



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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April 29, 2009

10 CFR 50.36a

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

Subject: 2008 Annual Radioactive Effluent Release and Waste Disposal Report

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Big Rock Point
Dockets 50-155 and 72-043
License No. DPR-6

Dear Sir or Madam:

Enclosed is the Entergy Nuclear Operations, Inc. 2008 Annual Radioactive Effluent Release and Waste Disposal Report for Palisades Nuclear Plant (PNP) and Big Rock Point Plant (BRP). This report is submitted in accordance with 10 CFR 50.36a(a)(2).

Enclosure 1 contains the report for PNP. Enclosure 2 contains the report for BRP.

These reports provide a summary of the quantities of radioactive liquid and gaseous effluent releases and solid radioactive waste processed during the period of January 1, 2008, through December 31, 2008.

This letter contains no new commitments and no revision to existing commitments.

Sincerely,

Terry A. Davis
Licensing Manager
Palisades Nuclear Plant

tad/bed

Enclosures (2)

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC
NRC NMSS Project Manager

*designated as original
as per mahesh Chawla
4/20/2010*

ENCLOSURE 1
PALISADES RADIOACTIVE EFFLUENT RELEASE REPORT
LIQUID EFFLUENTS – SUMMATION OF RELEASES
JANUARY – DECEMBER 2008

2008 Plant Operating History

Palisades Nuclear Plant (PNP) was on line on January 1, 2008. PNP was taken off line on January 13, 2008, due to a main feedwater pump trip. The plant was returned to service on January 14, 2008. PNP was taken off line on May 23, 2008, due to an apparent loss of load and was returned to service on May 25, 2008. PNP was taken off line on August 5, 2008, due to excessive control rod drive mechanism leakage and returned to service on August 10, 2008. PNP remained on line for the remainder of 2008.

1. Supplemental Information

a. Batch Releases

Information relating to batch release of gaseous and liquid effluents is provided in Attachment 1, "Batch Releases."

b. Abnormal Releases

In 2007, tritium was detected in a groundwater monitoring well at a level of 34,500 pCi/L. Monitoring performed during 2008, showed tritium levels range from 639 pCi/L to 42,900 pCi/L. No radionuclides other than tritium have been detected. Repairs have been completed on buried piping and a storage tank, however, troubleshooting and additional repairs are necessary. Tritium is still being released to the environment via an unmonitored pathway as evidenced by the continued detection of monitoring well sample activity. A definitive release rate or total activity released cannot be determined. Conservatively, the same 1% estimate of total tritium activity released via batch releases that was used in 2007 will be used for 2008 effluent calculations. The result is 6.18 curies.

2. Gaseous Effluents

Attachment 2, "Gaseous Effluents – Summation of Releases," lists and summarizes all gaseous radioactive effluents released during the reporting period.

3. Liquid Effluents

Attachment 3, "Liquid Effluents – Summation of Releases," lists and summarizes all liquid radioactive effluents released during the reporting period.

4. Radiological Impact on Man

Doses to individuals and populations were calculated using LADTAP and GASPAR computer programs.

- a. Total body and organ doses to an individual in unrestricted areas from receiving water-related exposure pathways were $1.98E-3$ mrem and $2.29E-3$ mrem respectively. (Teen whole body and teen gastrointestinal-lower large intestine - organ)
- b. The maximum offsite air doses due to beta and gamma radiations at locations near ground level from gaseous effluents occurred at the site boundary (0.48 miles south-south east (SSE)). The air doses were $1.04E-3$ millirad beta and $3.71E-4$ millirem gamma.
- c. Organ doses to individuals in unrestricted areas from radioactive iodine and radioactive material in gaseous particulate form from the major pathways of exposure were $5.44E-3$ millirem. (Child thyroid)
- d. Total body dose to the population and average dose to individuals in the population from receiving water-related pathways to a distance of 50 miles from the site were $4.22E-3$ rem and $3.19E-6$ millirem, respectively.
- e. Total body doses to the population and average doses to individuals from gaseous effluents to a distance of 50 miles from the site were $3.25E-2$ rem and $2.46E-5$ millirem respectively.

5. ODCM Changes

The ODCM with changes annotated is included as Attachment 7. Locations for dose calculations based on the latest Land Use Census are as follows:

Location	Direction	Miles from Plant
Site Boundary	SSE	0.48
Residence	SSW	0.49
Garden	SE	1.49
Beef Cattle	SE	4.3

Attachment 7 contains the ODCM, Revision 20, per the requirements of Technical Specification 5.5.1.c.3.

6. Additional Information

a. Estimate of Uncertainty

Both the Gaseous and Liquid Summation of Release data sheets include estimates of the uncertainty associated with the measurement of radioactive effluents. These estimates are based on statistical analyses of a series of sample results as described in the ODCM, Appendix A. These results are listed in the "Est Error %" columns on the Gaseous and Liquid Summation Reports.

b. Solid Waste

Attachment 4, "Solid Waste," summarizes all solid radioactive waste shipped for burial in 2008, including the waste classification, sources, volume shipped, activity (curies), and principal nuclide content. Radwaste shipments were made either to Barnwell Waste Management Facility, or to Envirocare of Utah, Inc.

c. Process Control Program

No changes were made to the process control program.

d. Lower Limits of Detection

The lower limits of detection (LLDs) required by the Offsite Dose Calculation Manual (ODCM) for gaseous and liquid effluents are provided in Attachment 5, "Lower Limits of Detection for Palisades Effluents."

e. Cross Check Program

Results of the 2008 Radiochemistry Cross Check Program with Analytics are shown in Attachment 6. Results were in agreement for all isotopes on all three detectors.

f. Radioactive Effluent Monitoring Instrumentation

RIA-1113, waste gas discharge monitor, was out of service at the beginning of 2008, placed back in service on January 17, 2008, taken out again on January 23, 2008, and returned to service on January 31, 2008. All other effluent monitors required to be in service per the ODCM were in service for the duration of 2008.

**ATTACHMENT 1
PALISADES NUCLEAR PLANT
RADIOACTIVE EFFLUENT RELEASE REPORT
BATCH RELEASES
JANUARY – DECEMBER 2008**

TABLE HP 10.5-1

GASEOUS	Units	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
Number of Releases	N/A	4	2	7	5
Total Release Time	Minutes	441	137	653	579
Maximum Release Time	Minutes	139	75	125	163
Average Release Time	Minutes	110	68.5	93.3	115.8
Minimum Release Time	Minutes	67	62	63	69

LIQUID	Units	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
Number of Releases	N/A	8	13	18	8
Total Release Time	Minutes	2608	2086	1807	2035
Maximum Release Time	Minutes	1391	206	263	565
Average Release Time	Minutes	326.0	160.5	100.4	254.4
Minimum Release Time	Minutes	150	78	64	36

**ATTACHMENT 2
RADIOACTIVE EFFLUENT RELEASE REPORT
GASEOUS EFFLUENTS – SUMMATION OF RELEASES**

A.	Fission and Activation Gases	Units	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year	Est Error %
1.	Quarterly sum of total curies	Ci	3.74E-01	8.29E-01	9.91E+00	9.86E-01	1.21E+01	4.0
2.	Average release rate	μCi/sec	4.75E-02	1.05E-01	1.25E+00	1.24E-01		
3.	Percent of limit	%	2.33E-05	4.78E-05	6.17E-04	5.64E-05		
4.	Ar-41	Ci	< LLD	< LLD	< LLD	< LLD		
	Kr-85	Ci	4.16E-02	4.29E-03	6.95E-03	< LLD		
	Kr-85m	Ci	< LLD	< LLD	7.08E-03	< LLD		
	Kr-87	Ci	1.19E-03	< LLD	< LLD	< LLD		
	Kr-88	Ci	< LLD	< LLD	< LLD	< LLD		
	Xe-131m	Ci	5.40E-04	1.52E-04	6.27E-03	1.10E-03		
	Xe-133	Ci	3.26E-01	8.19E-01	9.57E+00	9.78E-01		
	Xe-133m	Ci	< LLD	< LLD	6.26E-02	< LLD		
	Xe-135	Ci	1.99E-03	2.15E-03	2.51E-01	2.27E-03		
	Xe-135m	Ci	2.52E-03	3.61E-03	5.73E-03	4.66E-03		
	Xe-138	Ci	< LLD	< LLD	< LLD	< LLD		
B.	Iodines							
1.	Total Iodine	Ci	2.15E-04	3.04E-04	4.87E-04	3.96E-04	1.40E-03	7.5
2.	Average release rate	μCi/sec	2.73E-05	3.86E-05	6.13E-05	4.98E-05		
3.	% of limit for Iodine 131/133	%	1.24E-05	1.70E-05	2.90E-05	1.85E-05		
4.	I-131	Ci	6.08E-05	8.15E-05	1.49E-04	7.38E-05		
	I-133	Ci	1.54E-04	2.22E-04	3.38E-04	3.22E-04		
	I-135	Ci	< LLD	< LLD	< LLD	< LLD		
C.	Particulates half-life > 8 days							
1.	Total Release	Ci	9.86E-06	8.74E-06	7.66E-06	1.13E-05	3.76E-05	31.0
2.	Average release rate for period	μCi/sec	1.25E-06	1.11E-06	9.64E-07	1.42E-06		
3.	% of limit	%	4.15E-05	3.94E-05	3.42E-05	5.04E-05		
4.	Mn-54	Ci	< LLD	< LLD	< LLD	< LLD		
	Co-58	Ci	6.72E-07	< LLD	< LLD	< LLD		
	Fe-59	Ci	<LLD	<LLD	<LLD	<LLD		
	Co-60	Ci	< LLD	< LLD	< LLD	< LLD		
	Zn-65	Ci	< LLD	< LLD	< LLD	< LLD		
	Y-88	Ci	< LLD	< LLD	< LLD	< LLD		
	Nb-95	Ci	< LLD	< LLD	< LLD	< LLD		
	Sr-89	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00		
	Sr-90	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00		
	Cs-134	Ci	< LLD	< LLD	< LLD	< LLD		
	Cs-137	Ci	< LLD	< LLD	< LLD	< LLD		
	Ce-141	Ci	< LLD	< LLD	< LLD	< LLD		
	Ce-144	Ci	<LLD	<LLD	<LLD	<LLD		
		Total For Period	Ci	6.72E-07	0.00E+00	0.00E+00	0.00E+00	
5.	Gross alpha radioactivity	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00		

