

Serial: RNP-RA/07-0025

APR 1 8 2007

United States Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 DOCKET NO. 50-261/LICENSE NO. DPR-23

#### 2006 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Ladies and Gentlemen:

Attached is the Annual Radioactive Effluent Release Report for the period of January 1, 2006, through December 31, 2006, for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. This report is submitted in accordance with 10 CFR 50.36a(a)(2) and the HBRSEP, Unit No. 2, Technical Specifications Section 5.6.3.

If you have any questions concerning this report, please contact me at 843-857-1253.

Sincerely.

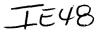
C. T. Baucom Supervisor - Licensing/Regulatory Programs

RAC/rac

Attachment

c: Dr. W. D. Travers, NRC, Region II Ms. L. M. Regner, NRC, NRR (w/o Attachment) NRC Resident Inspector

> Progress Energy Carolinas, Inc. Robinson Nuclear Plant 3581 West Entrance Road Hartsville, SC 29550



United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 1 of 38

# EFFLUENT AND WASTE DISPOSAL

#### ANNUAL REPORT

January 1, 2006 - December 31, 2006

#### PROGRESS ENERGY CAROLINAS

# H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

# FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

£

# TABLE OF CONTENTS

		Descr	iption	<u>Page</u>
	I.	EXEC	CUTIVE SUMMARY	4
		A.	Discussion	4
		B.	Significant Variances	8
		C.	Regulatory Compliance	8
	II.	SUPP	LEMENTAL INFORMATION	9
		A.	Regulatory Limits	9
		B.	Measurements and Approximations of Total Radioactivity	10
		C.	Estimated Total Errors	11
	III.	GASE	EOUS EFFLUENTS	12
		A.	Batch Releases	12
		B.	Abnormal Releases	12
		C.	Data Tables	12
	IV.	LIQU	ID EFFLUENTS	18
		A.	Batch Releases	18
		B.	Abnormal Releases	18
		C.	Data Tables	
	V.	SOLII	D WASTE AND IRRADIATED FUEL SHIPMENTS	24
		A.	Waste Class A	24
		B.	Waste Class B	26
•		C.	Waste Class C	
	VI.	40 CF	R 190 DOSE CONFORMANCE	30
	VII.	METH	EOROLOGICAL DATA	30
		A.	Continuous Release Diffusion Analysis	30

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 3 of 38

# LIST OF TABLES

<u>Table</u>	Description	<u>Page</u>
Table III-A	Gaseous Effluents - Summation of All Releases	13
Table III-B	Gaseous Effluents - Ground Level and Mixed Mode Releases	15
Table III-C	Typical Lower Limits of Detection for Gaseous Effluents	17
Table IV-A	Liquid Effluents - Summation of All Releases	19
Table IV-B	Liquid Effluents - Continuous Mode and Batch Mode Releases	21
Table IV-C	Typical Lower Limits of Detection for Liquid Effluents	23
Table VII-A	Joint Occurrence Frequencies for LOWNDDEG and LOWNDSPD -	-
	Continuous Releases	31

#### I. EXECUTIVE SUMMARY

- A. Discussion
  - 1. Effluent Controls

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Offsite Dose Calculation Manual specifies controls and dose limits pertaining to releases of radioactivity to the environment. None of these controls or dose limits were exceeded during 2006.

2. Protection Standards

The main objective in the control of radiation is to ensure that any exposure is kept not only within regulatory limits, but As Low As Reasonably Achievable (ALARA). The ALARA concept applies to reducing radiation exposure both to workers at HBRSEP, Unit No. 2, and to the general public. "Reasonably achievable" means that radiation exposure reduction is based on sound environmental practices, economic decisions, and operating practices. By practicing ALARA, HBRSEP and Progress Energy Carolinas, Inc., minimize health risk and environmental detriment, and ensure that exposures are maintained well below regulatory limits.

3. Sources of Radioactivity Released

During normal operations of a nuclear power station, most of the fission products are retained within the fuel and fuel cladding. However, small quantities of radioactive fission and activation products are present in the reactor coolant water. The types of radioactive material released are noble gases, iodines and particulates, and tritium.

The noble gas fission products in the reactor coolant water are released as a gas when the coolant is depressurized. These gases are collected by a system designed for collection and storage for radioactive decay prior to release to the environment.

Small releases of radioactivity in liquids may occur from equipment associated with the reactor coolant system. These liquids are collected and processed for radioactivity removal, prior to and during release.

4. Noble Gas

Some of the fission products released in airborne effluents are radioactive isotopes of noble gases, such as argon and xenon. Noble gases are by nature inert and do not concentrate in humans or other organisms. Noble gases contribute to human radiation exposure as external exposure. United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 5 of 38

#### 5. Iodines and Particulates

There were no measurable releases of gaseous iodine or particulates with halflives greater than eight days during the year. Factors such as chemical reactivity and solubility in water, combined with high processing efficiencies, minimize their discharge. The main contribution of radioactive iodine to human exposure is to the thyroid gland, where the body concentrates iodine. The particulates contribute to internal exposure of tissues such as the muscle, liver, and intestines. These particulates can also be a source of exposure if deposited on the ground.

6. Tritium

Tritium, a radioactive isotope of hydrogen, is the predominate radionuclide in liquid and gaseous effluents. Tritium is produced in the reactor via a number of processes. Tritium is a weak beta particle emitter and contributes very little radiation exposure to the human body, and when tritium is inhaled, ingested, or absorbed it is dispersed throughout the body until eliminated.

7. Processing and Monitoring

Effluents are strictly controlled and monitored to ensure that radioactivity released to the environment is minimal and within regulatory limits. Effluent controls include the operation of radiation monitoring systems, in-plant and environmental sampling and analyses, quality assurance programs for both in-plant and environmental sampling and analyses, and procedures that address effluent and environmental monitoring.

The plant radiation monitoring system provides monitors that are designed to ensure that all releases are below regulatory limits. Each instrument provides indication of the amount of radioactivity present and is equipped with alarms and indicators in the control room. The alarm setpoints are set below the regulatory limits, i.e., typically at less than 50 percent of the regulatory limit, to ensure that the limits are not exceeded. If a monitor alarms, a release to the environment from a tank is automatically suspended. Additionally, releases are sampled and analyzed in the laboratory prior to discharge to the environment. The sampling and analysis done in the laboratory provides a more sensitive and precise method of determining pre-effluent composition than in-plant monitoring instruments.

The plant has a meteorological tower, which is linked to computers that record the meteorological data. This meteorological data and the results of the Land Use Census are used to verify the ground level dispersion factors contained in the ODCM that are used in calculating the dose to the public.

In addition to in-plant equipment, the company maintains a Radiological Environmental Monitoring Program, which consists of devices used to sample the air and water in the environment. The samples collected from the surrounding environment are analyzed to determine the presence of radioactive material in the environment.

8. Exposure Pathways

Radiological exposure pathways are the methods by which people may become exposed to radioactive material. The major pathways of concern are those which could cause the highest calculated radiation dose. The projected pathways are determined from the type and amount of radioactive material that may have been released, the environmental transport mechanism, and the use of the environment.

