

January 7, 2020

ULNRC-06628

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

> 40 CFR 190 10 CFR 50 Appendix I 10CFR 72.44(d)(2)

Ladies and Gentlemen:

DOCKET NUMBER 50-483 CALLAWAY PLANT UNIT 1 UNION ELECTRIC CO. RENEWED FACILITY OPERATING LICENSE NPF-30 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT ERRATA

References:

- 1. Ameren Missouri Letter ULNRC-06111, "2013 Annual Radiological Environmental Operating Report," dated April 22, 2014 (ADAMS Accession No. ML14115A323)
- Ameren Missouri Letter ULNRC-06217, "2014 Annual Radiological Environmental Operating Report," dated April 30, 2015 (ADAMS Accession Nos. ML15120A491 & ML15120A492)
- 3. Ameren Missouri Letter ULNRC-06301, "2015 Annual Radiological Environmental Operating Report," dated April 29, 2016 (ADAMS Accession No. ML16120A614)
- Ameren Missouri Letter ULNRC-06367, "2016 Annual Radiological Environmental Operating Report," dated April 29, 2017 (ADAMS Accession Nos. ML17117A652 & ML17121A075)
- Ameren Missouri Letter ULNRC-06431, "2017 Annual Radiological Environmental Operating Report," dated May 1, 2018 (ADAMS Accession Nos. ML18121A296 & ML18121A297)
- 6. Ameren Missouri Letter ULNRC-06503, "2018 Annual Radiological Environmental Operating Report," dated April 29, 2019 (ADAMS Accession No. ML19120A141)

References 1 through 6 transmitted to the NRC the Annual Radiological Environmental Operating Reports (AREORS) for the Callaway Plant in accordance with Technical Specification (TS) 5.6.2, consistent with the objectives outlined in the plant's Offsite Dose Calculation Manual (ODCM) and in

8315 County Road 459 : Steedman, MO 65077 : AmerenMissouri.com

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10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C. During a recent review of these AREORS performed as a corrective action in accordance with the plant's corrective action program, errors were found in some of the descriptions, locations and collection frequencies for environmental samples that had been collected in accordance with the Radiological Environmental Monitoring Program that is described in TS 5.5.1. In response to the identified errors, errata for each of the referenced AREOR submittals have been identified and are provided in the enclosure to this letter.

This letter does not contain new commitments. If there are any questions, please contact Vince D. Miller at (314) 225-1558.

Sincerely,

Roger C. Wink

Manager, Regulatory Affairs

JPK/mlp

Enclosure

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cc: Mr. Scott A. Morris
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U. S. Nuclear Regulatory Commission
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Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)

Ms. Katie Jo Wheeler (DNR)