**ATTACHMENT 2
RADIOACTIVE EFFLUENT RELEASE REPORT
GASEOUS EFFLUENTS – SUMMATION OF RELEASES**

D. Tritium	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year
1. Total Release	Ci	1.19E+01	1.01E+01	7.71E+00	8.32E+00
2. Average release rate for period	μCi/sec	1.51E+00	1.28E+00	9.70E-01	1.05E+00
3. Percent of limit	%	3.22E-03	2.73E-03	2.06E-03	2.23E-03

E. Whole Body Dose					
1. Beta Airdose at site boundary due to noble gases (ODCM App A III.C)	mrad	3.50E-05	6.95E-05	8.56E-04	8.22E-05
2. Percent limit	%	3.50E-04	6.95E-04	8.56E-03	8.22E-04
3. Gamma Airdose at Site boundary due to noble gasses (ODCM App A III.C)	mrad	1.03E-05	2.37E-05	3.09E-04	2.83E-05
4. Percent Limit	%	2.06E-04	4.74E-04	6.18E-03	5.66E-04

F. Organ Dose					
1. Maximum organ dose to public based on critical receptors (ODCM App A III.D)	mrem	1.09E-03	1.26E-03	1.97E-03	1.12E-03
2. Percent of Limit	%	1.45E-02	1.68E-02	2.62E-02	1.50E-02

Tritium	Ci	1.19E+01	1.01E+01	7.71E+00	8.32E+00
Total	Ci	2.53E+01	2.15E+01	1.64E+01	1.77E+01

Net Unidentified beta	Ci	9.19E-06	8.74E-06	7.66E-06	1.13E-05
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Un ID Beta % of Release		3.05E-04
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Note: All gaseous releases from PNP are considered to be ground-level releases.

**ATTACHMENT 3
RADIOACTIVE EFFLUENT RELEASE REPORT
LIQUID EFFLUENTS – SUMMATION OF RELEASES**

A.	Mixed Fission and Activation Products	Units	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year	Est Total Error %
1.	Total Release (not including tritium, gasses or alpha)	Ci	1.67E-03	9.20E-04	6.80E-03	8.19E-03	1.76E-02	20.2
2.	Average concentration for quarter	µCi/ml	4.24E-11	3.20E-11	1.74E-10	2.11E-10		
3.	Percent of limit	%	8.00E-04	4.43E-04	1.59E-03	2.19E-03		
4.	Cr-51	Ci	< LLD	3.63E-04	< LLD	< LLD		
	Mn-54	Ci	1.13E-04	3.91E-05	1.89E-04	8.40E-04		
	Co-57	Ci	< LLD	< LLD	< LLD	< LLD		
	Co-58	Ci	7.65E-04	1.79E-04	5.43E-03	5.58E-03		
	Fe-59	Ci	< LLD	1.45E-05	9.64E-05	1.91E-04		
	Co-60	Ci	7.00E-04	2.60E-04	9.41E-04	1.41E-03		
	Zn-65	Ci	< LLD	< LLD	< LLD	< LLD		
	Sr-89	Ci	7.96E-06	0.00E+00	8.15E-05	6.85E-05		
	Sr-90	Ci	7.47E-06	0.00E+00	5.15E-06	1.41E-05		
	Nb-95	Ci	< LLD	7.74E-06	4.34E-05	< LLD		
	Zr-95	Ci	5.12E-06	< LLD	3.48E-05	< LLD		
	Ag-110m	Ci	6.11E-05	3.36E-05	<LLD	8.94E-05		
	Sb-125	Ci	< LLD	< LLD	< LLD	< LLD		
	I-131	Ci	< LLD	6.39E-06	< LLD	< LLD		
	Cs-134	Ci	< LLD	< LLD	< LLD	< LLD		
	Cs-137	Ci	1.38E-05	1.62E-05	< LLD	4.62E-07		
Ce-141	Ci	< LLD	< LLD	< LLD	< LLD			
Ce-144	Ci	< LLD	< LLD	< LLD	< LLD			

B.	Tritium	Units	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year	Est Total Error %
1.	Total release	Ci	5.39E+01	1.43E+02	2.87E+02	2.54E+02	7.38E+02	4.0
2.	Average concentration for quarter	µCi/ml	1.37E-06	4.97E-06	7.35E-06	6.55E-06		
3.	Percent of limit	%	1.37E-01	4.97E-01	7.35E-01	6.55E-01		

C.	Dissolved and Entrained Gasses	Units	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year	Est Total Error %
1.	Total release	Ci	0.00E+00	0.00E+00	1.87E-04	0.00E+00	1.87E-04	28.0
2.	Average diluted concentration during period	µCi/ml	0.00E+00	0.00E+00	4.79E-12	0.00E+00		
3.	Percent of limit	%	0.00E+00	0.00E+00	2.40E-06	0.00E+00		
4.	Xe-133	Ci	< LLD	< LLD	1.87E-04	< LLD		
	Xe-135	Ci	< LLD	< LLD	< LLD	< LLD		

D.	Gross Alpha Radioactivity	Units	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year	Est Total Error %
1.	Total Release	Ci	< LLD	< LLD	< LLD	1.20E-05	1.20E-05	

**ATTACHMENT 3
RADIOACTIVE EFFLUENT RELEASE REPORT
LIQUID EFFLUENTS – SUMMATION OF RELEASES**

E.	Volumes	Units	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Year
1.	Volume of liquid effluent released prior to dilution	liters	3.73E+05	3.72E+05	5.03E+05	6.63E+05	1.91E+06
2.	Volume of dilution water used during period	liters	3.95E+10	2.88E+10	3.90E+10	3.88E+10	1.46E+11

Radiological Impact on Man

F.	Total Body Dose					
1.	F. Maximum Dose Commitment - Whole Body	mrem	3.28E-04	2.75E-04	5.88E-04	7.86E-04
2.	Percent of ODCM App A III.H limit	%	2.19E-02	1.83E-02	3.92E-02	5.24E-02

G.	Organ Dose					
1.	G. Maximum Dose Commitment - Organ	mrem	3.46E-04	3.08E-04	7.98E-04	8.52E-04
2.	Percent of ODCM App A III.H limit	%	6.92E-03	6.16E-03	1.60E-02	1.70E-02

* Particulates with half-lives > 8 days

**ATTACHMENT 4
PALISADES NUCLEAR PLANT
RADIOACTIVE EFFLUENT RELEASE REPORT
SOLID WASTE
JANUARY – DECEMBER 2008**

Waste Class	Source of Waste	Container Type	Volume (m ³)	*Total Curies	** Principal Radionuclides
AS	Resin Charcoal	High Integrity Container	3.6	12	H-3, Mn-54, Fe-55, Co-57, Co-58, Co-60, Ni-59, Ni-63, Zn-65, Sr-90, Nb-95, Nb-97, Ag-110m, Sb-125, Cs-137, La-140, Ce-144, Pu-238, Pu-239, Pu-241, Am-242, Cm-242, Cm-243
AU	Dry Active Waste	General Design	152.35	1.102	H-3, Cr-51, Mn-54, Fe-59, Co-58, Co-60, Ni-59, Ni-63, Sr-90, Nb-95, Zr-95, Tc-99, Ag-110m, Sb-125, Cs-137, Ce-144, Pu-238, Pu-239, Pu-241, Am-242, Cm-242, Cm-243
C	Resin	High Integrity Container	4.81	308	H-3, C-14, Cr-51, Mn-54, Fe-55, Fe-59, Co-58, Co-60, Ni-59, Ni-63, Sr-90, Tc-99, Ru-106, Ag-110m, Sb-125, I-129, Cs-137, Eu-154, Eu-155, U-233, U-238, Pu-238, Pu-239, Pu-241, Am-241, Cm-242, Cm-243
		Total	160.76	321.102	

*All shipments went to waste processors and not direct to disposal. The volume presented indicates shipment volume.