Environmental transport mechanisms include, but are not limited to, hydrological (i.e., water) and meteorological (i.e., weather) characteristics of the area. Information on water flow, wind speed and direction, dietary intake of residents, recreational use of the area, and location of homes and farms in the area are some of the many factors used to calculate the potential exposure to offsite personnel.

The release of radioactive gaseous effluents includes pathways such as external whole body exposure, deposition on plants and soils, and human inhalation. The release of radioactive material in liquid effluents includes pathways such as fish consumption, and direct exposure from the lake at the shoreline and while swimming.

Even though radionuclides can reach humans by many different pathways, some radionuclides result in more exposure than others. The critical pathway is the one that, for a specific radionuclide, will result in the greatest exposure to a population, or a specific group of the population, called the critical group. The critical group may vary depending on the radionuclides involved, the age and diet of the group, and other cultural factors. The exposure may be received by the whole body or to a specific organ, with the organ receiving the largest fraction of the exposure called the critical organ.

The exposures to the general public in the area surrounding HBRSEP, Unit No. 2, are calculated for gaseous and liquid releases. The exposure due to radioactive material released in gaseous effluents is calculated using factors such as the amount of radioactive material released, the concentration beyond the site boundary, locations of exposure pathways, and usage factors. The exposures calculated due to radioactive materials released in liquid effluents are calculated using factors such as the total volume of liquid, the total volume of dilution water, field irrigation, and usage factors.

9. Plant Operation

With the exception of a brief two day outage in October of 2006, HBRSEP, Unit No. 2, operated continuously during 2006. Continued good fuel and reactor coolant system integrity kept gaseous and liquid effluent totals relatively low in 2006.

10. Results

The Radioactive Effluent Release Report is a detailed listing of the radioactivity released from the HBRSEP, Unit No. 2, during the period from January 1, 2006 through December 31, 2006. Some of the gaseous and liquid release parameters for this reporting period are summarized below:

GASEOUS EFFLUENTS	<u>Units</u>	<u>1st Qtr</u>	2nd Qtr	<u>3rd Qtr</u>	<u>4th Qtr</u>
Fission & Act. Gas	Ci	2.80E-02	2.65E-02	2.40E-02	2.73E-02
I-131	Ci	< LLD	< LLD	< LLD	< LLD
Part. >8 Day Half-Lives	Ci	< LLD	< LLD	< LLD	< LLD
Tritium	Ci	2.43E+00	2.87E+00	2.80E+00	2.31E+00
LIQUID EFFLUENTS	<u>Units</u>	<u>1st Qtr</u>	2nd Qtr	<u>3rd Qtr</u>	<u>4th Qtr</u>
Fission & Act. Products	Ci	1.94E-03	1.61E-03	8.02E-04	6.77E-04
Tritium	Ci	4.93E+00	3.40E+01	1.15E+02	1.70E+02
Dilution Volume	Liters	2.59E+11	2.84E+11	2.91E+11	2.87E+11
Waste Volume	Liters	6.74E+04	1.87E+05	3.85E+05	9.45E+06

During the period of January 1, 2006 through December 31, 2006, the estimated maximum individual offsite dose due to radioactivity released in effluents was:

Liquid Effluents:

•	Total Body Dose	0.000354 millirem
•	Critical Organ Dose	0.000356 millirem, GI-LLI <sup>1</sup>

Gaseous Effluents:

- Beta Air Dose 0.000883 millirad
- Gamma Air Dose 0.00250 millirad
  - Critical Organ Dose 0.143 millirem, All specified<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> GI-LLI, gastrointestinal-lower large intestine

<sup>&</sup>lt;sup>2</sup> No critical organ was identified as receiving the highest dose. The ODCM specified organs of bone, liver, total body, thyroid, kidney, lung and GI-LLI all received an equal dose.

- B. Significant Variances
  - 1. No variances in historical data of significance were identified during this period.
- C. Regulatory Compliance
  - 1. The 10 CFR 50, Appendix I, doses were calculated using the Canberra Effluent Management System (EMS<sup>1</sup>). The EMS Software provides day-by-day dose estimates that are conservative because all releases are assigned to the limiting receptor, using the continuous ground level dispersion factors calculated from 1978 meteorology. When projected on a day-by-day basis, utilizing conservative meteorological conditions, the dose commitment from gaseous and liquid effluents is a small fraction of the 10 CFR 50, Appendix I, limits. The direct radiation assessment to the most likely exposed member of the public is reported in the Annual Radiological Environmental Operating Report. During 2006, the results of the direct radiation assessment demonstrated no measurable effect above background for plant operations.
  - 2. There were no changes to the waste solidification Process Control Program (PCP) during this reporting period. See page 36.
  - 3. There were no changes to the Radioactive Waste Systems (i.e., liquid, gaseous, or solid) during this reporting period. See page 36.
  - 4. There were no reportable instrumentation inoperability events during this reporting period. See page 36.
  - 5. There were no outside liquid holdup tanks that exceeded the 10 curie limit during this reporting period. See page 36.
  - 6. There were no Waste Gas Decay Tanks that exceeded the 1.9E+04 curie limit during this reporting period. See page 36.
  - 7. There were no instances of missed compensatory samples during this reporting period. See page 36.
  - 8. There was one revision to the ODCM during this reporting period. See page 34.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 9 of 38

9. There were no dose calculations performed or special reports made as a result of any spills or leaks during this period. See page 36.

#### II. SUPPLEMENTAL INFORMATION

- A. Regulatory Limits
  - 1. Fission and Activation Gases:

10 CFR 20 Limits (Instantaneous Release Rate) Total Body Dose ≤500 mrem/yr Skin Dose ≤3000 mrem/yr 10 CFR 50, Appendix I For Calendar Quarter Gamma Dose ≤5 mrad Beta Dose ≤10 mrad For Calendar Year Gamma Dose ≤10 mrad Beta Dose ≤20 mrad

2. Iodine-131 and 133, Tritium, and Particulates >8 day half-lives:

 10 CFR 20 Limits (Instantaneous Release Rate) Dose from Inhalation (only) to a child to any organ ≤1500 mrem/yr
 10 CFR 50, Appendix I (Organ Doses) For Calendar Quarter ≤7.5 mrem For Calendar Year ≤15 mrem

3. Liquids:

Concentrations are specified in 10 CFR 20, Appendix B, Table 2, Column 2, for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2.00E-04  $\mu$ Ci/ml total activity.

