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Attached are the remaining pages inadvertently omitted from the May 15th distribution of the Offsite Dose Calculation Manual (ODCM) and Seabrook Annex.
There have been no revisions.

Please complete the following update.

REMOVE

None

INSERT

Beaver Valley Station Annex
Chapter 12, 2 pages
Revision 0.A, dated April 1991
Pages 12-11 through 12-12

Please sign and date this control sheet to verify that the ODCM Beaver Valley Annex, Chapter 12 contains pages 12-1 through 12-12.

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12.4.3 Dose (Continued)

Bases

The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man From Routine Releases of Reactor Effluents For the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I" Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate specifications for Iodine-131 and 133, tritium, and radionuclides in particulate form with half-lives greater than 8 days are dependent upon the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of these calculations were: (1) individual inhalation of airborne radionuclides, (2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, (3) deposition onto grassy areas where milk animals and meat producing animal's graze with consumption of the milk and meat by man, and (4) deposition on the ground with subsequent exposure to man.

This section applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared Radwaste Treatment Systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the Radwaste Treatment System. For determining conformance to Operability Requirements, these allocations from shared Radwaste Treatment Systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

12.4.4 Gaseous Radwaste Treatment System

Operability Requirements

12.4.4.A The VENTILATION EXHAUST TREATMENT SYSTEM and the WASTE GAS HOLDUP SYSTEM shall be OPERABLE and appropriate portions of these systems shall be used to reduce releases of radioactivity when the projected doses in 31 days due to gaseous effluent releases, from each unit, to areas at and beyond the SITE BOUNDARY (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) would exceed:

1. 0.2 mrad to air from gamma radiation, or

2. 0.4 mrad to air from beta radiation, or

3. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC.

Applicability: At all times.

Action:

1. With radioactive gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, a Special Report that includes the following information:

   a. Identification of any inoperable equipment or subsystems, and the reason for the inoperability,

   b. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

   c. Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements

12.4.4.1.B Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when Gaseous Radwaste Treatment Systems are not being fully utilized.

12.4.4.2.B The installed VENTILATION EXHAUST TREATMENT SYSTEM and WASTE GAS HOLDUP SYSTEM shall be considered OPERABLE by meeting Section 12.4.1 and 12.4.2 or 12.4.3.

Bases

12.4.4.C The OPERABILITY of the WASTE GAS HOLDUP SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the system will be available for use whenever gaseous effluents require treatment prior to release to the environment.

12.4.4 Gaseous Radwaste Treatment System (Continued)

Bases

The requirement that the appropriate portions of this system be used when specified provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable". This section implements the requirements of 10 CFR 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the Gaseous Radwaste Treatment System were specified as a suitable fraction of the dose design objectives set forth in Section II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

This section applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared Radwaste Treatment Systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the Radwaste Treatment System. For determining conformance to Operability Requirements, these allocations from shared Radwaste Treatment Systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

12.4.5 Total Dose

Operability Requirements

12.4.5.A The annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

Applicability: At all times.

Action:

1. With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Sections 12.3.2, 12.4.2, or 12.4.3, calculations should be made including direct radiation contributions from the units and from outside storage tanks to determine whether the above limits of Section 12.4.5.A have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentration of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

Surveillance Requirements

12.4.5.1.A Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Sections 12.3.2, 12.4.2, and 12.4.3, and in accordance with the methodology and parameters in the ODCM.

12.4.5.2.B Cumulative dose contributions from direct radiation from the units and from radwaste storage tanks shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in ACTION 1 of Section 12.4.5.A.