**Gamma isotopes are measured quantities, all other isotopes are estimated.

**ATTACHMENT 5
 PALISADES NUCLEAR PLANT
 RADIOACTIVE EFFLUENT RELEASE REPORT
 LOWER LIMITS OF DETECTION FOR PALISADES EFFLUENTS
 JANUARY – DECEMBER 2008**

Gaseous Release Type	Type of Activity Analysis	Lower Limit of Detection (μCi/ml)
Waste Gas Storage Tank	Principal Gamma Emitters	1E-04
Containment Purge	Principal Gamma Emitters	1E-04
Stack Gas Effluent	I-131, I-133	1E-12
	Principal Gamma Emitters (I-131, Others)	1E-11
	Sr-89, Sr-90, and Gross Alpha	1E-11
	Noble Gases Gross Beta or Gamma	1E-06

Liquid Release Type	Type of Activity Analysis	Lower Limit of Detection (μCi/ml)
Batch Waste Release Tanks	Principal Gamma Emitters	5E-07
	I-131	1E-06
	Dissolved and Entrained Gases (Gamma Emitters)	1E-05
	H-3	1E-05
	Gross Alpha	1E-07
Continuous Releases	Sr-89, Sr-90	5E-08
	Principal Gamma Emitters	5E-07
	I-131	1E-06
	Dissolved and Entrained Gases (Gamma Emitters)	1E-05
	H-3	1E-05
	Gross Alpha	1E-07
	Sr-89, Sr-90	5E-08

ATTACHMENT 6

PALISADES NUCLEAR PLANT

**RADIOACTIVE EFFLUENT RELEASE REPORT
RESULTS OF 2008 RADIOCHEMISTRY CROSS CHECK PROGRAM**

**NOTE: CROSS CHECKS ARE NOT TYPICALLY PERFORMED IN THE FIRST
QUARTER OF THE YEAR**



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RESULTS OF RADIOCHEMISTRY


CROSS CHECK PROGRAM

ENTERGY

PALISADES NUCLEAR PLANT

2nd QUARTER 2008

(Ref. Date 05/16/08)

 7-10-08

Daniel M. Montgomery, QA Manager

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi	VALUE microCi	PALISADES: ANALYTICS		

A22633-66	Ce-141	7.10E-05	7.49E-05	0.95	20	AGREEMENT
SOLID	Cr-51	7.18E-05	6.74E-05	1.07	20	AGREEMENT
DET. 1	Cs-134	1.49E-05	1.65E-05	0.90	20	AGREEMENT
	Cs-137	2.35E-05	2.37E-05	0.99	20	AGREEMENT
	Co-58	1.73E-05	1.80E-05	0.96	20	AGREEMENT
	Mn-54	3.13E-05	3.03E-05	1.03	20	AGREEMENT
	Fe-59	3.34E-05	3.24E-05	1.03	20	AGREEMENT
	Zn-65	2.73E-05	2.90E-05	0.94	20	AGREEMENT
	Co-60	2.15E-05	2.20E-05	0.98	20	AGREEMENT

A22633-66	Ce-141	6.98E-05	7.49E-05	0.93	20	AGREEMENT
SOLID	Cr-51	7.10E-05	6.74E-05	1.05	20	AGREEMENT
DET. 2	Cs-134	1.52E-05	1.65E-05	0.92	20	AGREEMENT
	Cs-137	2.46E-05	2.37E-05	1.04	20	AGREEMENT
	Co-58	1.76E-05	1.80E-05	0.98	20	AGREEMENT
	Mn-54	3.20E-05	3.03E-05	1.06	20	AGREEMENT
	Fe-59	3.33E-05	3.24E-05	1.03	20	AGREEMENT
	Zn-65	2.89E-05	2.90E-05	1.00	20	AGREEMENT
	Co-60	2.11E-05	2.20E-05	0.96	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	COMPARISON

A22633-66	Ce-141	6.89E-05	7.49E-05	0.92	20	AGREEMENT
SOLID	Cr-51	6.48E-05	6.74E-05	0.96	20	AGREEMENT
DET. 3	Cs-134	1.59E-05	1.65E-05	0.97	20	AGREEMENT
	Cs-137	2.47E-05	2.37E-05	1.04	20	AGREEMENT
	Co-58	1.77E-05	1.80E-05	0.98	20	AGREEMENT
	Mn-54	3.21E-05	3.03E-05	1.06	20	AGREEMENT
	Fe-59	3.23E-05	3.24E-05	1.00	20	AGREEMENT
	Zn-65	2.83E-05	2.90E-05	0.97	20	AGREEMENT
	Co-60	2.15E-05	2.20E-05	0.98	20	AGREEMENT

A22634-66	Ce-141	7.33E-05	7.63E-05	0.96	20	AGREEMENT
GAS	Cr-51	7.42E-05	6.86E-05	1.08	20	AGREEMENT
SIMULATED	Cs-134	1.61E-05	1.68E-05	0.96	20	AGREEMENT
DET. 1	Cs-137	2.47E-05	2.42E-05	1.02	20	AGREEMENT
	Co-58	1.81E-05	1.84E-05	0.98	20	AGREEMENT
	Mn-54	3.25E-05	3.09E-05	1.05	20	AGREEMENT
	Fe-59	3.44E-05	3.30E-05	1.04	20	AGREEMENT
	Zn-65	2.98E-05	2.96E-05	1.01	20	AGREEMENT
	Co-60	2.25E-05	2.24E-05	1.01	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS		

A22634-66	Ce-141	6.84E-05	7.63E-05	0.90	20	AGREEMENT
GAS	Cr-51	7.00E-05	6.86E-05	1.02	20	AGREEMENT
SIMULATED	Cs-134	1.52E-05	1.68E-05	0.91	20	AGREEMENT
DET. 2	Cs-137	2.37E-05	2.42E-05	0.98	20	AGREEMENT
	Co-58	1.67E-05	1.84E-05	0.91	20	AGREEMENT
	Mn-54	3.06E-05	3.09E-05	0.99	20	AGREEMENT
	Fe-59	3.24E-05	3.30E-05	0.98	20	AGREEMENT
	Zn-65	2.92E-05	2.96E-05	0.99	20	AGREEMENT
	Co-60	2.15E-05	2.24E-05	0.96	20	AGREEMENT

A22634-66	Ce-141	6.94E-05	7.63E-05	0.91	20	AGREEMENT
GAS	Cr-51	6.30E-05	6.86E-05	0.92	20	AGREEMENT
SIMULATED	Cs-134	1.58E-05	1.68E-05	0.94	20	AGREEMENT
DET. 3	Cs-137	2.35E-05	2.42E-05	0.97	20	AGREEMENT
	Co-58	1.74E-05	1.84E-05	0.95	20	AGREEMENT
	Mn-54	3.04E-05	3.09E-05	0.98	20	AGREEMENT
	Fe-59	3.10E-05	3.30E-05	0.94	20	AGREEMENT
	Zn-65	2.68E-05	2.96E-05	0.91	20	AGREEMENT
	Co-60	2.09E-05	2.24E-05	0.93	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	COMPARISON

A22635-66	Ce-141	1.10E-03	1.09E-03	1.01	20	AGREEMENT
SOLID	Cr-51	1.04E-03	9.78E-04	1.06	20	AGREEMENT
DET. 1	Cs-134	2.30E-04	2.39E-04	0.96	20	AGREEMENT
	Cs-137	3.76E-04	3.45E-04	1.09	20	AGREEMENT
	Co-58	2.76E-04	2.62E-04	1.05	20	AGREEMENT
	Mn-54	4.88E-04	4.40E-04	1.11	20	AGREEMENT
	Fe-59	5.03E-04	4.71E-04	1.07	20	AGREEMENT
	Zn-65	4.35E-04	4.22E-04	1.03	20	AGREEMENT
	Co-60	3.20E-04	3.19E-04	1.00	20	AGREEMENT

A22635-66	Ce-141	9.38E-04	1.09E-03	0.86	20	AGREEMENT
SOLID	Cr-51	8.89E-04	9.78E-04	0.91	20	AGREEMENT
DET. 2	Cs-134	2.02E-04	2.39E-04	0.84	20	AGREEMENT
	Cs-137	3.36E-04	3.45E-04	0.98	20	AGREEMENT
	Co-58	2.35E-04	2.62E-04	0.90	20	AGREEMENT
	Mn-54	4.33E-04	4.40E-04	0.98	20	AGREEMENT
	Fe-59	4.48E-04	4.71E-04	0.95	20	AGREEMENT
	Zn-65	3.99E-04	4.22E-04	0.95	20	AGREEMENT
	Co-60	2.97E-04	3.19E-04	0.93	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS		

A22635-66	Ce-141	1.03E-03	1.09E-03	0.95	20	AGREEMENT
SOLID	Cr-51	1.01E-03	9.78E-04	1.03	20	AGREEMENT
DET. 3	Cs-134	2.23E-04	2.39E-04	0.93	20	AGREEMENT
	Cs-137	3.72E-04	3.45E-04	1.08	20	AGREEMENT
	Co-58	2.71E-04	2.62E-04	1.03	20	AGREEMENT
	Mn-54	4.80E-04	4.40E-04	1.09	20	AGREEMENT
	Fe-59	4.94E-04	4.71E-04	1.05	20	AGREEMENT
	Zn-65	4.42E-04	4.22E-04	1.05	20	AGREEMENT
	Co-60	3.15E-04	3.19E-04	0.99	20	AGREEMENT

A22636-66	Ce-141	7.42E-05	7.41E-05	1.00	20	AGREEMENT
SOLID	Cr-51	7.11E-05	6.66E-05	1.07	20	AGREEMENT
DET. 4	Cs-134	1.53E-05	1.63E-05	0.94	20	AGREEMENT
	Cs-137	2.71E-05	2.35E-05	1.15	20	AGREEMENT
	Co-58	1.92E-05	1.79E-05	1.08	20	AGREEMENT
	Mn-54	3.52E-05	3.00E-05	1.17	20	AGREEMENT
	Fe-59	3.52E-05	3.21E-05	1.10	20	AGREEMENT
	Zn-65	3.11E-05	2.87E-05	1.08	20	AGREEMENT
	Co-60	2.21E-05	2.17E-05	1.02	20	AGREEMENT

RESULTS OF RADIOCHEMISTRY

CROSS CHECK PROGRAM

ENTERGY

PALISADES PLANT

3rd QUARTER 2008

(Ref. Date 08/15/08)


_____ 1-6-09
Daniel M. Montgomery, QA Manager

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	

A22803-66	Ce-141	9.67E-02	8.94E-02	1.08	20	AGREEMENT
CARTRIDGE	Cr-51	2.66E-01	2.65E-01	1.00	20	AGREEMENT
DET. 1	Cs-134	6.05E-02	6.43E-02	0.94	20	AGREEMENT
	Cs-137	4.63E-02	4.36E-02	1.06	20	AGREEMENT
	Co-58	7.12E-02	6.72E-02	1.06	20	AGREEMENT
	Mn-54	5.42E-02	4.81E-02	1.13	20	AGREEMENT
	Fe-59	7.25E-02	6.59E-02	1.10	20	AGREEMENT
	Zn-65	1.02E-01	9.44E-02	1.08	20	AGREEMENT
	Co-60	6.50E-02	6.37E-02	1.02	20	AGREEMENT