Year	Page	Section/Table	Description of correction
affected	number	number	•
2013	25	Table 5.2	The Unit 2 pond sampling ceased in 2013. Strike reference to Unit 2 pond in rows 5 and 6, column 'Sample Type'. See CR 202001969.
2013	16	Table 5.1	Strike Unit 2 pond from table. See CR 202001969.
2013	25	Table 5.2	Collection frequency for power block non-potable groundwater wells is monthly. Add footnote 'Collection Frequency' to read the following: Monthly for locations U1MW-936, U1MW-937A, U1MW-937B, U1MW-937C, U1MW-937D, U1MW-937E, U1MW-937F, U1MW-938, U1MW-939R, U1MW-940, U1MW-941, and U1MW-GWS. See CR 202001969.
2013	25	Table 5.2	Strike 'Semiannually' in row 6, column 'Collection Frequency' and replace with 'Quarterly'. See CR 202001969.
2014	17	Table 5.2	The Unit 2 pond sampling ceased in 2013. Strike reference to Unit 2 pond in rows 5 and 6, column 'Sample Type'. See CR 202001969.
2014	17	Table 5.2	Add footnote to indicate 'Well water-potable' Quarterly sampling ceased and Monthly sampling began in August 2014. See CR 202001969.
2014	17	Table 5.2	Collection frequency for power block non-potable groundwater wells is monthly. Add footnote 'Collection Frequency' to read the following: Monthly for locations U1MW-936, U1MW-937A, U1MW-937B, U1MW-937C, U1MW-937D, U1MW-937E, U1MW-937F, U1MW-938, U1MW-939R, U1MW-940, U1MW-941, and U1MW-GWS. See CR 202001969.
2014	17	Table 5.2	Strike 'Semiannually' in row 6, column 'Collection Frequency' and replace with 'Quarterly'. See CR 202001969.
2015	17	Table 5.2	Footnote needed to indicate 'Well water-potable' Monthly sampling ceased in March 2015 and Quarterly sampling resumed.
2015	17	Table 5.2	Collection frequency for power block non-potable groundwater wells is monthly. Add footnote 'Collection Frequency' to read the following: Monthly for locations U1MW-936, U1MW-937A, U1MW-937B, U1MW-937C, U1MW-937D, U1MW-937E, U1MW-937F, U1MW-938, U1MW-939R, U1MW-940, U1MW-941, and U1MW-GWS. See CR 202001969.
2015	17	Table 5.2	Strike 'Semiannually' in row 6, column 'Collection Frequency' and replace with 'Quarterly'. See CR 202001969.
2016	16	Table 5.2	Strike 'Monthly' in row 8, column 'Collection Frequency' for 'Well water-potable'. Replace with 'Quarterly'. Monthly sampling ceased in March 2015. See CR 202001969.
2016	16	Table 5.2	Both UHS and Unit 2 ponds sampling ceased. Strike reference to both ponds in row 5, column 'Sample Type'. Strike row 6 completely. See CR 202001969.
2016	16	Table 5.2	Collection frequency for power block non-potable groundwater wells is monthly. Add footnote 'Collection Frequency' to read the following: Monthly for locations U1 MW-936, U1 MW-9378, U1 MW-937D, U1 MW-939R, U1 MW-940, U1 MW-941, and U1MW-GWS.
2017	16	Table 5.2	Strike 'Monthly' in row 8, column 'Collection Frequency' for 'Well water-potable'. Replace with 'Quarterly'. Monthly sampling ceased in March 2015. See CR 202001969.

Year affected	Page number	Section/Table number	Description of correction		
2017	16	Table 5.2	Both UHS and Unit 2 ponds sampling ceased. Strike reference to both ponds in row 5, column 'Sample Type'. Strike row 6 completely. See CR 202001969.		
2017	16	Table 5.2	Collection frequency for power block non-potable groundwater wells is monthly. Add footnote 'Collection Frequency' to read the following: Monthly for locations U1 MW-936, U1 MW-9378, U1 MW-937D, U1 MW-939R, U1 MW-940, U1 MW-941, and U1MW-GWS.		
2018	16	Table 5.2	Title has wrong monitoring period. Strike '2016' and replace with '2018'		
2018	16	Table 5.2	Strike 'Monthly' in row 8, column 'Collection Frequency' for 'Well water-potable'. Replace with 'Quarterly'. Monthly sampling ceased in March 2015. See CR 202001969.		
2018	16	Table 5.2	Both UHS and Unit 2 ponds sampling ceased. Strike reference to both ponds in row 5, column 'Sample Type'. Strike row 6 completely. See CR 202001969.		
2018	16	Table 5.2	Collection frequency for power block non-potable groundwater wells is monthly. Add footnote 'Collection Frequency' to read the following: Monthly for locations U1 MW-936, U1 MW-9378, U1 MW-937D, U1 MW-939R, U1 MW-940, U1 MW-941, and U1MW-GWS.		
2018	4	Section 3.2	The fourth paragraph, first sentence is not consistent with the description of the sampling frequencies for milk and should read 'Milk samples are collected <i>semi</i> -monthly when animals are on pasture and monthly the rest of the year.' See CR 202001843.		
2018	5	Section 3.3(3)	The narrative is not consistent with the missed samples for the reporting period. The paragraph should read as follows: Edible broadleaf vegetation, collected at the <i>four</i> area gardens was available for harvest May through October 201 8 with the following exceptions: Samples were not available at locations <i>V-9, V-11, V-12, and V-16</i> in April due to the gardens not yet producing. Gardens at locations <i>V-9, V-11, V-12, and V-16</i> were not producing in May. No sample was available at location V-9 for the 8/14/18 collection. No sample was available for location V-11 for the 7/9/18 or the 8/14/18 collection. No vegetables were available at location V-16 for the 8/14/18 or the 10/9/18 collections. Location V-18 (Ward residence) was dropped from the program in 2018 due to poor performance		