10 CFR 50, Appendix I

For Calendar Quarter Total Body Dose ≤1.5 mrem Any Organ Dose ≤5 mrem For Calendar Year Total Body Dose ≤3 mrem Any Organ Dose ≤10 mrem

- B. Measurements and Approximations of Total Radioactivity
  - 1. Continuous Gaseous Releases
    - a) Fission and Activation Gases The total activity released is determined from the net count rate of the gaseous monitor, its calibration factor, and the total exhaust flow. The activity of radioactive gas is determined by the fraction of that radioactive gas in the isotopic analysis for that period.
    - b) Iodines The activity released as Iodine-131, 133, and 135 is based on isotopic analysis of the charcoal cartridge and particulate filter, and the total exhaust flow.
    - c) Particulates The activity released via particulates with half-lives greater than eight days is determined by isotopic analysis of particulate filters and the total exhaust flow.
    - d) Tritium The activity released as tritium is based on weekly grab sample analysis and total exhaust flow.
  - 2. Batch Gaseous Releases
    - a) Fission and Activation Gases The activity released is based on the volume released and the activity of the individual nuclides obtained from an isotopic analysis of the grab sample taken prior to the release.
    - b) Iodines The iodines from mixed mode batch releases are included in the iodine determination from the mixed mode continuous Reactor Auxiliary Building release.
    - c) Particulates The particulates from mixed mode batch releases are included in the particulate determination from the mixed mode continuous Reactor Auxiliary Building release.
    - d) Tritium The activity released as tritium is based on the grab sample analysis of each batch and the batch volume.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 11 of 38

- 3. Liquid Releases
  - a) Fission and Activation Products The total release values (not including tritium, gases, and alpha) are comprised of the sum of the individual radionuclide activities in each release to the discharge canal for the respective quarter. These values represent the activity known to be present in the liquid radwaste effluent.
  - b) Tritium The activity released as tritium is based on the grab sample analysis of each batch and the batch volume. For continuous releases, the activity released as tritium is based on analysis of a weekly composite sample. For continuous releases without a composite sampler, the tritium activity is based on analysis of daily grab samples.
  - c) Alpha The measured alpha concentration in a monthly composite sample is used to calculate the total release and average diluted concentration during each period.
  - d) Strontium-89, 90, and Iron-55 The total release values are measured quarterly from composite samples.
- C. Estimated Total Errors
  - 1. Estimated total errors for gaseous effluents are based on uncertainties in counting equipment calibration, counting statistics, exhaust flow rates, exhaust sample flow rates, non-steady release rates, chemical yield factors, and sample losses for such items as charcoal cartridges.
  - 2. Estimated total errors for liquid effluents are based on uncertainties in counting equipment calibration, counting statistics, non-steady release flow rate, sampling and mixing losses, and volume determinations.
  - 3. Estimated total errors for solid waste are based on uncertainties in equipment calibration, dose rate measurements, geometry, and volume determinations.

# United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 12 of 38

# III. GASEOUS EFFLUENTS

#### A. Batch Releases

	Jan - June 2006	July - Dec 2006
Number of batch releases	47	41
Total time period for batch releases	1.81E+04 min	1.45E+04 min
Maximum time period for a batch release	1.02E+03 min	4.94E+02 min
Average time period for a batch release	3.86E+02 min	3.54E+02 min
Minimum time period for a batch release	5.00E+00 min	2.90E+01 min

٠

#### B. Abnormal Releases

	Jan - June 2006	July - Dec 2006
Number of releases	0.00E+00	0.00E+00
Total activity released	0.00E+00 Ci	0.00E+00 Ci

# C. Data Tables

The following tables provide the details of gaseous releases:

Table III-A	Summation of All Releases
Table III-B	Ground Level and Mixed Mode Releases
Table III-C	Typical Lower Limits of Detection for Gaseous Effluents

#### <u>TABLE III-A</u> <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006</u> <u>GASEOUS EFFLUENTS - SUMMATION OF ALL RELEASES</u>

		Unit	Quarter 1	Quarter 2	Est. Total Error %
A.	Fission and Activation Gases				
	1. Total release	Ci	2.80E-02	2.65E-02	3.63E+01
	2. Average release rate for period	µCi/sec	3.60E-03	3.37E-03	
B.	Iodines			-	
	1. Total Iodine-131	Ci	< LLD	< LLD	1.74E+01
	2. Average release rate for period	µCi/sec	< LLD	< LLD	
C.	Particulates				
	1. Particulates with half-lives >8 days	Ci	< LLD	< LLD	1.05E+01
	2. Average release rate for period	µCi/sec	< LLD	< LLD	
	3. Gross alpha radioactivity	Ci	< LLD	< LLD	
D.	Tritium				-
	1. Total release	Ci	2.43E+00	2.87E+00	2.31E+01
	2. Average release rate for period	µCi/sec	3.13E-01	3.65E-01	
E.	Percent of 10 CFR 50, Appendix I				-
	<ol> <li>Quarterly limit Gamma air Beta air Organ: All specified<sup>1</sup></li> </ol>	% % %	1.33E-02 2.35E-03 4.45E-01	1.26E-02 2.22E-03 5.25E-01	
-	<ol> <li>Annual limit Gamma air Beta air Organ: All specified <sup>1</sup></li> </ol>	% % %	6.66E-03 1.18E-03 2.23E-01	1.29E-02 2.28E-03 4.85E-01	

<sup>\*</sup>Cumulative total for the year-to-date using the methodology in the ODCM.

<sup>1</sup> No critical organ was identified as receiving the highest dose. The ODCM specified organs of bone, liver, total body, thyroid, kidney, lung and GI-LLI all received an equal dose.

#### <u>TABLE III-A</u> (Continued) <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006</u> <u>GASEOUS EFFLUENTS - SUMMATION OF ALL RELEASES</u>

		Unit	Quarter	Quarter 4	Est. Total Error %
			3	4	Error %
A.	Fission and Activation Gases				
	1. Total release	Ci	2.40E-02	2.73E-02	3.63E+01
	2. Average release rate for period	μCi/sec	3.02E-03	3.43E-03	
B.	Iodines				
	1. Total Iodine-131	Ci	< LLD	< LLD	1.74E+01
	2. Average release rate for period	µCi/sec	< LLD	< LLD	
C.	Particulates				_
	1. Particulates with half-lives >8 days	Ci	< LLD	< LLD	1.05E+01
	2. Average release rate for period	µCi/sec	< LLD	< LLD	
	3. Gross alpha radioactivity	Ci	< LLD	< LLD	
D.	Tritium				
	1. Total release	Ci	2.80E+00	2.31E+00	2.31E+01
	2. Average release rate for period	µCi/sec	3.52E-01	2.91E-01	
E.	Percent of 10 CFR 50, Appendix I				_
	<ol> <li>Quarterly limit Gamma air Beta air Organ: All specified <sup>1</sup></li> </ol>	% % %	1.14E-02 2.01E-03 5.13E-01	1.26E-02 2.25E-03 4.24E-01	
	<ol> <li>Annual limit Gamma air Beta air Organ: All specified <sup>1</sup></li> </ol>	% % %	1.87E-02 3.29E-03 7.42E-01	2.50E-02 4.41E-03 9.54E-01	

\*Cumulative total for the year-to-date using the methodology in the ODCM.

<sup>1</sup> No critical organ was identified as receiving the highest dose. The ODCM specified organs of bone, liver, total body, thyroid, kidney, lung and GI-LLI all received an equal dose.