12.4.5 Total Dose (Continued)

Bases

12.4.5.C This section is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20 by 46 FR 18525. The section requires the preparation and submittal of a Special Report whenever the calculated doses due to releases of radioactivity and to radiation from uranium fuel cycle sources exceed 25 mrems to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems. For sites containing up to four reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units and outside storage tanks are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR 190.11 and 10 CFR 20.405c, is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20, as addressed in Sections 12.3.1 and 12.4.1. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

12.5 RADIOLOGICAL ENVIRONMENTAL MONITORING

12.5.1 Monitoring Program

Operability Requirements

12.5.1.A The Radiological Environmental Monitoring Program shall be conducted as specified in Table 12.5-1.

Applicability: At all times.

Action:

1. With the Radiological Environmental Monitoring Program not being conducted as specified in Table 12.5-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Technical Specification 6.9.1.6, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

2. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 12.5-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose* to a MEMBER OF THE PUBLIC is less than the calendar year limits of Section 12.3.2, 12.4.2, or 12.4.3. When more than one of the radionuclides in Table 12.5.2 are detected in the sampling medium, this repor. shall be submitted if:

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

When radionuclides other than those in Table 12.5-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose* to A MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of Section 12.3.2, 12.4.2, or 12.4.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report required by Section 12.6.1.

*The methodology and parameters used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in this report.

12.5 RADIOLOGICAL ENVIRONMENTAL MONITORING (Continued)

3. With the milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 12.5-1, identify specific locations for obtaining replacement samples and add them within 30 days to the Radiological Environmental Monitoring Program given in the ODCM. The specific locations from which samples were unavailable may then be deleted from the monitoring program. Submit controlled version of the ODCM within 180 days including a revised figure(s) and table reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples and justifying the selection of new location(s) for obtaining samples.

Surveillance Requirements

12.5.1.B The radiological environmental monitoring samples shall be collected pursuant to Table 12.5-1 from the specific locations given in the table and figure(s) in the ODCM, and shall be analyzed pursuant to the requirements of Table 12.5-1 and the detection capabilities required by Table 12.5-3.

Bases

12.5.1.C The Radiological Environmental Monitoring Program required by this section provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation. This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. Guidance for this monitoring program is provided by the Radiological Assessment Branch Technical Position on Environmental Monitoring. The initially specified monitoring program will be effective for at least the first 3 years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 12.5-3 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as a before the fact limit representing the capability of a measurement system and not as an after the fact limit for a particular measurement.

12.5 RADIOLOGICAL ENVIRONMENTAL MONITORING (Continued)

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, LA., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Anal. Chem. 40, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

TABLE 12.5-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS(1)	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
1. Direct Radiation(2)	Forty routine monitoring stations either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously, placed as follows: An inner ring of stations, one in each meteorological sector in the general area of the SITE BOUNDARY; An outer ring of stations, one in each meteorological sector in the 6- to 8- km range from the site; and The balance of the stations to be placed in special interest areas such as population centers, nearby residences, schools, and in one or two areas to serve as control stations.	Quarterly.	Gamma dose quarterly.

TABLE 12.5-1 (Continued)
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS[1]	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
2. Airborne			
Radioiodine and Particulates	Samples from five locations: Three samples from close to the three SITE BOUNDARY locations, in different sectors, of the highest calculated annual average ground level D/Q; One sample from the vicinity of a community having the highest calculated annual average ground-level D/Q; and One sample from a control location, as for example 10 to 30 km distant and in the least prevalent wind direction.	Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading.	Radioiodine Cannister: I-131 analysis weekly. Particulate Sampler: Gross beta radioactivity analysis following filter change;[3] and gamma isotopic analysis[4] of composite (by location) quarterly.
3. Waterborne			
a. Surface[5]	One sample upstream. One sample downstream.	Composite sample over 1-month period by weekly grab samples.	Gamma isotopic analysis[4] monthly. Composite for tritium analysis quarterly.
b. Ground	Samples from one or two sources only if likely to be affected [7].	Quarterly.	Gamma isotopic[4] and tritium analysis quarterly.