Table 5.2. Collection Frequencies and Required Analyses ¹ (January 1 through December 31, 2013)

Sample Type	Media Code	Collection Frequency	Required Analyses
Direct radiation	IDM	Quarterly	Deep Dose Equivalent (DDE)
Airborne iodine	AIO	Weekly	131
Air particulate	APT	Weekly	PGE⁵ each sample
Surface water (river)	SWA	Monthly composite	PGE and ³ H
Surface water (except UHS and Unit 2 ponds)	SWA	Semiannually	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD ⁶ nuclides.
Surface water (UHS and Unit 2 ponds)	SWA	Semiannually Quarterly	PGE and ³ H
Groundwater (not potable)	WWA	Quarterly	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Well water-potable	DWA	Quarterly ⁷	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Shoreline sediment	AQS	Semiannually	PGE
Bottom sediment ²	AQS	Semiannually	PGE
Sludge pond sediment	SOL	Annually	PGE
Soil	SOL	Annually	PGE
Milk animal	MLK	Semimonthly when animals are on pasture, monthly other times ³	PGE and ¹³¹ I
Leafy green vegetables	FPL	Monthly when available 4	PGE and ¹³¹ I
Inedible crops	FC	At time of harvest	PGE and ³ H
Fish	AQF	Semiannually	PGE on edible portion

¹ Samples required by ODCM unless specified otherwise.

² Required by NPDES permit.

³ The grazing season is defined as April 15- December 15, but will vary according to weather conditions.

⁴ The growing season is defined as the months April 1- November 1, but will vary according to weather conditions.

⁵ Principal Gamma Emitters (PGE) are defined as ⁵⁴Mn, ⁵⁹Fe, ⁵⁸Co, ⁶⁰Co, ⁶⁵Zn, ⁹⁵Zr/Nb, ¹³⁴Cs, ¹³⁷Cs, ¹⁴⁰Ba/La and other gamma-emitting nuclides that may be identified during the gamma spectroscopy analysis.

⁶ Hard to Detect (HTD) nuclides are defined as ⁸⁹Sr, ⁹⁰Sr, ⁵⁵Fe, ⁶³Ni, ²³⁷Np, ²³⁸Pu, ²³⁹/²⁴⁰Pu, ²⁴¹Pu, ²⁴¹Am, ²⁴²Cm and ²⁴³/²⁴⁴Cm.

⁷ Monthly for locations U1MW-936, U1MW-937A, U1MW-937B, U1MW-937C, U1MW-937D, U1MW-937E, U1MW-937F, U1MW-938, U1MW-939R, U1MW-940, U1MW-941, and U1MW-GWS.

Table 5.1. Sampling Locations, Wells and Ponds (non-potable water).

Location	Distance /		Sample
Code	Direction ¹	Description	Types ²
U2 MW-12	0.5 mi. ENE	Groundwater Monitoring Well	WWA
U2 MW-16	2.9 mi. SSE	Groundwater Monitoring Well	WWA
UHS	Inside OCA	UHS Pond	SWA
Unit 2 Pond	Inside OCA	Unit 2 Pond	SWA
POND 01	0.6 mi. W	Fishing Pond	SWA
POND 02	0.7 mi. SW	Fishing Pond	SWA
Outfall 010	0.6 mi. N E	Stormwater Run-Off Pond	SWA
Outfall 011	1.0 mi. ENE	Stormwater Run-Off Pond	SWA
Outfall 012	0.5 mi. S	Stormwater Run-Off Pond	SWA
Outfall 013	0.5 mi. S	Stormwater Run-Off Pond	SWA
Outfall 014	0.6 mi. NNW	Stormwater Run-Off Pond	SWA
Outfall 015	0.7 mi. N	Stormwater Run-Off Pond	SWA
Sludge Lagoon # 4	0.8 mi. SSE	On service Sewage Sludge Lagoon	SWA

¹ Distances are measured from the midpoint of the two reactors as described in Final Safety Analysis Report (FSAR) Sec. 2.1.1.1.