#### <u>TABLE III-B</u> <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006</u> <u>GASEOUS EFFLUENTS - GROUND LEVEL AND MIXED MODE RELEASES</u>

		Continuous Mode		Batch Mode	
Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 1	Quarter 2
1. Fission Gases					
Ar-41	Ci	<lld< td=""><td><lld< td=""><td>2.79E-02</td><td>2.64E-02</td></lld<></td></lld<>	<lld< td=""><td>2.79E-02</td><td>2.64E-02</td></lld<>	2.79E-02	2.64E-02
Xe-133	Ci	<lld< td=""><td><lld< td=""><td>5.23E-06</td><td>7.99E-05</td></lld<></td></lld<>	<lld< td=""><td>5.23E-06</td><td>7.99E-05</td></lld<>	5.23E-06	7.99E-05
Total for Period	Ci	<lld< td=""><td><lld< td=""><td>2.80E-02</td><td>2.65E-02</td></lld<></td></lld<>	<lld< td=""><td>2.80E-02</td><td>2.65E-02</td></lld<>	2.80E-02	2.65E-02
2. Iodines <sup>1</sup>					
I-131	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
I-133	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
Total for Period	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
3. Particulates <sup>1</sup>				_	
Co-60	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
Cs-137	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
Total for Period	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>

<sup>1</sup>Mixed mode continuous accountability includes mixed mode batch accountability (excludes tritium).

# TABLE III-B<br/>(Continued)EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006GASEOUS EFFLUENTS - GROUND LEVEL AND MIXED MODE RELEASES

		Continuous Mode		Batch Mode	
Nuclides Released	Unit	Quarter 3	Quarter 4	Quarter 3	Quarter 4
1. Fission Gases		-	-	_	
Ar-41	Ci	<lld< td=""><td><lld< td=""><td>2.40E-02</td><td>2.65E-02</td></lld<></td></lld<>	<lld< td=""><td>2.40E-02</td><td>2.65E-02</td></lld<>	2.40E-02	2.65E-02
Xe-133	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td>7.91E-04</td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td>7.91E-04</td></lld<></td></lld<>	<lld< td=""><td>7.91E-04</td></lld<>	7.91E-04
Xe-135	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td>2.99E-06</td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td>2.99E-06</td></lld<></td></lld<>	<lld< td=""><td>2.99E-06</td></lld<>	2.99E-06
Total for Period	Ci	<lld< td=""><td><lld< td=""><td>2.40E-02</td><td>2.73E-02</td></lld<></td></lld<>	<lld< td=""><td>2.40E-02</td><td>2.73E-02</td></lld<>	2.40E-02	2.73E-02
2. Iodines <sup>1</sup>					
I-131	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
I-133	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
Total for Period	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
3. Particulates <sup>1</sup>			_	_	
Co-60	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
Cs-137	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>
Total for Period	Ci	<lld< td=""><td><lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""><td><lld< td=""></lld<></td></lld<></td></lld<>	<lld< td=""><td><lld< td=""></lld<></td></lld<>	<lld< td=""></lld<>

<sup>1</sup>Mixed mode continuous accountability includes mixed mode batch accountability (excludes tritium).

TABLE III-C
TYPICAL LOWER LIMITS OF DETECTION FOR GASEOUS EFFLUENTS

2.54E-09
2.48E-08
1.48E-14
1.51E-14
3.11E-14
2.88E-14
2.38E-14
1.06E-13
5.43E-06
1.40E-08
2.98E-08
3.79E-08
2.43E-15
1.18E-15
2.03E-13
1.71E-14
4.67E-07
1.75E-13
2.78E-08
1.06E-07
1.63E-14
6.04E-11
8.85E-09
6.43E-08
1.94E-14
7.02E-08
3.84E-14
2.12E-14
1.65E-14
6.87E-14
4.45E-15

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 18 of 38

# IV. LIQUID EFFLUENTS

#### A. Batch Releases

	Jan - June 2006	July - Dec 2006
Number of batch releases	8	26
Total time period for batch releases	1.65E+03 min	5.53E+03 min
Maximum time period for a batch release	2.40E+02 min	4.21E+02 min
Average time period for a batch release	2.07E+02 min	2.13E+02 min
Minimum time period for a batch release	1.26E+02 min	1.46E+02 min
Average stream flow during release periods	5.50E+05 gpm	5.76E+05 gpm

#### B. Abnormal Releases

	Jan - June 2006	July - Dec 2006
Number of releases	0.00E+00	0.00E+00
Total activity released	0.00E+00 Ci	0.00E+00 Ci

# C. Data Tables

The following tables provide the details of liquid releases:

Table IV-A	Summation of All Releases
Table IV-B	Continuous Mode and Batch Mode Releases
Table IV-C	Typical Lower Limits of Detection for Liquid Effluents

# TABLE IV-AEFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES

		Unit	Quarter 1	Quarter 2	Est. Total Error %
A.	Fission and Activation Products				
	<ol> <li>Total release (not including tritium, gases, alpha)</li> </ol>	Ci	1.94E-03	1.61E-03	1.07E+01
	2. Average diluted concentration during period	µCi/ml	7.50E-12	5.66E-12	
B.	Tritium				
	1. Total release	Ci	4.93E+00	3.40E+01	9.20E+00
	2. Average diluted concentration during period	µCi/ml	1.90E-08	1.20E-07	<b></b>
C.	Dissolved and entrained gases				
	1. Total release	Ci	<lld< td=""><td><lld< td=""><td>9.60E+00</td></lld<></td></lld<>	<lld< td=""><td>9.60E+00</td></lld<>	9.60E+00
	2. Average diluted concentration during period	µCi/ml	<lld< td=""><td><lld< td=""><td>U</td></lld<></td></lld<>	<lld< td=""><td>U</td></lld<>	U
	3. Percent of applicable limit	%	<lld< td=""><td><lld< td=""><td></td></lld<></td></lld<>	<lld< td=""><td></td></lld<>	
D.	Gross alpha radioactivity				
	1. Total release	Ci	<lld< td=""><td><lld< td=""><td>1.83E+01</td></lld<></td></lld<>	<lld< td=""><td>1.83E+01</td></lld<>	1.83E+01
				<b></b>	1
E.	Volume of waste released prior to dilution	Liters	6.74E+04	1.87E+05	
F.	Volume of dilution water used during period	Liters	2.59E+11	2.84E+11	
G.	Percent of 10 CFR 50, Appendix I				
	<ol> <li>Quarterly Limit Organ: GI-LLI Organ: Liver Total body</li> </ol>	% % %	3.31E-06 N/A 9.21E-06	N/A 4.02E-05 1.10E-04	
	<ol> <li>Annual Limit Organ: GI-LLI Organ: Liver Total body</li> </ol>	% % %	1.66E-06 N/A 4.60E-06	N/A 2.15E-05 5.95E-05	

<sup>\*</sup>Cumulative total for the year-to-date using the methodology in the ODCM.