A22803-66	Ce-141	8.64E-02	8.94E-02	0.97	20	AGREEMENT
CARTRIDGE	Cr-51	2.59E-01	2.65E-01	0.98	20	AGREEMENT
DET. 2	Cs-134	6.03E-02	6.43E-02	0.94	20	AGREEMENT
	Cs-137	4.75E-02	4.36E-02	1.09	20	AGREEMENT
	Co-58	7.14E-02	6.72E-02	1.06	20	AGREEMENT
	Mn-54	5.54E-02	4.81E-02	1.15	20	AGREEMENT
	Fe-59	7.10E-02	6.59E-02	1.08	20	AGREEMENT
	Zn-65	1.00E-01	9.44E-02	1.06	20	AGREEMENT
	Co-60	6.26E-02	6.37E-02	0.98	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	

A22803-66	Ce-141	7.95E-02	8.94E-02	0.89	20	AGREEMENT
CARTRIDGE	Cr-51	2.37E-01	2.65E-01	0.89	20	AGREEMENT
DET. 3	Cs-134	5.53E-02	6.43E-02	0.86	20	AGREEMENT
	Cs-137	4.10E-02	4.36E-02	0.94	20	AGREEMENT
	Co-58	6.23E-02	6.72E-02	0.93	20	AGREEMENT
	Mn-54	4.83E-02	4.81E-02	1.00	20	AGREEMENT
	Fe-59	6.42E-02	6.59E-02	0.97	20	AGREEMENT
	Zn-65	8.93E-02	9.44E-02	0.95	20	AGREEMENT
	Co-60	5.76E-02	6.37E-02	0.90	20	AGREEMENT

A22804-66	Ce-141	1.65E-03	1.51E-03	1.09	20	AGREEMENT
SIMULATED	Cr-51	4.70E-03	4.48E-03	1.05	20	AGREEMENT
GAS	Cs-134	1.05E-03	1.09E-03	0.97	20	AGREEMENT
DET. 1	Cs-137	7.92E-04	7.37E-04	1.07	20	AGREEMENT
	Co-58	1.20E-03	1.14E-03	1.06	20	AGREEMENT
	Mn-54	9.20E-04	8.14E-04	1.13	20	AGREEMENT
	Fe-59	1.26E-03	1.11E-03	1.13	20	AGREEMENT
	Zn-65	1.72E-03	1.60E-03	1.08	20	AGREEMENT
	Co-60	1.11E-03	1.08E-03	1.03	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	COMPARISON

A22804-66	Ce-141	1.50E-03	1.51E-03	0.99	20	AGREEMENT
SIMULATED	Cr-51	4.32E-03	4.48E-03	0.97	20	AGREEMENT
GAS	Cs-134	1.02E-03	1.09E-03	0.94	20	AGREEMENT
DET.2	Cs-137	7.83E-04	7.37E-04	1.06	20	AGREEMENT
	Co-58	1.17E-03	1.14E-03	1.03	20	AGREEMENT
	Mn-54	9.06E-04	8.14E-04	1.11	20	AGREEMENT
	Fe-59	1.18E-03	1.11E-03	1.06	20	AGREEMENT
	Zn-65	1.63E-03	1.60E-03	1.02	20	AGREEMENT
	Co-60	1.04E-03	1.08E-03	0.97	20	AGREEMENT

A22804-66	Ce-141	1.33E-03	1.51E-03	0.88	20	AGREEMENT
SIMULATED	Cr-51	4.04E-03	4.48E-03	0.90	20	AGREEMENT
GAS	Cs-134	9.36E-04	1.09E-03	0.86	20	AGREEMENT
DET. 3	Cs-137	7.16E-04	7.37E-04	0.97	20	AGREEMENT
	Co-58	1.03E-03	1.14E-03	0.91	20	AGREEMENT
	Mn-54	8.06E-04	8.14E-04	0.99	20	AGREEMENT
	Fe-59	1.06E-03	1.11E-03	0.95	20	AGREEMENT
	Zn-65	1.49E-03	1.60E-03	0.93	20	AGREEMENT
	Co-60	9.58E-04	1.08E-03	0.89	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	

A22805-66	Ce-141	3.68E-05	3.74E-05	0.98	20	AGREEMENT
SAND	Cr-51	1.21E-04	1.11E-04	1.09	20	AGREEMENT
DET. 1	Cs-134	2.61E-05	2.69E-05	0.97	20	AGREEMENT
	Cs-137	1.92E-05	1.83E-05	1.05	20	AGREEMENT
	Co-58	2.83E-05	2.81E-05	1.01	20	AGREEMENT
	Mn-54	2.21E-05	2.01E-05	1.10	20	AGREEMENT
	Fe-59	2.70E-05	2.76E-05	0.98	20	AGREEMENT
	Zn-65	3.99E-05	3.95E-05	1.01	20	AGREEMENT
	Co-60	2.60E-05	2.67E-05	0.97	20	AGREEMENT

A22805-66	Ce-141	3.60E-05	3.74E-05	0.96	20	AGREEMENT
SAND	Cr-51	1.09E-04	1.11E-04	0.98	20	AGREEMENT
DET. 2	Cs-134	2.56E-05	2.69E-05	0.95	20	AGREEMENT
	Cs-137	1.87E-05	1.83E-05	1.02	20	AGREEMENT
	Co-58	2.83E-05	2.81E-05	1.01	20	AGREEMENT
	Mn-54	2.15E-05	2.01E-05	1.07	20	AGREEMENT
	Fe-59	2.86E-05	2.76E-05	1.04	20	AGREEMENT
	Zn-65	3.85E-05	3.95E-05	0.97	20	AGREEMENT
	Co-60	2.60E-05	2.67E-05	0.97	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS		

A22805-66	Ce-141	3.49E-05	3.74E-05	0.93	20	AGREEMENT
SAND	Cr-51	1.02E-04	1.11E-04	0.92	20	AGREEMENT
DET. 3	Cs-134	2.44E-05	2.69E-05	0.91	20	AGREEMENT
	Cs-137	1.80E-05	1.83E-05	0.99	20	AGREEMENT
	Co-58	2.64E-05	2.81E-05	0.94	20	AGREEMENT
	Mn-54	1.96E-05	2.01E-05	0.97	20	AGREEMENT
	Fe-59	2.68E-05	2.76E-05	0.97	20	AGREEMENT
	Zn-65	3.74E-05	3.95E-05	0.95	20	AGREEMENT
	Co-60	2.44E-05	2.67E-05	0.91	20	AGREEMENT


A22805-66	Ce-141	3.51E-05	3.74E-05	0.94	20	AGREEMENT
SAND	Cr-51	9.96E-05	1.11E-04	0.90	20	AGREEMENT
DET. 4	Cs-134	2.14E-05	2.69E-05	0.79	20	AGREEMENT
	Cs-137	1.85E-05	1.83E-05	1.01	20	AGREEMENT
	Co-58	2.63E-05	2.81E-05	0.93	20	AGREEMENT
	Mn-54	2.18E-05	2.01E-05	1.08	20	AGREEMENT
	Fe-59	2.82E-05	2.76E-05	1.02	20	AGREEMENT
	Zn-65	3.98E-05	3.95E-05	1.01	20	AGREEMENT
	Co-60	2.53E-05	2.67E-05	0.95	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	

A22806-66	Ce-141	5.21E-02	4.94E-02	1.06	20	AGREEMENT
CARTRIDGE	Cr-51	1.44E-01	1.46E-01	0.98	20	AGREEMENT
DET. 1	Cs-134	3.29E-02	3.55E-02	0.93	20	AGREEMENT
	Cs-137	2.53E-02	2.41E-02	1.05	20	AGREEMENT
	Co-58	3.82E-02	3.71E-02	1.03	20	AGREEMENT
	Mn-54	2.93E-02	2.66E-02	1.10	20	AGREEMENT
	Fe-59	3.94E-02	3.64E-02	1.08	20	AGREEMENT
	Zn-65	5.43E-02	5.21E-02	1.04	20	AGREEMENT
	Co-60	3.51E-02	3.52E-02	1.00	20	AGREEMENT

A22806-66	Ce-141	4.60E-02	4.94E-02	0.93	20	AGREEMENT
CARTRIDGE	Cr-51	1.42E-01	1.46E-01	0.97	20	AGREEMENT
DET. 2	Cs-134	3.27E-02	3.55E-02	0.92	20	AGREEMENT
	Cs-137	2.58E-02	2.41E-02	1.07	20	AGREEMENT
	Co-58	3.85E-02	3.71E-02	1.04	20	AGREEMENT
	Mn-54	3.02E-02	2.66E-02	1.14	20	AGREEMENT
	Fe-59	3.85E-02	3.64E-02	1.06	20	AGREEMENT
	Zn-65	5.49E-02	5.21E-02	1.05	20	AGREEMENT
	Co-60	3.41E-02	3.52E-02	0.97	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	
A22806-66	Ce-141	4.23E-02	4.94E-02	0.86	20	AGREEMENT
CARTRIDGE	Cr-51	1.24E-01	1.46E-01	0.85	20	AGREEMENT
DET. 3	Cs-134	2.92E-02	3.55E-02	0.82	20	AGREEMENT
	Cs-137	2.22E-02	2.41E-02	0.92	20	AGREEMENT
	Co-58	3.34E-02	3.71E-02	0.90	20	AGREEMENT
	Mn-54	2.50E-02	2.66E-02	0.94	20	AGREEMENT
	Fe-59	3.40E-02	3.64E-02	0.93	20	AGREEMENT
	Zn-65	4.75E-02	5.21E-02	0.91	20	AGREEMENT
	Co-60	3.02E-02	3.52E-02	0.86	20	AGREEMENT