² AIO = Air Iodine, APT = Air Particulate, AQF = Fish, AQS = Sediment, FPL = Leafy Green Vegetables, FC = Food Crops, IDM = TLD, MLK = Milk, SOL = Soil, SWA = Surface Water, DWA = Drinking Water, WWA = Ground Water.

³ Control Location.

⁴ The fish collection area for location "A" is between 0.6 and 3.0 river miles upstream of the plant discharge on the north bank. Location "C" is sampled between the discharge area and 1.5 miles downstream of the discharge, on the north bank. The expanded collection areas provide sufficient habitat to collect the required number of species.

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Direct radiation	IDM	Quarterly	Deep Dose Equivalent (DDE)
Airborne iodine	AIO	Weekly	131
Air particulate	APT	Weekly	PGE⁵ each sample
Surface water (river)	SWA	Monthly composite	PGE and ³ H
Surface water (except UHS and Unit 2 ponds)	SWA	Semiannually	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD ⁶ nuclides.
Surface water (UHS and Unit 2 ponds)	SWA	Semiannually Quarterly	PGE and ³ H
Groundwater (not potable)	WWA	Quarterly ⁷	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Well water-potable	DWA	Monthly ⁸	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Shoreline sediment	AQS	Semiannually	PGE
Bottom sediment ²	AQS	Semiannually	PGE
Sludge pond sediment	SOL	Annually	PGE
Soil	SOL	Annually	PGE
Milk animal	MLK	Semimonthly when animals are on pasture, monthly other times ³	PGE and ¹³¹ I
Leafy green vegetables	FPL	Monthly when available 4	PGE and ¹³¹ I
Inedible crops	FC	At time of harvest	PGE and ³ H
Fish	AQF	Semiannually	PGE on edible portion

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⁸ Quarterly sampling ceased and Monthly sampling began in August 2014.

Table 5.2. Collection Frequencies and Required Analyses ¹ (January 1 through December 31, 2015)

Sample Type	Media Code	Collection Frequency	Required Analyses
Direct radiation	IDM	Quarterly	Deep Dose Equivalent (DDE)
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Surface water (except UHS pond)	SWA	Semiannually	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD ⁶ nuclides.
Surface water (UHS pond)	SWA	Semiannually Quarterly	PGE and ³ H
Groundwater (not potable)	WWA	Quarterly ⁷	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Well water-potable	DWA	Monthly ⁸	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Shoreline sediment	AQS	Semiannually	PGE
Bottom sediment ²	AQS	Semiannually	PGE
Sludge pond sediment	SOL	Annually	PGE
Soil	SOL	Annually	PGE
Milk animal	MLK	Semimonthly when animals are on pasture, monthly other times ³	PGE and ¹³¹ I
Leafy green vegetables	FPL	Monthly when available 4	PGE and ¹³¹ I
Inedible crops	FC	At time of harvest	PGE and ³ H
Fish	AQF	Semiannually	PGE on edible portion

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⁸ Monthly sampling ceased in March 2015 and Quarterly sampling resumed.

Table 5.2. Collection Frequencies and Required Analyses ¹ (January 1 through December 31, 2016)

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Surface water (except UHS & Unit 2 ponds) (Onsite ponds)	SWA	Semiannually	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD ⁶ nuclides.
Surface water (UHS and Unit 2 ponds)	SWA	Semiannually	PGE and ³ H
Groundwater (not potable)	WWA	Quarterly ⁷	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Well water-potable	DWA	Monthly Quarterly	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
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 $^{^{7}}$ Monthly for locations U1 MW-936, U1 MW-9378, U1 MW-937D, U1 MW-939R, U1 MW-940, U1 MW-941, and U1MW-GWS.