# TABLE IV-A<br/>(Continued)EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES

				T	<del>۱</del>
		Unit	Quarter 3	Quarter 4	Est. Total Error %
A.	Fission and Activation Products				
	1. Total release (not including tritium, gases, alpha)	Ci	8.02E-04	6.77E-04	1.07E+01
	2. Average diluted concentration during period	µCi/ml	2.76E-12	2.36E-12	
B.	Tritium				
	1. Total release	Ci	1.15E+02	1.70E+02	9.20E+00
	2. Average diluted concentration during period	µCi/ml	3.95E-07	5.90E-07	
C.	Dissolved and entrained gases				
	1. Total release	Ci	6.14E-06	2.77E-05	9.60E+00
	2. Average diluted concentration during period	µCi/ml	2.11E-14	9.66E-14	
	3. Percent of applicable limit	%	1.06E-08	4.83E-08	
D.	Gross alpha radioactivity				I
	1. Total release	Ci	<lld< td=""><td><lld< td=""><td>1.83E+01</td></lld<></td></lld<>	<lld< td=""><td>1.83E+01</td></lld<>	1.83E+01
					_
E.	Volume of waste released prior to dilution	Liters	3.85E+05	9.45E+06	
				· · · · · · · · · · · · · · · · · · ·	
F.	Volume of dilution water used during period	Liters	2.91E+11	2.87E+11	
G.	Percent of 10 CFR 50, Appendix I				
	<ol> <li>Quarterly Limit         Organ: Liver         Organ: GI-LLI         Total body     </li> </ol>	% % %	1.61E-04 N/A 5.03E-04	N/A 6.94E-03 2.30E-02	
	<ol> <li>Annual Limit</li> <li>Organ: Liver</li> <li>Organ: GI-LLI</li> <li>Total body</li> </ol>	% % %	1.02E-04 N/A 3.11E-04	N/A 3.56E-03 1.18E-02	

\*Cumulative total for the year-to-date using the methodology in the ODCM.

### <u>TABLE IV-B</u> <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006</u> <u>LIQUID EFFLUENTS - CONTINUOUS MODE AND BATCH MODE RELEASES</u>

		Continuous Mode		Batch	Mode
Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 1	Quarter 2
				• • • • • • • • • • • • • • • • • • • •	· · · · · · · · · · · · · · · · · · ·
H-3	Ci	< LLD	< LLD	4.93E+00	3.40E+01
					·
Cr-51	Ci	< LLD	< LLD	2.10E-05	< LLD
Co-60	Ci	< LLD	< LLD	4.38E-05	4.92E-04
Ni-63	Ci	N/A <sup>1</sup>	< LLD	N/A <sup>1</sup>	1.73E-04
Sb-124	Ci	< LLD	< LLD	3.47E-05	< LLD
Sb-125	Ci	< LLD	< LLD	1.84E-03	9.24E-04
Cs-137	Ci	< LLD	< LLD	< LLD	1.80E-05
Total for Period	Ci	< LLD	< LLD	1.94E-03	1.61E-03
Xe-133	Ci	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD

<sup>1</sup>Ni-63 analysis on liquid effluents was not performed during 1st quarter of 2006.

#### <u>TABLE IV-B</u> (Continued) <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2006</u> LIQUID EFFLUENTS - CONTINUOUS MODE AND BATCH MODE RELEASES

		Continuous Mode		Batch	Mode
Nuclides Released	Unit	Quarter 3	Quarter 4	Quarter 3	Quarter 4
H-3	Ci	< LLD	< LLD	1.15E+02	1.69E+02
Co-58	Ci	< LLD	< LLD	< LLD	7.29E-06
Co-60	Ci	< LLD	< LLD	5.86E-04	2.43E-04
Ni-63	Ci	< LLD	< LLD	2.16E-05	6.83E-05
Sb-125	Ci	< LLD	< LLD	1.81E-04	3.58E-04
Cs-137	Ci	< LLD	< LLD	1.34E-05	< LLD
Total for Period	Ci	< LLD	< LLD	8.02E-04	6.77E-04
Xe-133	Ci	< LLD	< LLD	6.14E-06	2.77E-05
Total for Period	Ci	< LLD	< LLD	6.14E-06	2.77E-05

TABLE IV-C	
TYPICAL LOWER LIMITS OF DETECTION FOR LIQ	UID EFFLUENTS

Nuclide	LLD (µCi/ml)
H-3	5.04E-06
Cr-51	1.84E-07
Mn-54	2.79E-08
Fe-55	1.57E-07
Co-57	1.71E-08
Co-58	1.95E-08
Fe-59	1.51E-08
Co-60	2.94E-08
Ni-63	8.10E-08
Zn-65	4.28E-08
Sr-89	3.55E-08
Sr-90	1.53E-08
Nb-95	3.23E-08
Zr-95	3.30E-08
Mo-99	1.19E-07
Tc-99m	2.26E-08
Ag-110m	4.62E-08
Sn-113	3.18E-08
Sb-122	3.59E-08
Te-123m	1.95E-08
Sb-124	6.27E-08
Sb-125	8.99E-08
Xe-127	4.34E-07
I-131	2.12E-08
Xe-131m	7.15E-07
Te-132	2.24E-08
Xe-133	7.51E-08
Xe-133m	2.13E-07
Cs-134	2.13E-08
Xe-135	6.44E-08
Cs-137	2.75E-08
Ba-140	5.60E-08
La-140	3.21E-08
Ce-141	3.83E-08
Ce-144	1.33E-07
Gross Alpha	6.32E-08

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 24 of 38

# V. <u>SOLID WASTE AND IRRADIATED FUEL SHIPMENTS</u> Report Time Period: January 1, 2006, through December 31, 2006

# A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

Waste Class A

1. Type of Waste	Waste Volume (m <sup>3</sup> )	Activity (Ci)	Estimated Error (%)	No. Ship.	
------------------	-----------------------------------	------------------	------------------------	--------------	--

a.	Spent resins, filter sludges, evaporator bottoms, etc.	N/A	N/A	N/A	N/A
b.	Dry compressible waste, contaminated equipment, etc.	1.20E+02	5.99E-01	2.07E+01	3.00E+00
c.	Irradiated components, control rods, etc.	N/A	N/A	N/A	N/A
d.	Other: soil & oil	2.10E+01	3.96E-03	2.07E+01	2.00E+00

-

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 25 of 38

#### 2. Estimate of major nuclide composition (by type of waste)

	%	Ci	
a.	N/A	N/A	N/A
b.	Fe-55	3.34E+01	2.00E-01
	Co-60	2.18E+01	1.30E-01
	C-14	1.24E+01	7.43E-02
	Ni-63	1.16E+01	6.98E-02
	Co-58	8.39E+00	5.03E-02
	Н-3	6.70E+00	4.01E-02
	Sb-125	1.12E+00	6.74E-03
	Nb-95	1.05E+00	6.30E-03
	Zr-95	8.84E-01	5.30E-03
	Cs-137	7.77E-01	4.66E-03
	Cr-51	4.86E-01	2.91E-03
	Ag-110m	4.21E-01	2.52E-03
	Others*	1.01E+00	6.08E-03
c.	N/A	N/A	N/A
d.	H-3	3.43E+01	1.36E-03
	Fe-55	2.41E+01	9.56E-04
	Co-58	1.14E+01	4.51E-04
	Co-60	1.03E+01	4.08E-04
	Ni-63	5.50E+00	2.18E-04
	Nb-95	5.50E+00	2.18E-04
	Zr-95	3.66E+00	1.45E-04
<u> </u>	Cr-51	3.58E+00	1.42E-04
<u> </u>	C-14	9.16E-01	3.63E-05
<u> </u>	Cs-137	<u>3.96E-01</u>	1.57E-05
L	Ce-144	3.40E-01	1.35E-05
<b> </b>	I-129	2.07E-04	8.22E-09
L	Tc-99	9.27E-05	3.67E-09

\* Others include: Mn-54, Co-57, Fe-59, Tc-99, Sn-113, Te-123m, Sb-124, I-129, Ce-144, Pu-238, Pu-239, Am-241, Pu-241, Cm-242, & Cm-243

Total Curie Quantity and Principle Radionuclides were determined by estimate.