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RESULTS OF RADIOCHEMISTRY

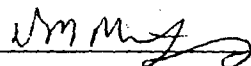
CROSS CHECK PROGRAM

ENTERGY

PALISADES

4th QUARTER 2008

(Ref. Date 11/14/08)



2-17-09

Daniel M. Montgomery, QA Manager

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	COMPARISON

A23105A-66	Ce-141	2.98E-02	2.75E-02	1.08	20	AGREEMENT
CARTRIDGE	Cr-51	4.31E-02	3.90E-02	1.11	20	AGREEMENT
RGEM	Cs-134	1.11E-02	1.11E-02	1.00	20	AGREEMENT
DET. 1	Cs-137	1.12E-02	9.68E-03	1.16	20	AGREEMENT
	Co-58	1.22E-02	1.10E-02	1.11	20	AGREEMENT
	Mn-54	1.50E-02	1.30E-02	1.15	20	AGREEMENT
	Fe-59	1.48E-02	1.23E-02	1.20	20	AGREEMENT
	Zn-65	1.80E-02	1.59E-02	1.13	20	AGREEMENT
	Co-60	1.17E-02	1.08E-02	1.08	20	AGREEMENT

A23105A-66	Ce-141	2.64E-02	2.75E-02	0.96	20	AGREEMENT
CARTRIDGE	Cr-51	3.84E-02	3.90E-02	0.98	20	AGREEMENT
RGEM	Cs-134	1.07E-02	1.11E-02	0.96	20	AGREEMENT
DET. 2	Cs-137	1.10E-02	9.68E-03	1.14	20	AGREEMENT
	Co-58	1.20E-02	1.10E-02	1.09	20	AGREEMENT
	Mn-54	1.48E-02	1.30E-02	1.14	20	AGREEMENT
	Fe-59	1.40E-02	1.23E-02	1.14	20	AGREEMENT
	Zn-65	1.77E-02	1.59E-02	1.11	20	AGREEMENT
	Co-60	1.11E-02	1.08E-02	1.03	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	COMPARISON

A23105A-66	Ce-141	2.34E-02	2.75E-02	0.85	20	AGREEMENT
CARTRIDGE	Cr-51	3.42E-02	3.90E-02	0.88	20	AGREEMENT
RGEM	Cs-134	9.33E-03	1.11E-02	0.84	20	AGREEMENT
DET. 3	Cs-137	9.08E-03	9.68E-03	0.94	20	AGREEMENT
	Co-58	9.94E-03	1.10E-02	0.90	20	AGREEMENT
	Mn-54	1.25E-02	1.30E-02	0.96	20	AGREEMENT
	Fe-59	1.21E-02	1.23E-02	0.98	20	AGREEMENT
	Zn-65	1.50E-02	1.59E-02	0.94	20	AGREEMENT
	Co-60	9.88E-03	1.08E-02	0.91	20	AGREEMENT

A23106-66	Ce-141	8.55E-03	8.90E-03	0.96	20	AGREEMENT
SOLID	Cr-51	1.20E-02	1.26E-02	0.95	20	AGREEMENT
7.2 mL	Cs-134	3.75E-03	3.59E-03	1.04	20	AGREEMENT
DET. 1	Cs-137	3.24E-03	3.13E-03	1.03	20	AGREEMENT
	Co-58	3.74E-03	3.56E-03	1.05	20	AGREEMENT
	Mn-54	4.17E-03	4.21E-03	0.99	20	AGREEMENT
	Fe-59	4.30E-03	3.99E-03	1.08	20	AGREEMENT
	Zn-65	4.85E-03	5.16E-03	0.94	20	AGREEMENT
	Co-60	3.53E-03	3.51E-03	1.01	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS		

A23106-66	Ce-141	8.36E-03	8.90E-03	0.94	20	AGREEMENT
SOLID	Cr-51	1.15E-02	1.26E-02	0.91	20	AGREEMENT
7.2 mL	Cs-134	3.69E-03	3.59E-03	1.03	20	AGREEMENT
DET. 1 2	Cs-137	3.33E-03	3.13E-03	1.06	20	AGREEMENT
	Co-58	3.68E-03	3.56E-03	1.03	20	AGREEMENT
	Mn-54	4.34E-03	4.21E-03	1.03	20	AGREEMENT
	Fe-59	3.75E-03	3.99E-03	0.94	20	AGREEMENT
	Zn-65	5.03E-03	5.16E-03	0.97	20	AGREEMENT
	Co-60	3.45E-03	3.51E-03	0.98	20	AGREEMENT

A23106-66	Ce-141	8.46E-03	8.90E-03	0.95	20	AGREEMENT
SOLID	Cr-51	1.32E-02	1.26E-02	1.04	20	AGREEMENT
7.2 mL	Cs-134	3.56E-03	3.59E-03	0.99	20	AGREEMENT
DET. 1 3	Cs-137	3.23E-03	3.13E-03	1.03	20	AGREEMENT
	Co-58	3.39E-03	3.56E-03	0.95	20	AGREEMENT
	Mn-54	4.15E-03	4.21E-03	0.99	20	AGREEMENT
	Fe-59	3.76E-03	3.99E-03	0.94	20	AGREEMENT
	Zn-65	4.98E-03	5.16E-03	0.97	20	AGREEMENT
	Co-60	3.46E-03	3.51E-03	0.99	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS		

A23107-66	Ce-141	6.91E-02	6.74E-02	1.02	20	AGREEMENT
FILTER	Cr-51	9.65E-02	9.57E-02	1.01	20	AGREEMENT
1 cc	Cs-134	2.52E-02	2.72E-02	0.93	20	AGREEMENT
DET. 1	Cs-137	2.55E-02	2.37E-02	1.07	20	AGREEMENT
	Co-58	2.79E-02	2.70E-02	1.03	20	AGREEMENT
	Mn-54	3.45E-02	3.19E-02	1.08	20	AGREEMENT
	Fe-59	3.55E-02	3.03E-02	1.17	20	AGREEMENT
	Zn-65	4.25E-02	3.91E-02	1.09	20	AGREEMENT
	Co-60	2.74E-02	2.66E-02	1.03	20	AGREEMENT

A23107-66	Ce-141	5.81E-02	6.74E-02	0.86	20	AGREEMENT
FILTER	Cr-51	8.78E-02	9.57E-02	0.92	20	AGREEMENT
1 cc	Cs-134	2.36E-02	2.72E-02	0.87	20	AGREEMENT
DET. 2	Cs-137	2.42E-02	2.37E-02	1.02	20	AGREEMENT
	Co-58	2.66E-02	2.70E-02	0.99	20	AGREEMENT
	Mn-54	3.27E-02	3.19E-02	1.02	20	AGREEMENT
	Fe-59	3.16E-02	3.03E-02	1.04	20	AGREEMENT
	Zn-65	3.96E-02	3.91E-02	1.01	20	AGREEMENT
	Co-60	2.53E-02	2.66E-02	0.95	20	AGREEMENT

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO		COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS	RESOLUTION	

A23107-66	Ce-141	6.26E-02	6.74E-02	0.93	20	AGREEMENT
FILTER	Cr-51	8.91E-02	9.57E-02	0.93	20	AGREEMENT
1 cc	Cs-134	2.43E-02	2.72E-02	0.89	20	AGREEMENT
DET. 3	Cs-137	2.40E-02	2.37E-02	1.01	20	AGREEMENT
	Co-58	2.66E-02	2.70E-02	0.99	20	AGREEMENT
	Mn-54	3.21E-02	3.19E-02	1.01	20	AGREEMENT
	Fe-59	3.09E-02	3.03E-02	1.02	20	AGREEMENT
	Zn-65	3.92E-02	3.91E-02	1.00	20	AGREEMENT
	Co-60	2.58E-02	2.66E-02	0.97	20	AGREEMENT

A23108-66	Tritium	1.99E-03	1.52E-03	1.31	12.5	AGREEMENT
LIQUID						

SAMPLE	ANALYSIS	PALISADES	ANALYTICS	RATIO	RESOLUTION	COMPARISON
		VALUE microCi/cc	VALUE microCi/cc	PALISADES: ANALYTICS		
A22806-66	Ce-141	4.23E-02	4.94E-02	0.86	20	AGREEMENT
CARTRIDGE	Cr-51	1.24E-01	1.46E-01	0.85	20	AGREEMENT
DET. 3	Cs-134	2.92E-02	3.55E-02	0.82	20	AGREEMENT
	Cs-137	2.22E-02	2.41E-02	0.92	20	AGREEMENT
	Co-58	3.34E-02	3.71E-02	0.90	20	AGREEMENT
	Mn-54	2.50E-02	2.66E-02	0.94	20	AGREEMENT
	Fe-59	3.40E-02	3.64E-02	0.93	20	AGREEMENT
	Zn-65	4.75E-02	5.21E-02	0.91	20	AGREEMENT
	Co-60	3.02E-02	3.52E-02	0.86	20	AGREEMENT

ATTACHMENT 7

**PALISADES NUCLEAR PLANT
OFFSITE DOSE CALCULATION MANUAL**

REVISION 20

93 Pages Follow

PALISADES NUCLEAR PLANT
OFFSITE DOSE CALCULATION MANUAL

TITLE: OFFSITE DOSE CALCULATION MANUAL

Process Applicability Exclusion

JBBurnett / 2/3/09
Procedure Sponsor Date

JLFontaine / 11/13/08
Technical Reviewer Date

JBBurnett / 2/3/09
User Reviewer Date

TPKirwin / 1/21/09
General Manager Plant Operations Date

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I. GASEOUS EFFLUENTS

A. ALARM/TRIP SETPOINT METHOD

Appendix A, Section III.B.1 requires that the dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY shall be limited to the following:

- For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and
- For iodine-131, for iodine-133, for tritium, and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ.

