.26E+06	0	0%
9.43E+06	0	0%
1.06E+07	2	3%
1.18E+07	1	2%
TOTAL	66	100%