3. Solid Waste Deposition

Number of Shipments:
Mode of Transportation:
Destination:

4 Exclusive Use – Highway Duratek United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 26 of 38

#### V. <u>SOLID WASTE AND IRRADIATED FUEL SHIPMENTS</u> Report Time Period: January 1, 2006, through December 31, 2006

# B. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

Waste Class <u>B</u>

1. Type of Waste	Waste Volume (m <sup>3</sup> )	Activity (Ci)	Estimated Error (%)	No. Ship.	
------------------	-----------------------------------	------------------	------------------------	--------------	--

a.	Spent resins, filter sludges, evaporator bottoms, etc.	3.85E+00	1.72E+02	2.07E+01	1.00E+00
b.	Dry compressible waste, contaminated equipment, etc.	N/A	N/A	N/A	N/A
c.	Irradiated components, control rods, etc.	N/A	N/A	N/A	N/A
d.	Other: N/A	N/A	N/A	N/A	N/A

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 27 of 38

	%	Ci	
a.	Ni-63	6.41E+01	1.10E+02
	Fe-55	2.30E+01	3.95E+01
	Co-60	8.10E+00	1.39E+01
	Mn-54	1.24E+00	2.13E+00
	C-14	8.80E-01	1.51E+00
	Sb-125	8.33E-01	1.43E+00
	Co-58	7.11E-01	1.22E+00
	Ni-59	6.87E-01	1.18E+00
	Co-57	2.16E-01	3.70E-01
	H-3	7.57E-02	1.30E-01
	Ag-110m	5.88E-02	1.01E-01
	Ce-144	3.51E-02	6.02E-02
	Others*	6.29E-02	1.08E-01
b.	N/A	N/A	N/A
c.	N/A	N/A	N/A
d.	N/A	N/A	N/A

2. Estimate of major nuclide composition (by type of waste)

\* Others include: Sr-89, Sr-90, Nb-95, Tc-99, Sn-113, I-129, Cs-137, Pu-238, Pu-239, Am-241, Pu-241, Cm-242, & Cm-243

Total Curie Quantity and Principle Radionuclides were determined by estimate

3. Solid Waste Deposition

Number of Shipments: Mode of Transportation: Destination:

l Exclusive Use – Highway Barnwell United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 28 of 38

#### V. <u>SOLID WASTE AND IRRADIATED FUEL SHIPMENTS</u> Report Time Period: January 1, 2006, through December 31, 2006

# C. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

Waste Class C

2. Type of Waste	Waste	Activity	Estimated	No.
	Volume (m <sup>3</sup> )	(Ci)	Error (%)	Ship.

a.	Spent resins, filter sludges, evaporator bottoms, etc.	N/A	N/A	N/A	N/A
b.	Dry compressible waste, contaminated equipment, etc.	N/A	N/A	N/A	N/A
c.	Irradiated components, control rods, etc.	N/A	N/A	N/A	N/A
d.	Other: N/A	N/A	N/A	N/A	N/A

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 29 of 38

# 2. Estimate of major nuclide composition (by type of waste)

		% Ci	
a.	N/A	N/A	N/A
b.	N/A	N/A	N/A
с.	N/A	N/A	N/A
d.	N/A	N/A	N/A

3. Solid Waste Deposition

Number of Shipments:	N/A
Mode of Transportation:	N/A
Destination:	N/A

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 30 of 38

#### VI. 40 CFR 190 DOSE CONFORMANCE

The direct radiation assessment to the most likely exposed member of the public is reported in the Annual Radiological Environmental Operating Report. The results of the assessment demonstrate no measurable affect above background from plant operations. Since no 10 CFR 50, Appendix I, limits have been exceeded and the evaluation of the Independent Spent Fuel Storage Installations indicate only a small fraction of the total dose to the environs, this demonstrates conformance with 40 CFR 190, "Environmental Radiation Protection Standards for Nuclear Power Operation."

#### VII. METEOROLOGICAL DATA

#### A. <u>Continuous Release Diffusion Analysis</u>

Table VII-A presents the number and frequency of wind direction occurrences by wind speed class as recorded at the onsite meteorological system during continuous releases, for the period January 1, 2006, through December 31, 2006.

The frequencies are presented as a percent of total occurrences for each stability class, as well as a summary for all classes for the lower (11 meter) sensor elevation.

Pertinent information available from the tables is as follows:

1. <u>Stability</u>

Percent occurrence Pasquill Stability categories based on lower level (11 meter) wind distribution:

A	В	С	D	E	F	G
7.33	6.14	7.06	34.64	22.81	10.17	11.85

2.	Wind Speed	<u>11 Meter</u>
	Average Speed (mph) Percent Calm	4.06 10.16
3.	Percent Less than 3.5 mph Wind Direction	51.84 <u>11 Meter</u>
	Prevailing Percent Occurrence	S 12.33

# United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 31 of 38

#### TABLE VII-A JOINT OCCURRENCE FREQUENCIES FOR LOWNDDEG AND LOWNDSPD - CONTINUOUS RELEASES

Atmospheric Stability Class A																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1.56	0.01	0.00	0.02	0.07	0.06	0.09	0.02	0.02	0.00	0.03	0.06	0.13	0.04	0.01	0.00	0.00	0.57
3.35	0.20	0.09	0.18	0.09	0.06	0.03	0.08	0.21	0.25	1.01	1.19	0.85	0.70	0.22	0.06	0.03	5.25
5.59	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.18	0.24	0.24	0.04	0.03	0.11	0.22	0.10	1.43
8.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.01	0.04	0.01	0.08
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.46	0.09	0.20	0.16	0.11	0.12	0.10	0.26	0.43	1.29	1.48	1.03	0.77	0.36	0.33	0.15	7.33