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Surface water (UHS and Unit 2 ponds)	SWA	Semiannually	PGE and ³ H
Groundwater (not potable)	WWA	Quarterly ⁶	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Well water-potable	DWA	Monthly Quarterly	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Shoreline sediment	AQS	Semiannually	PGE
Bottom sediment ²	AQS	Semiannually	PGE
Sludge pond sediment	SOL	Annually	PGE
Soil	SOL	Annually	PGE
Milk animal	MLK	Semimonthly when animals are on pasture, monthly other times	PGE and ¹³¹ I
Leafy green vegetables	FPL	Monthly when available 3	PGE and ¹³¹
Inedible crops	FC	At time of harvest	PGE and ³ H
Fish	AQF	Semiannually	PGE on edible portion

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³ The growing season is defined as the months April 1- November 1, but will vary according to weather conditions.

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 $^{^5}$ Hard to Detect (HTD) nuclides are defined as 89 Sr, 90 Sr, 55 Fe, 63 Ni, 237 Np, 238 Pu, 239 / 240 Pu, 241 Pu, 241 Am, 242 Cm and 243 / 244 Cm.

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Surface water (UHS and Unit 2 ponds)	SWA	Semiannually	PGE and ³ H
Groundwater (not potable)	WWA	Quarterly ⁶	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Well water-potable	DWA	Monthly Quarterly	PGE and ³ H. If contaminated with gamma emitting nuclides of plant origin, analyze for HTD nuclides.
Shoreline sediment	AQS	Semiannually	PGE
Bottom sediment ²	AQS	Semiannually	PGE
Sludge pond sediment	SOL	Annually	PGE
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Milk animal	MLK	Semimonthly when animals are on pasture, monthly other times	PGE and ¹³¹ I
Leafy green vegetables	FPL	Monthly when available 3	PGE and ¹³¹ I
Inedible crops	FC	At time of harvest	PGE and ³ H
Fish	AQF	Semiannually	PGE on edible portion

¹ Samples required by ODCM unless specified otherwise.

² Required by NPDES permit.

³ The growing season is defined as the months April 1- November 1, but will vary according to weather conditions.

⁴ Principal Gamma Emitters (PGE) are defined as ⁵⁴Mn, ⁵⁹Fe, ⁵⁸Co, ⁶⁰Co, ⁶⁵Zn, ⁹⁵Zr/Nb, ¹³⁴Cs, ¹³⁷Cs, ¹⁴⁰Ba/La and other gamma- emitting nuclides that may be identified during the gamma spectroscopy analysis.

 $^{^5}$ Hard to Detect (HTD) nuclides are defined as $^{89} \rm Sr,~^{90} Sr,~^{55} Fe,~^{63} Ni,~^{237} Np,~^{238} Pu,~^{239} /^{240} Pu,~^{241} Pu,~^{241} Am,~^{242} Cm$ and $^{243} /^{244} Cm$.

⁶ Monthly for locations U1 MW-936, U1 MW-9378, U1 MW-937D, U1 MW-939R, U1 MW-940, U1 MW-941, and U1MW-GWS.

3.2 <u>Program Description</u>

The sampling and analysis schedules for the environmental radiological monitoring program at the Callaway Energy Center are summarized in Tables 5.1 and 5.2 and briefly reviewed below. Table 5.1 identifies sampling locations and specifies as to type (indicator or control) and its distance, and direction relative to the reactor site. The types of samples collected at each location, required analyses and the frequency of collections are presented in Table 5.2.

To monitor the air environment, airborne particulate and airborne iodine samples are collected by continuous pumping, at six locations. The airborne particulates are collected on glass fiber filters and the airborne iodine through activated charcoal cartridges. Both filters and cartridges are exchanged weekly. Airborne particulates are analyzed for gamma-emitting isotopes. Charcoal cartridges are analyzed for iodine-131.

The ingestion pathway is monitored by sampling of milk (if available), fish and green leafy vegetation.

Milk samples are collected monthly when animals are on pasture and monthly the rest of the year. There were no milk indicator stations identified by the Land Use Census for the subject year. The control station continued to be collected. Samples are analyzed for iodine-131 and gamma-emitting isotopes.

Monthly during the growing season, edible green leafy vegetation is collected from both indicator and control locations. Vegetation samples typically consist of mustard greens, turnip greens, cabbage, lettuce, collards, radish greens, swiss chard, broccoli and poke. Other edible broad leaf vegetation is collected if primary varieties are not available. The samples are analyzed for iodine-131 and other gamma-emitting isotopes.