TABLE 12.5-1 (Continued)
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS(1)	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
3. Waterborne (Continued)			
c. Drinking	One sample of each community drinking water supply within 10 miles downstream of the discharge. One sample from a control location.	Composite sample over 2-week period(6) when I-131 analysis is performed, monthly composite otherwise.	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year.(8) Composite for gross beta and gamma isotopic analyses (4) monthly. Composite for tritium analysis quarterly.
d. Sediment from shoreline	One sample from downstream area with existing or potential recreational value.	Semiannually.	Gamma isotopic analysis(4) semiannually.
4. Ingestion			
a. Milk	Samples from milking animals in three locations within 5 km distance having the highest dose potential. If there are none, then, one sample from milking animals in each of three areas between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per yr(8). One sample from milking animals at a control location, 15 to 30 km distant and in the least prevalent wind direction.	Semimonthly when animals are on pasture, monthly at other times.	Gamma isotopic(4) and I-131 analysis semimonthly when animals are on pasture; monthly at other times.

TABLE 12.5-1 (Continued)
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS[1]	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
4. Ingestion (continued)			
b. Fish and Invertebrates	Representative samples of commercially and recreationally important species in vicinity of plant discharge area.	Three times per year (spring, summer and fall).	Gamma isotopic analysis[4] on edible portions.
	Representative samples of commercially and recreationally important species in areas not influenced by plant discharge.		
c. Food Products	Representative samples of the principal classes of food products from any area within 10 miles of the plant that is irrigated by water in which liquid plant wastes have been discharged.	At the time of harvest[9].	Gamma isotopic analysis[4] on edible portion.
	Samples of three different kinds of broad leaf vegetation grown nearest each of two different offsite locations of highest predicted annual average ground-level D/Q if milk sampling is not performed.	Monthly when available.	Gamma isotopic[4] and I-131 analysis.
	One sample of each of the similar broad leaf vegetation grown 15 to 30 km distant in the least prevalent wind direction if milk sampling is not performed.	Monthly when available.	Gamma isotopic[4] and I-131 analysis.

TABLE 12.5-1 (Continued)

TABLE NOTATIONS

(1) Specific parameters of distance and direction sector from the centerline of one unit, and additional description where pertinent, shall be provided for each and every sample location in Table 12.5-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Section 12.6.1. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable specific alternative media and allocations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the Radiological Environmental Monitoring Program given in the ODCM. Submit controlled revisions of the ODCM within 180 days including a revised figure(s) and table reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples for that pathway and justifying the selection of the new location(s) for obtaining samples.

(2) One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. The 40 stations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., at an ocean site, some sectors will be over water so that the number of dosimeters may be reduced accordingly. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information with minimal fading.

(3) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.

TABLE 12.5-1 (Continued)

TABLE NOTATIONS

(4) Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

(5) The "upstream sample" shall be taken at a distance beyond significant influence of the discharge. The "downstream" sample shall be taken in an area beyond but near the mixing zone.

(6) A composite sample is one in which the quantity (aliquot) of liquid sampled is proportional to the quantity of flowing liquid and in which the method of sampling employed results in a specimen that is representative of the liquid flow. In this program composite sample aliquots shall be collected at time intervals that are very short (e.g., hourly) relative to the compositing period (e.g., monthly) in order to assure obtaining a representative sample.

(7) Groundwater samples shall be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination.

(8) The dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.

(9) If harvest occurs more than once a year, sampling shall be performed during each discrete harvest. If harvest occurs continuously, sampling shall be monthly. Attention shall be paid to including samples of tuberous and root food products.