Atmospheric Stability Class B																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1.56	0.00	0.03	0.10	0.21	0.13	0.11	0.17	0.04	0.02	0.03	0.18	0.10	0.16	0.02	0.00	0.02	1.34
3.35	0.44	0.24	0.22	0.15	0.06	0.01	0.11	0.28	0.20	0.63	0.39	0.21	0.21	0.18	0.10	0.16	3.59
5.59	0.20	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.12	0.18	0.07	0.00	0.01	0.09	0.24	0.24	1.15
8.27	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.06
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.65	0.27	0.33	0.36	0.19	0.12	0.28	0.34	0.36	0.84	0.64	0.31	0.38	0.29	0.37	0.41	6.14

Atmospheric Stability Class C																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1.56	0.07	0.08	0.18	0.35	0.21	0.33	0.30	0.11	0.06	0.13	0.22	0.24	0.16	0.11	0.03	0.04	2.62
3.35	0.61	0.29	0.20	0.10	0.00	0.00	0.03	0.26	0.34	0.47	0.37	0.22	0.17	0.12	0.27	0.17	3.62
5.59	0.09	0.02	0.00	0.00	0.00	0.00	0.00	0.02	0.06	0.10	0.02	0.02	0.01	0.04	0.15	0.26	0.79
8.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.02
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.76	0.39	0.38	0.45	0.21	0.33	0.34	0.39	0.45	0.71	0.62	0.48	0.34	0.28	0.46	0.48	7.06

Atmospheric Stability Class D																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.01	0.03	0.03	0.03	0.02	0.02	0.02	0.02	0.01	0.02	0.02	0.01	0.01	0.01	0.00	0.00	0.27
1.56	0.47	1.35	1.67	1.45	0.89	0.84	0.84	1.05	0.65	0.75	0.89	0.65	0.56	0.33	0.22	0.22	12.83
3.35	3.04	2.29	0.65	0.35	0.12	0.04	0.12	2.11	2.21	1.40	0.84	0.55	0.39	0.48	0.62	0.98	16.19
5.59	1.14	0.12	0.00	0.00	0.00	0.00	0.00	0.27	0.93	0.35	0.08	0.09	0.01	0.03	0.43	1.12	4.58
8.27	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31	0.02	0.00	0.00	0.00	0.00	0.03	0.27	0.77
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4.80	3.79	2.36	1.82	1.03	0.90	0.98	3.45	4.12	2.54	1.82	1.30	0.98	0.85	1.30	2.59	34.64

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 32 of 38

Atmospheric Stability Class E																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.07	0.07	0.05	0.04	0.01	0.01	0.01	0.12	0.23	0.24	0.14	0.10	0.08	0.06	0.06	0.05	1.34
1.56	0.64	0.72	0.44	0.39	0.11	0.11	0.11	1.14	2.22	2.29	1.33	0.95	0.76	0.59	0.61	0.52	12.94
3.35	0.45	0.03	0.03	0.03	0.01	0.01	0.04	0.58	1.73	1.18	0.62	0.15	0.19	0.34	0.70	1.56	7.65
5.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.24	0.04	0.02	0.00	0.00	0.01	0.10	0.36	0.79
8.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.08
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.15	0.83	0.52	0.47	0.13	0.13	0.17	1.88	4.45	3.75	2.11	1.20	1.03	1.00	1.46	2.52	22.81

Atmospheric Stability Class F																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.11	0.05	0.04	0.01	0.00	0.00	0.04	0.30	0.32	0.31	0.26	0.16	0.12	0.16	0.34	0.25	2.47
1.56	0.27	0.12	0.10	0.03	0.00	0.01	0.09	0.75	0.80	0.76	0.65	0.40	0.30	0.39	0.86	0.63	6.18
3.35	0.03	0.00	0.00	0.00	0.00	0.00	0.01	0.03	0.12	0.02	0.02	0.00	0.02	0.06	0.53	0.67	1.52
5.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.41	0.17	0.14	0.05	0.00	0.01	0.14	1.09	1.24	1.09	0.93	0.57	0.45	0.61	1.73	1.55	10.17

Atmospheric Stability Class G																	
Max (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
0.34	0.22	0.08	0.04	0.00	0.01	0.03	0.12	0.43	0.70	0.38	0.21	0.32	0.09	0.38	1.71	1.37	6.09
1.56	0.19	0.07	0.03	0.00	0.01	0.02	0.10	0.37	0.59	0.33	0.18	0.27	0.08	0.33	1.46	1.17	5.19
3.35	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.06	0.44	0.57
5.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.48	0.15	0.07	0.00	0.02	0.05	0.22	0.80	1.29	0.71	0.39	0.58	0.17	0.72	3.22	2.97	11.85
Frequency	8.71	5.68	3.99	3.30	1.70	1.67	2.22	8.21	12.33	10.92	7.99	5.48	4.12	4.10	8.88	10.68	100.00

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 33 of 38

1

#### ADDENDUM 1

## CHANGES TO ODCM, PCP, AND RADIOACTIVE WASTE SYSTEMS

# TABLE OF CONTENTS

Descri	iption	<u>Page</u>
I.	Changes to the Offsite Dose Calculation Manual (ODCM)	
II.	Changes to the Radioactive Waste Systems	
III.	Changes to the Process Control Program (PCP)	
IV.	Changes to the Land Use Census	
V.	Instrument Inoperability	
VI.	Liquid Holdup Tank Curie Limit	
VII.	Waste Gas Decay Tank Curie Limit	
VIII.	Missed Compensatory Samples	
IX.	Special Ground Water Protection Requirements	

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 34 of 38

#### I. CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

There was one revision to the ODCM during this reporting period. A summary of the revision is shown below. A complete copy of the updated ODCM is being submitted in a separate letter.

#### ODCM, Revision 28 Description of Changes

- 1) Deleted discussion of Unreviewed Safety Question Determinations and detailed requirements for ODCM changes found in Section 1.0. This is historical terminology. Requirements for reviews of changes to the ODCM are stated in Robinson Plant Technical Specification 5.5.1.c and do not need to be additionally listed in the ODCM.
- 2) Added waste flows to Section 2.1.2.2. This is an editorial change, as these waste flows were already present in Section 2.1.2.3 but were also added to the aforementioned section since this section utilizes the rated flows prior to their presentation in the latter section.
- Revised Equation 2.5-2 present in Section 2.5.1 to reflect the inclusion of the shore line sediment pathway in the A<sub>iτ</sub> equation for liquid effluents. Additionally revised definition of A<sub>iτ</sub> in Section 2.5.1 to reflect this change. There are no changes in the actual A<sub>iτ</sub> factors, as these factors were already derived based on the inclusion of the shore line sediment pathway.
- Revised Table 2.5-1 (A<sub>iτ</sub> Values for the Adult for the H.B. Robinson Steam Electric Plant) to add Ni-63. These values were calculated using the methodology established in the ODCM.
- 5) Revised Table 2.8-1 (Radioactive Liquid Waste Sampling and Analysis Program)
  - a) Changed the frequency for sampling continuous releases for composite purposes from "D" (1/24 hours) to 3 times per week. Additionally revised Note "g" to reflect compensatory sampling of 3/week if the compositer is out of service. This frequency meets the intent of NUREG 1301 by ensuring that representative sampling of the volume discharged through a week is obtained.
  - b) Changed the frequency for performing I-131 analysis on continuous releases from 1/M to 3/W. This is an increase in the sampling frequency that is consistent with NUREG 1301.
  - c) Revised this same table to add Note "h" to state that tritium analyses on batch tank releases may be performed on an individual basis instead of performing an analyses on a composite sample. This change enhances dose compliance requirements as analyses are performed on individual releases vice a composite basis.
  - d) Additionally revised this table to add Note "i" to state that for continuous releases, samples may be analyzed as individual samples vice a composite sample if desired. This change enhances dose compliance requirements as shorter lived nuclides could be more accurately quantified.
  - e) Added sampling frequency notation to describe the sampling frequency associated with the abbreviations listed in the table. With the exception of the addition of the 3 times per week sampling frequency to describe this new frequency, the descriptions are unchanged as previously described in Section 8.2.5.
- 6) Revised Section 3.1.2.1 to add descriptive statements to the containment purge and pressure relief equations to state when these equations should be utilized. Additionally, added descriptive statements to the flow values to state when these flows should be utilized. These are editorial changes only, as the rated flows and equations did not change.
- 7) Revised Note 2 for Table 3.1-1 (Gaseous Source Terms) to remove references to R-14 A&B. The Plant Vent stack monitor was replaced under EC 52464 and the R-14 A&B channels were removed. This is an editorial change only, as these channels were previously removed from the ODCM in Revision 27.