Appendix A, Section III.A.1 requires gaseous effluent monitors to have alarm/trip setpoints to ensure that offsite concentrations, when averaged over 1 hour, will not be greater than Appendix A, Section III.B.1. This section of the ODCM describes the methodology that will be used to determine these setpoints.

The methodology for determining alarm/trip setpoints is divided into two major parts. The first consists of calculating an allowable concentration for the nuclide mixture to be released. The second consists of determining monitor response to this mixture in order to establish the physical settings on the monitors.

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1. Allowable Concentration

The total EC-fraction (R_k) for each release point will be calculated by the relationship defined by Note 4 of Appendix B, 10 CFR 20:

$$R_{(k)} = \left(\frac{X}{Q}\right)(F) \sum_i \frac{C_i}{EC_i} \leq 5.0 \quad (1.1)$$

If gaseous tritium and noble gasses are not present then:

$$R_{(k)} \leq 10$$

where:

- C_i = Actual or measured concentration, at ambient temperature and pressure of nuclide i ($\mu\text{Ci/cc}$)
- EC_i = The EC of nuclide i from 10 CFR 20, Appendix B, Table 2
- $R_{(k)}$ = The total EC-fraction for release point k
- X/Q = Most conservative sector site boundary dispersion (sec/m^3) - Table 1.3
- F = Release flow rate ($83,000 \text{ cfm} = 39.2 \text{ m}^3/\text{sec}$) for stack monitor considerations; variable for other monitors

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NOTE:

If a batch release is made while a continuous release or another batch release is in progress, the sum of all values of R_k must be less than 5.0.

2. Monitor Response

Normal radioactivity releases consist mainly of well-decayed fission gases. Therefore, monitor response calibrations are performed to fission gas typical of normal releases (mainly Xe-133). Response of monitors used to define fission product release rates under accident conditions may vary from that of Xe-133, however. Monitor response for the two categories of monitor is determined as follows:

a. Normal Release (aged fission gasses)

Total gas concentration ($\mu\text{Ci/cc}$) at the monitor is calculated. The detector response to isotopic activities ($\text{cpm}/\mu\text{Ci/cc}$) is applied to determine cpm expected. The setting for monitor alarms is established at some factor (b) greater than 1 but less than $1/R_k$ (Equation 1.1) times the measured concentration (c):

$$s = b \times c \quad (1.2)$$

b. Accident Releases

Monitors are preset to alarm at or before precalculated offsite dose rates would be achieved under hypothetical accident conditions. These setpoints are established in accordance with Emergency Plan requirements for defining Emergency Action Levels and associated actions. Emergency Implementing Procedures contain monitor-specific curves or calibration constants for conversion between cpm and $\mu\text{Ci/cc}$ (or R/hr and $\mu\text{Ci/cc}$), depending on monitor type, for fission product mixtures as a function of mixture decay time.

When these monitors are utilized for other than accident conditions, either an appropriately decayed "accident" conversion curve may be used, or a decayed fission gas calibration factor may be applied. In these cases, setpoints are established as in 1.A above.

Setpoints of accident monitors (if set to monitor normal releases) are reset to the accident alarm settings at the end of normal release. Setpoints of other release monitors are maintained at the level used at the latest release (well below the level which would allow 10 times EC to be exceeded at the site boundary), or are reset to approximately three times background in order to detect leakage or inadvertent releases of low level gases.

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B. DOSE RATE CALCULATION

1. Dose rates are calculated for (1) noble gases and (2) iodines and particulates. Dose rates as defined in this section are based on 10 CFR 50 Appendix I limits of mrem per quarter and millirem per year. All dose pathways of major importance in the Palisades environs are considered.
 - a. Equations and assumptions for calculating doses from noble gases are as follows:
 - 1) Assumptions
 - a) Doses to be calculated are the maximum offsite point in air, total body and skin.
 - b) Exposure pathway is submersion within a cloud of noble gases.
 - c) Noble gas radionuclide mix is based on the historically observed source term given in Table 1.1, plus additional nuclides.
 - d) Basic radionuclide data are given in Table 1.2.
 - e) All releases are treated as ground-level.
 - f) Meteorological data expressed as joint-frequency distribution of wind speed, wind direction, and atmospheric stability for the period resulting in X/Q's and D/Q's shown in Table 1.3.
 - g) Raw meteorological data consists of wind speed and direction measurements at 10m and temperature measurements at 10m and 60m.
 - h) Dose is to be evaluated at the offsite exposure points where maximum concentrations are expected to exist (overland sector site boundaries), and nearest residents.
 - i) Potential maximum population (resident) exposure points are identified in Table 1.4.

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- j) A semi-infinite cloud model is used.
- k) Radioactive decay is considered for the plume.
- l) Building wake effects on effluent dispersion are considered.
- m) A sector-average dispersion equation is used.
- n) The wind speed classes that are used are as follows:

<u>Wind Speed</u> <u>Class Number</u>	<u>Range (m/s)</u>	<u>Midpoint (m/s)</u>
1	0.0-0.4	0.2
2	0.4-1.5	0.95
3	1.5-3.0	2.25
4	3.0-5.0	4.0
5	5.0-7.5	6.25
6	7.5-10.0	8.75
7	> 10.0	--

- o) The stability classes that will be used are the standard A through G classifications. The stability classes 1-7 will correspond to A=1, B=2, ..., G=7.
- p) Terrain effects are not considered.

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2) Equations

To calculate the dose for any one of the exposure points, the following equations are used.

For determining the air concentration of any radionuclide:

$$X_i = \sum_{j=1}^9 \sum_{k=1}^7 \left(\frac{2}{\pi} \right)^{1/2} \frac{f_{jk} Q_i p}{\sum_{zk} U^j (2\pi x/n)} \left[\exp \left(-\lambda_i \frac{x}{u_j} \right) \right] \quad (1.3)$$

where:

X_i = Air concentration of radionuclide i , $\mu\text{Ci}/\text{m}^3$.

f_{jk} = Joint relative frequency of occurrence of winds in wind speed class j , stability class k , blowing toward this exposure point, expressed as a fraction.

Q_i = Average release rate of radionuclide i , $\mu\text{Ci}/\text{s}$.

p = Fraction of radionuclide remaining in plume.

\sum_{zk} = Vertical dispersion coefficient for stability class k (m).

u_j = Midpoint value of wind speed class interval j , m/s.

x = Downwind distance, m.

n = Number of sectors, 16.

λ_i = Radioactive decay coefficient of radionuclide i , s^{-1} .

$2\pi x/n$ = Sector width at point of interest, m.

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For determining the total body dose rate:

$$D_{TB} = \sum_i X_i DFB_i \quad (1.4)$$

where:

D_{TB} = Total body dose rate, mrem/y.

X_i = Air concentration of radionuclide i , $\mu\text{Ci}/\text{m}^3$.

DFB_i = Total body dose factor due to gamma radiation, mrem/y per $\mu\text{Ci}/\text{m}^3$ (Table 1.5).

For determining the skin dose rate:

$$D_s = \sum_i X_i (DFS_i + 1.11 DFY_i) \quad (1.5)$$

where:

D_s = Skin dose rate, mrem/y.

X_i = Air concentration of radionuclide i , $\mu\text{Ci}/\text{m}^3$

DFS_i = Skin dose factor due to beta radiation, mrem/y per $\mu\text{Ci}/\text{m}^3$ (Table 1.5).

1.11 = The average ratio of tissue to air energy absorption coefficients, mrem/mrad.

DFY_i = Gamma-to-air dose factor for radionuclide i , mrad/y per $\mu\text{Ci}/\text{m}^3$ (Table 1.5).

For determining dose rate to a point in air:

$$D_a = \sum_i X_i (DFY_i \text{ or } DFB_i) \quad (1.6)$$

where:

D_a = Air dose rate, mrad/yr.

DFB_i = Air dose factor for beta radiation (Table 1.5).

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- b. Equations and assumptions for calculating doses from radioiodines and particulates are as follows:
- 1) Assumptions
 - a) Dose is to be calculated for the critical organ, thyroid, and the critical age groups (adult, teen, child, infant), infant (milk) and child (green, leafy vegetables).
 - b) Exposure pathways from iodines and particulates are milk ingestion, ground contamination, green leafy vegetables from home gardens, and inhalation.
 - c) The radioiodine and particulate mix is based on the historically observed source term given in Table 1.1.
 - d) Basic radionuclide data are given in Table 1.2.
 - e) All releases are treated as ground-level.
 - f) Mean annual average X/Q's are given in Table 1.3.
 - g) Raw meteorological data for ground-level releases consist of wind speed and direction measurements at 10m and temperature measurements at 10m and 60m.
 - h) Dose is to be evaluated at the potential offsite exposure points where maximum doses to man are expected to exist.
 - i) Real cow, goat and garden locations are considered.
 - j) Potential maximum exposure points (Table 1.4) considered are the nearest cow, goat, and home garden locations in each sector.
 - k) Terrain effects and open terrain recirculation factors are not considered.
 - l) Building wake effects on effluent dispersion are considered.
 - m) Plume depletion and radioactive decay are considered for air-concentration calculations.

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- n) Radioactive decay is considered for ground-concentration calculations.
- o) Deposition is calculated based on the curves given in Figure 1.2.
- p) Milk cows and goats obtain 100% of their food from pasture grass May through October of each year. Use default values of 0.58 for cows and 0.67 for goats for fraction of year on pasture.