TABLE 12.5-2
REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES

ANALYSIS	WATER (pCi/)	AIRBORNE PARTICULATE OR GASES (pCi/m^3)	FISH (pCi/kg, wet)	MILK (pCi/ℓ)	FOOD PRODUCTS (pCi/kg, wet)
	REPORTING LEVELS				
H-3	20,000*				
Mn-54	1,000		30,000		
Fe-59	400		10,000		
Co-58	1,000		30,000		
Co-60	300		10,000		
Zn-65	300		20,000		
Zr-Nb-95	400				
I-131	2	0.9		3	100
Cs-134	30	10	1,000	60	1,000
Cs-137	50	20	2,000	70	2,000
Ba-La-140	200			300	

*For drinking water samples. This is 40 CFR Part 141 value. If no drinking water pathway exists, a value of 30,000 pCi/ℓ may be used.

TABLE 12.5-3
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS[1]

LOWER LIMIT OF DETECTION (LLD)[2][3]

ANALYSIS	WATER (pCi/ℓ)	AIRBORNE PARTICULATE OR GASES (pCi/m^3)	FISH (pCi/kg, wet)	MILK (pCi/ℓ)	FOOD PRODUCTS (pCi/kg, wet)	SEDIMENT (pCi/kg, dry)
Gross Beta	4	0.01				
H-3	2000*					
Mn-54	15		130			
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131	1[4]	0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

*If no drinking water pathway exists, a value of 3000 pCi/ℓ may be used.

TABLE 12.5-3 (Continued)

TABLE NOTATIONS

(1) This list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to Section 12.6.1.

(2) Required detection capabilities for thermoluminescent dosimeters used for environment measurements shall be in accordance with the recommendations of Regulatory Guide 4.13.

(3) The LLD is defined, for purposes of these specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 s_b}{E \cdot V \cdot 2.22 \times 10^{-6} \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the "a priori" lower limit of detection (picoCuries per unit mass or volume),

s_b = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),

E = the counting efficiency (counts per disintegration),

V = the sample size (units of mass or volume),

2.22 = the number of disintegrations per minute per picoCurie,

Y = the fractional radiochemical yield, when applicable,

λ = the radioactive decay constant for the particular radionuclide (sec^{-1}), and

Δt = the elasped time between sample collection, or end of the sample collection period, and the time of counting (sec).

Typical values of E, V, Y, and Δt should be used in the calculation.

It should be recognized that the LLD is defined as a before the fact limit representing the capability of a measurement system and not as an after the fact limit for a particular measurement.

TABLE 12.5-3 (Continued)

TABLE NOTATIONS

Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally, background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report pursuant to Section 12.6.1.

(4) LLD for drinking water samples. If no drinking water pathway exists, the LLD of gamma isotopic analysis may be used.

12.5.2 Land Use Census

Operability Requirements

12.5.2.A. A Land Use Census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, and the nearest residence. For dose calculation, a garden will be assumed at the nearest residence.

Applicability: At all times.

Action:

1. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Section 12.4.3, identify the new location(s) in the next Annual Radiological Environmental Operating Report, pursuant to Section 12.6.1.

2. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 20% greater than at a location from which samples are currently being obtained in accordance with Section 12.5.1, add the new location(s) within 30 days to the Radiological Environmental Monitoring Program given in the ODCM. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after October 31 of the year in which this Land Use Census was conducted. Pursuant to Section 12.6.1, submit in the next Annual Radiological Environmental Operating Report documentation for a change in the ODCM including a revised figure(s) and table(s) for the ODCM reflecting the new location(s) with information supporting the change in sampling locations.

Surveillance Requirements

12.5.2.B The Land Use Census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report pursuant to Section 12.6.1.

Bases

12.5.2.C This specification is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey, or from consulting with local agricultural authorities shall be used.

12.5.2 Land Use Census (Continued)

Bases

This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. An annual garden census will not be required since the licensee will assume that there is a garden at the nearest residence in each sector for dose calculations.

12.5.3 Interlaboratory Comparison Program

Operability Requirements

12.5.3.A Analyses shall be performed on radioactive materials, supplied as part of an Interlaboratory Comparison Program that has been approved by the Commission, that correspond to samples required by Table 12.5-1.

Applicability: At all times.

Action:

1. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Section 12.6.1.