Feed crops (soybeans, sorghum, corn) are collected from locations FC-1 through FC-4. FC-1, FC-2 and FC-3 are located on Ameren property traversed by the discharge pipeline. The samples are collected at harvest and analyzed for tritium and gamma emitting isotopes. FC-4 is a control location, beyond the influence of plant operations. Feed crops are grown for animal feed and not for human consumption. The soybean field for sample FC-1 is planted by the Missouri State Department of Conservation (MODOC) to provide feed to wildlife living in the Reform Wildlife Conservation Area. MODOC did not plant the field this year and there was no crop to sample.

The waterborne pathway is monitored by sampling surface water, groundwater and drinking water, and bottom and shoreline sediments. Water samples are analyzed for tritium and gamma-emitting isotopes, and sediments are analyzed for gamma-emitting isotopes.

The waterborne pathway is also monitored by upstream and downstream semiannual collections of fish. The five most abundant recreational or commercial fish species are collected. Samples are analyzed for gamma-emitting isotopes.

Monthly composite samples of surface water from the Missouri River are collected from one indicator location (S02) and from one control location (S01). The surface water samples are composites of daily collections by automatic river samplers.

Onsite surface water from nine ponds is analyzed for tritium and gamma-emitting isotopes. The collection frequencies are semiannually.

To monitor possible sources of ground water contamination due to plant operations, non-potable ground water samples were collected monthly or quarterly from well locations both onsite and along the discharge pipeline. The samples were analyzed for tritium and gamma-emitting isotopes.

3.2 <u>Program Description (continued)</u>

Potable well water samples are collected quarterly from the plant drinking water supply, neighboring property owners, and from the town of Portland, MO. The samples were analyzed for tritium and gamma-emitting isotopes.

River bottom sediment is collected semiannually at the plant's intake (A) and discharge (C). The samples are taken from water at least 2 meters deep to prevent influence of bank erosion. Shoreline sediments are collected semiannually in the same area as bottom sediment. These samples are collected within two feet of the edge of the water. The samples are analyzed for gamma-emitting isotopes.

The direct ambient gamma radiation pathway is also considered. This exposure is monitored by thermoluminescent dosimeters (TLDs) at forty-four locations in and around the Callaway site. The TLDs are placed in 16 sectors around the plant as specified in the ODCM-RECS. Five of the TLD stations have neutron monitoring capability and three locations are designated as controls. TLDs are exchanged and analyzed quarterly.

Soil is collected annually from seven indicator locations (F2, PR3, F6, PR7, W2, W3, and W4) and two control locations (M9, W1) to monitor the terrestrial environment. The samples are analyzed for gamma-emitting isotopes.

3.3 <u>Program Execution</u>

The program was executed as described in the preceding section with the following exceptions.

(1) Airborne Particulates and Iodine.

The Air sampler station A-11 found not operating 3/28/18, samples had lower volume (CR 201801634). Air station A8 was found not running 6/6/18 for about 16 hours (CR 201802861).

(2) Ground Water:

Water was frozen during the 1/16/18 collection event inside the old blowdown line. The well was dry for the 1/20/18 collection event at location U1MW-047 (CR 201801736).

(3) Broadleaf Vegetation:

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Edible broadleaf vegetation, collected at the five area gardens was available for harvest May through October 2018 with the following exceptions: Samples were not available at locations V-9,,V-11, V-12,V-16 in April due to the gardens not yet producing. Gardens at locations V-11 and V-16, were not producing in May. No sample was available at location V-9 for the 8/14/18 collection. No sample was available for location V-11 for the 7/9/18 or the 8/14/18 collection. No vegetables were available at location V-16 for the 8/14/18 or the 10/9/18 collections. Location V-18 (Ward residence) was dropped from the program in 2018 due to poor performance.

V-9, V-11, V-12, and V-16

and

(4) Inedible crops:

Inedible crops were not collected at location FC-1 during the 2018 collection due to the field not being planted.

(5) Milk:

Milk sampling was discontinued at location M-9 after the 4/24/18 sampling event due to the lack of an indicator location. Vegetation sampling is sufficient to comply with the requirements of the ODCM.