2) Equations

To calculate the dose for any one of the potential maximum-exposure points, the following equations in Section 1.2.2 are used.

a) Inhalation

Equation for calculating air concentration, X_i is the same as in the Noble Gas Section (Equation 1.3).

For determining the organ dose rate:

$$D_i = 1 \times 10^6 \sum_i X_i DFI_i BR \quad (1.7)$$

where:

D_i = Organ dose rate due to inhalation, mrem/y.

X_i = Air concentration of radionuclide i , $\mu\text{Ci}/\text{m}^3$.

DFI_i = Inhalation dose factor, mrem/pCi
(Table 1.7).

BR = Breathing rate 1400 m^3/y infant;
3700 m^3/y child; or 8000 m^3/y teen and
adult.

1×10^6 = pCi/ μCi conversion factor.

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b) Ground Contamination

For determining the ground concentration of any nuclide;

$$G_i = 3.15 \times 10^7 \sum_{k=1}^7 \frac{f_k Q_i DR}{(2\pi x/n) \lambda_i} [1 - \exp(-\lambda_i t_b)] \quad (1.8)$$

where:

G_i = Ground concentration of radionuclide i, $\mu\text{Ci}/\text{m}^2$.

k = Stability class.

f_k = Joint relative frequency of occurrence of winds in stability class k blowing toward this exposure point, expressed as a fraction.

Q_i = Average release rate of radionuclide i, $\mu\text{Ci}/\text{s}$.

DR = Relative deposition rate, m^{-1} (Fig 1.2).

x = Downwind distance, m.

n = Number of sectors, 16.

$2\pi x/n$ = Sector width at point of interest, m.

λ_i = Radioactive decay coefficient of radionuclide i, y^{-1} .

t_b = Time for buildup of radionuclides on the ground, 15 y.

3.15×10^7 = s/y conversion factor.

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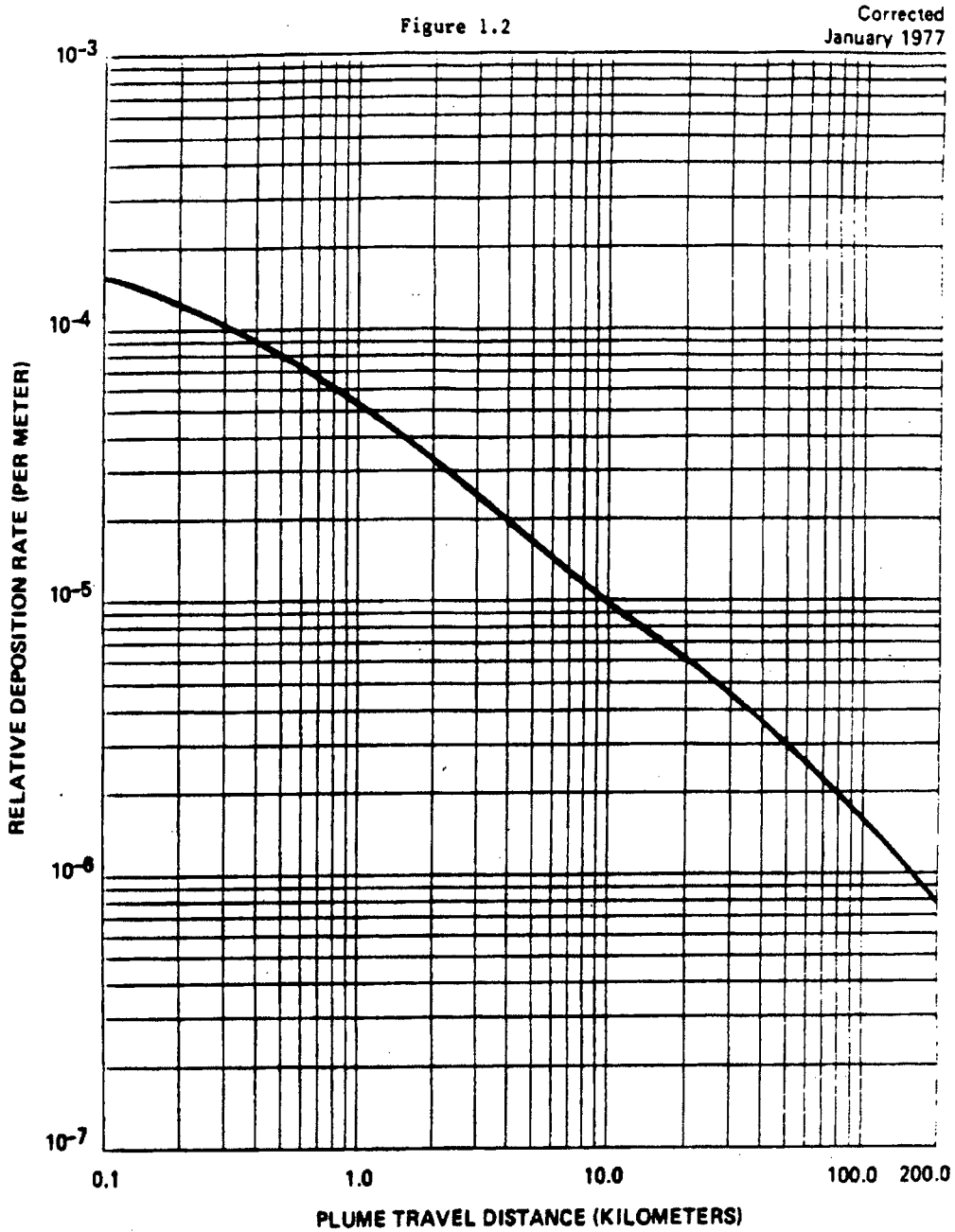


Figure 7. Relative Deposition for Ground Level Releases (All Atmospheric Stability Classes)

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For determining the total body or organ dose rate from ground contamination:

$$D_G = (8,760)(1 \times 10^6)(0.7) \sum_i G_i DFG_i \quad (1.9)$$

where:

D_G = Dose rate due to ground contamination, mrem/y.

G_i = Ground concentration of radionuclide i , $\mu\text{Ci}/\text{m}^2$.

DFG_i = Dose factor for standing on contaminated ground, mrem/h per pCi/m^2 (Table 1.8).

8,760 = Occupation time, h/y.

1×10^6 = $\text{pCi}/\mu\text{Ci}$ conversion factor.

0.7 = Shielding factor accounting for a distance of 1.0 meter above ordinary ground, dimensionless.

c) Milk and Vegetation Ingestion

For determining the concentration of any nuclide (except C-14 and H-3) in and on vegetation:

$$CV_i = 3,600 \sum_{k=1}^7 \frac{f_k Q_i DR}{(2\pi x/n)} \left(\frac{r[1 - \exp(-\lambda_{Ei}t_0)]}{Y_v \lambda_{Ei}} + B_{WV} \left[\frac{1 - \exp(-\lambda_i t_b)}{P \lambda_i} \right] \right) \left[\exp(-\lambda_i t_h) \right] \quad (1.10)$$

where:

CV_i = Concentration of radionuclide i in and on vegetation, $\mu\text{Ci}/\text{kg}$.

k = Stability class.

f_k = Frequency of this stability class and wind direction combination, expressed as a fraction.

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Q_i	=	Average release rate of radionuclide i, $\mu\text{Ci/s}$.
DR	=	Relative deposition rate, m^{-1} (Figure 1.2).
x	=	Downwind distance, m.
n	=	Number of sectors, 16.
$2\pi x/n$	=	Sector width at point of interest, m.
r	=	Fraction of deposited activity retained on vegetation (1.0 for iodines, 0.2 for particulates).
λ_{Ei}	=	Effective removal rate constant, $\lambda_{Ei} = \lambda_i + \lambda_w$, where λ_i is the radioactive decay coefficient, h^{-1} , and λ_w is a measure of physical loss by weathering ($\lambda_w = 0.0021 \text{ h}^{-1}$).
t_e	=	Period over which deposition occurs, 720 h.
Y_v	=	Agricultural yield, 0.7 kg/m^2 .
B_{iv}	=	Transfer factor from soil to vegetation of radionuclide i (Table 1.6).
λ_i	=	Radioactive decay coefficient of radionuclide i, h^{-1} .
t_b	=	Time for buildup of radionuclides on the ground, $1.31 \times 10^5 \text{ h}$ (15Y).
ρ	=	Effective surface density of soil, 240 kg/m^2 .
3,600	=	s/h conversion factor.
t_h	=	Holdup time between harvest and consumption of food (2,160 hours for stored food).

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For determining the concentration of C-14 in vegetation:

$$CV_{14} = 1 \times 10^3 X_{14} (0.11/0.16) \quad (1.11)$$

where:

CV_{14} = Concentration of C-14 in vegetation, $\mu\text{Ci}/\text{kg}$.

X_{14} = Air concentration of C-14, $\mu\text{Ci}/\text{m}^3$.

0.11 = Fraction of total Plant mass that is natural carbon.

0.16 = Concentration of natural carbon in the atmosphere, g/m^3 .

1×10^3 = g/kg conversion factor.

For determining the concentration of H-3 in vegetation:

$$CV_T = 1 \times 10^3 X_T (0.75)(0.5/H) \quad (1.12)$$

where:

CV_T = Concentration of H-3 in vegetation, $\mu\text{Ci}/\text{m}^3$.

X_T = Air concentration of H-3, $\mu\text{Ci}/\text{m}^3$.

0.75 = Fraction of total Plant mass that is water.

0.5 = Ratio of tritium concentration in Plant water to tritium concentration in atmospheric water.

H = Absolute humidity of the atmosphere, g/m^3 .

1×10^3 = g/kg conversion factor.

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For determining the concentration of any nuclide in cow's or goat's milk:

$$CM_i = CV_i FM_i Q_f \exp(-\lambda_i t_f) \quad (1.13)$$

where:

CM_i = Concentration of radionuclide i (including C-14 and H-3) in milk, $\mu\text{Ci/l}$.