Surveillance Requirements

12.5.3.B The Interlaboratory Comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Section 12.6.1.

Bases

12.5.3.C The requirement for participation in an approved Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental samples matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

12.6 REPORTING REQUIREMENTS

12.6.1 Annual Radiological Environmental Operating Report*

Routine Annual Radiological Environmental Operating Reports covering the operation of the Unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of the Land Use Census required by Section 12.5.2.

The Annual Radiological Environmental Operating Reports shall include the results of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the tables and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the Radiological Environmental Monitoring Program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program and the corrective actions being taken if the specified program is not being performed as required by Section 12.5.3; reasons for not conducting the Radiological Environmental Monitoring Program as required by Section 12.5.1, and discussion of all deviations from the sampling schedule of Table 12.5-1; discussion of environmental sample measurements that exceed the reporting levels of Table 12.5-2 but are not the result of plant effluents, pursuant to Section 12.5-1; and discussion of all analyses in which the LLD required by Table 12.5-3 was not achievable.

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*A single submittal may be made for a multiple unit station.

**One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

12.6 REPORTING REQUIREMENTS (Continued)

12.6.1 Annual Radiological Environmental Operating Report (Continued)

The Annual Radiological Environmental Operating Report shall also include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.* This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the Unit or Station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Braidwood Station ODCM Annex, Appendix F, Figure F-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

The Annual Radiological Environmental Operating Report to be submitted prior to May 1 of each year shall also include an assessment of radiation doses to the most likely exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operation." Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

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* In lieu of submission with the Annual Radiological Environmental Operating Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

12.6 REPORTING REQUIREMENTS (Continued)

12.6.2 Semi-Annual Radioactive Effluent Release Report**

Routine Semiannual Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

The Semiannual Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

For solid wastes, the format for Table 3 in Appendix B shall be supplemented with three additional categories: class of solid wastes (as defined by 10 CFR Part 61), type of container (e.g., LSA, Type A, Type B, Large Quantity), and SOLIDIFICATION agent or absorbent (e.g, cement, urea formaldehyde).

The Semiannual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PCP, as well as any major changes to Liquid, Gaseous or Solid Radwaste Treatment Systems, pursuant to Section 12.6.3.

The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Section 12.2.1 or 12.2.2, respectively; and description of the events leading to liquid holdup tanks or gas storage tanks exceeding the limits of Technical Specification 3.11.1.4 or 3.11.2.6, respectively.

** A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

12.6 REPORTING REQUIREMENTS (Continued)

12.6.3 Offsite Dose Calculation (ODCM)

12.6.3.1 The ODCM shall be approved by the Commission prior to implementation.

12.6.3.2 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be Specification 6.10.2. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s); and

2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20, 160, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by the Onsite Review and Investigative Function and the approval of the Plant Manager on the date specified by the Onsite Review and Investigative Function.

c. Shall be submitted to the Commission in the form of a complete legible copy of the entire ODCM as part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made effective. Each change shall be indentified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

12.6 REPORTING REQUIREMENTS (Continued)

12.6.4 Major Changes to Liquid and Gaseous Radwaste Treatment Systems*

Licensee-initiated major changes to the Radwaste Treatment Systems (liquid and gaseous):

a. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the Onsite Review and Investigative Function. The discussion of each change shall contain:

1) A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;

2) Sufficient detailed information to totally support the reason for the change without benefit of additional and supplemental information;

3) A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems.

* Licensees may choose to submit the information called for in this section as part of the annual FSAR update.

12.6 REPORTING REQUIREMENTS (Continued)

4) An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the License application and amendments thereto;

5) An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the License application and amendments thereto;

6) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;

7) An estimate of the exposure to plant operating personnel as a result of the change; and

8) Documentation of the fact that the change was reviewed and found acceptable by the Onsite Review and Investigative Function.

b. Shall become effective upon review and acceptance by the Onsite Review and Investigative Function.