- 8) Revised Table 3.10-1 (Radioactive Gaseous Effluent Monitoring Instrumentation), Section 1.e (Plant Vent Sample Flow Rate Monitor) to change the minimum channels operable from "1 of the 2 monitors" to "1." This is a conservative change, as this change removes the allowance for the flow gauge to meet the Minimum Channels Operable (MCO), as this gauge has no alarm functions.
- 9) Revised Table 3.10-1 (Radioactive Gaseous Effluent Monitoring Instrumentation) to add Sections 3.c & d (Fuel Handling Building Lower Level Exhaust Vent radioiodine and particulate samplers) to list these as required channels. This addition is consistent with the guidance found in NUREG 1301 and is similar to the requirements in the ODCM for other release pathways with radioiodine and particulate samplers.
- 10) Deleted Section 7 (Outage Contaminated Storage Building Exhaust) from Tables 3.10-1 (Radioactive Gaseous Effluent Monitoring Instrumentation) and 3.11-1 (Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements). These sections detailed the MCO and surveillance requirements for the channels that are used for monitoring the effluent from the exhaust fan of the Outage Contaminated Storage Building. These channels are not considered appropriate for inclusion in the ODCM as this pathway is not considered to be a routinely operated release point whose operation contributes to the amount of gaseous particulate and iodine released by the site. During the previous several years, there have been no known instances where this pathway has been utilized or radioactivity has been measured. The only time there is a potential for airborne radioactive material is if containers in the building are opened and equipment with loose contamination is physically handled in the area. In this case, monitoring is controlled by procedure HPP-105, "Airborne Radioactivity Surveillance," which directs the establishment of sampling to ensure that effluent accountability is maintained.
- Revised Tables 3.11-1 (Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements) & 3.12-1 (Radioactive Gaseous Waste Sampling And Analysis Program) to add notation to describe the surveillance and sampling frequency requirements. These are editorial changes only as these descriptions were previously listed in Section 8.2.5.
- 12) Revised Table 4.1-2 (Reporting Levels for Radioactivity Concentrations in Environmental Samples) to change the reporting level from I-131 in water from 2 pCi/l to 20 pCi/l. The new value will align the reporting requirements with current ODCM methodology which does not include a drinking water pathway. The new value is consistent with NUREG 1301.
- 13) Revised Table 4.1-3 (Lower Limits Of Detection) to delete the LLD value for gross beta analysis in water. This is an editorial change as there are no analyses specified in the ODCM that require the performance of gross beta in water and hence no need for a required LLD.
- 14) Revised Figure 4-2 (Radiological Sample Distant Locations) to reflect the fact that sample location #2 is not shown on the map. This is an editorial change only as there is no actual change to any sampling locations or frequencies.
- 15) Revised Section 8.2.5 to add the new sampling frequency of 3 times per week as described above.
- 16) Added new Section 8.3 which details compensatory sampling time requirements. This section is consistent with the compensatory requirements found in Technical Requirements Manual TR 3.0.2.
- 17) Revised Section 9.1.4 which details the requirements for solid waste in the Radioactive Effluent Release Report to delete the requirements to list the type of container and solidification agent. Additionally the requirement to list the container volume was changed to waste volume and a new requirement to list the number of shipments, the mode of transport, and the destination was added. These changes are consistent with Regulatory Guide 1.21.
- 18) Added new steps 9.1.9, 9.1.10, & 9.1.11 to the Annual Radioactive Effluent Release Report requirements to incorporate the Voluntary Special Ground Water Protection Initiative.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 36 of 38

- 19) Added Section 9.4 (Special Ground Water Protection Reports), to incorporate the special reports generated as a result of the Voluntary Special Ground Water Protection Initiative.
- 20) Revised discussion regarding fractional feed for cow/goat in Section B.2.3 to reflect that a fp factor of 1.0 will be utilized. This is a conservative value in place of site specific information which results in slightly higher Ri values for the cow/goat milk and meat pathways and is consistent with NUREG 0133 and Regulatory Guide 1.109. There are no changes in the actual Ri factors as these factors were already derived based on an fp factor of 1.0.

#### II. CHANGES TO THE RADIOACTIVE WASTE SYSTEMS

There were no changes to the Radioactive Waste Systems during this reporting period.

#### III. CHANGES TO THE PROCESS CONTROL PROGRAM (PCP)

There were no changes to the Process Control Program during this reporting period.

#### IV. CHANGES TO THE LAND USE CENSUS

The Land Use Census is performed every 24 months and was performed in 2006. The results of the 2006 Land Use Census and average meteorological data for the last 10 years identified no changes that required an ODCM change. The next Land Use Census will be performed in 2008.

#### V. INSTRUMENT INOPERABILITY

There were no reportable instrumentation inoperability events during this reporting period.

#### VI. LIQUID HOLDUP TANK CURIE LIMIT

There were no outside liquid holdup tanks that exceeded the ten curie limit during this reporting period.

#### VII. WASTE GAS DECAY TANK CURIE LIMIT

There were no waste gas decay tanks with a curie content that exceeded the 1.90E+04 curie limit during this reporting period.

#### VIII. MISSED COMPENSATORY SAMPLES

There were no instances of missed compensatory samples during 2006.

#### IX. SPECIAL GROUND WATER PROTECTION REQUIREMENTS

There were no dose calculations performed or special reports made as a result of any spills or leaks during this period.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 37 of 38

#### ADDENDUM 2

#### CORRECTIONS TO PREVIOUS REPORTS

# TABLE OF CONTENTS

	Description	<u>Page</u>
I.	DISCUSSION	38

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/07-0025 Page 38 of 38

# I. <u>DISCUSSION</u>

There are no corrections to previous reports.