CV_i = Concentration of radionuclide i in and on vegetation, $\mu\text{Ci/kg}$.

FM_i = Transfer factor from feed to milk for radionuclide i , d/l (Table 1.6).

Q_f = Amount of feed consumed by the milk animal per day, kg/d (cow, 50 kg/d or goat 6 kg/d).

λ_i = Radioactive decay coefficient of radionuclide i , d^{-1} .

t_f = Transport time of activity from feed to milk to receptor, 2 days.

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For determining the organ dose rate from ingestion of green leafy vegetables and milk:

$$D = 1 \times 10^6 \sum_i C_{M_i} DF_i UM \quad (1.14)$$

where:

D = Organ dose rate due to ingestion, mrem/y.

C_{M_i} = Concentration of radionuclide i in vegetables or milk, $\mu\text{Ci/kg}$ (or liters).

DF_i = Ingestion dose factor, mrem/pCi (Table 2.1).

UM = Ingestion rate for milk, 330 l/y; for vegetables 26 kg/yr (child), no ingestion by infant.

1×10^6 = pCi/ μCi conversion factor.

d) **Meat Ingestion (Beef)**

To calculate the concentration of a nuclide in animal flesh:

$$C_{fi} = F_{fi} CV_i Q_{fi} \exp(-\lambda_i t) \quad (1.15)$$

where:

C_{fi} = Concentration of nuclide i in the animal flesh, pCi/kg.

F_{fi} = Fraction of animal's daily intake which appears in each kg of flesh, days/kg (Table 1.6).

CV_i = Concentration of radionuclide i in the animal's feed (Equation 1.10).

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Q_f = Amount of feed consumed by the cow per day, 50 kg/d.

t_s = Average time from slaughter to consumption, 20 days.

To determine the organ dose from ingestion of beef:

$$D^I = \sum_i C_{fi} D_{fi} U_f \quad (1.16)$$

where:

D_{fi} = Ingestion dose factor for age group, mrem/pCi (Table 2.1) for nuclide i.

U_f = Ingestion rate of meat for age group, kg/y (child-41, teen-65, adult-110).

e) Organ Dose Rates

For determining the total body and organ dose rate from iodines and particulates:

$$D = D_I + D_G + D_M + D_V + D_F \quad (1.17)$$

where:

D = Total organ dose rate, mrem/y.

D_I = Dose rate due to inhalation, mrem/y.

D_G = Dose rate due to ground contamination, mrem/y.

D_M = Dose rate due to milk ingestion, mrem/y.

D_V = Dose rate due to vegetable ingestion, mrem/y.

D_F = Dose rate due to beef ingestion, mrem/y.

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- 3) The maximum organ dose rate, maximum total body dose rate, and maximum skin dose rate calculated in the previous section (Sec I.B) are used to calculate design basis quantities as described in Section I.B.1.3.

c. Design Basis Quantities

The design basis quantity of a radionuclide emitted to the atmosphere is the amount of that nuclide, when released in one year, which would result in a dose not exceeding any of the following:

- 1) 15 millirem to any organ of an individual from iodines and particulates with half-life greater than 8 days (Appendix A, Section III.D.1).
- 2) 15 millirem to skin of an individual from noble gas (Appendix A, Section III.C.1.b).
- 3) 5 millirem to the total body of an individual from noble gas (Appendix A, Section III.C.1.a).

Design basis quantity (Ci) is the smallest value for each nuclide, calculated by dividing the dose limits (a through c above) by the appropriate dose calculated from the amount of radionuclide (Ci) used to conservatively estimate the doses of Section D, as listed in Table 1.1 (or a hypothetical 1 Ci/year); the result is then multiplied by the amount of radionuclide used.

$$DBQ = \frac{D_{AI}}{D_c} (C_c) \quad (1.18)$$

where:

- D_{AI} = Appendix I dose limit (mrem or mrad).
 D_c = Calculated dose (mrem or mrad).
 C_c = Quantity of nuclide resulting in dose D_c (Ci).
DBQ = Design Basis Quantity (Ci).

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The limiting values for Design Basis Quantities for radionuclides released to the atmosphere are given in Table 1.9.

The inverse of the ratio C_d/D_c in the above equation (ie, D_d/C_c) is a useful value, since it represents the most limiting dose per unit quantity of each nuclide released. Use of the D_d/C_c ratio in quarterly evaluation of offsite dose is discussed in Section D. Values of D_d/C_c are given in Table 1.9.

d. Land Use Census and DBQ Changes

Appendix A, Sections J.3.b and J.3.c describe the requirements for an annual land use census and revision of the ODCM for use in the following calendar year. Areas of the ODCM which will be reviewed, and changed if appropriate, are Table 1.4 (Land Use Census Data by Sector), Table 1.4a (Critical Receptors), and Table 1.9 (Gaseous Design Basis Quantities). Changes will be effective on January 1 of the year following the year of the survey.

e. Gaseous Releases From the Steam Generator Blowdown Vent and Atmosphere Release Valves

Releases from the steam generator blowdown vent and atmospheric relief valves are difficult to quantify as there are no sampling capabilities on these steam release systems. However, neither system is a normal release path. The steam generator blowdown vent is normally routed to the main condenser and recirculated. Radioactive releases will be calculated by analyzing steam generator blowdown liquid and assuming that 100 percent of Noble Gases, 10 percent of the Iodines and 1 percent of the Particulates will be released to the environment in the steam phase. Volumes will be released to the environment in the steam phase. Volumes will be calculated using water balances or alternate means as available.

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C. **DESIGN BASIS QUANTITY (DBQ) LIMITS ON BATCH AND CONTINUOUS RELEASES**

1. **Batch Releases**

For each batch release (waste decay tank release or Containment purge), the quantity of each nuclide identified is summed with the quantity of that nuclide released since the first of the current calendar year. The cumulative total for each nuclide then is divided by the design basis quantity for each nuclide (from Table 1.9), and the resultant fractions are summed in order to assure that the sum fraction of all nuclides does not exceed 1.0:

$$\sum_i \frac{A_i}{(DBQ)_i} < 1.0 \quad (1.19)$$

The amount in any calendar quarter should not exceed 0.5. This is checked by subtracting the value obtained at the end of the previous quarter from the value obtained from the cumulative total to date, including the batch to be released.

2. **Continuous Releases**

Low level continuous releases from the vent gas collection header and other low level sources are totaled on a weekly basis and summed with any batch releases for the week in order to establish the cumulative DBQ fraction from batch plus continuous released for the year-to-date. Calculations are performed in the same manner as for batch releases described in C.1.

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3. Exceeding DBQ Limits

As discussed under B.1.3, the DBQ is a very conservative estimate of activity which could give doses at Appendix I limits. Because different organs are summed together and doses to different people are summed, the DBQ typically overestimates dose by about a factor of five. Thus, if calculations of DBQ fraction exceed 1.0 for year-to-date or 0.5 for the quarter, technical specifications probably still would not be exceeded. However, further discretionary releases should be deferred until an accurate assessment of dose is made by use of GASPARG computer code or by analysis of appropriate release data via the segment gaussian dose model used in emergency planning (inhalation dose, total body external dose, and boundary dose in air). See also Section D.1.2.

It should be noted that Palisades Plant to date (based on review of semiannual effluent data) has never exceeded the annual or quarterly DBQ fraction, despite its conservatism. Thus, it is not expected that an alternate to the DBQ method will be required unless the Plant is in a significantly off-normal condition.

4. Releasing Radionuclides Not Listed in Table 1.9

Table 1.9 contains all nuclides identified to date as routine constituents of gaseous releases at Palisades Plant, plus those common to PWRs in general, even if not previously detected at Palisades. From time to time, however, other nuclides may be detected.

If the unlisted nuclide constitutes less than 10% of the EC-fraction for the release, and all unlisted nuclides total less than 25% of the EC-fraction, the nuclide may be considered not present.

If the unlisted nuclide constitutes greater than 10% of the EC-fraction, or all unlisted nuclides together constitute greater than 25%, then each nuclide should be assigned a DBQ equal to the most conservative value listed for the physical form of the nuclide involved (noble gas, halogen, or particulate).

Should a nuclide not listed in Table 1.9 begin to appear in significant quantities on a routine basis, revision to this ODCM should be made in order to include a design basis quantity specific to that nuclide.

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D. OPTIONAL QUARTERLY DOSE CALCULATIONS

1. Methodology for Optional Quarterly Dose Calculations

This option may be used in place of, or in addition to, the Design Basis Quantity (DBQ) fraction calculation described by Equation 1.19. This optional conservative calculation relates the DBQ fraction to the doses from which it was originally derived. Use of this method may assist in identification of the critical dose pathway or characteristics of the assumed critical individual (infant, child, teen, and adult), since Table 1.9 indicates these parameters.

a. Simplified Conservative Approach

This method utilizes a limiting dose concept such that the limiting dose for each nuclide is summed with the limiting dose for each other nuclide, regardless if such sum is physically possible. It also assumes critical pathways, such as milk and vegetables, are in effect even in winter when the pathway is absent.

As such, the method is highly conservative and significantly over-estimates dose. If limits appear to be exceeded by this method, Section D.1.2 (a concise method, but requiring computer support) will be utilized.

1) Assumptions

- a) All assumptions of Section 1.1 are utilized.
- b) Limiting doses for each gaseous nuclide are summed, regardless of limiting decay mode (gamma or beta).
- c) Limiting doses for each particulate and iodine nuclide are summed, regardless of dose point location, exposure pathway, or organ affected.
- d) Doses are summed for detected nuclides such that all nuclides which contribute greater than 10% individually or 25% in aggregate, to the EC of released radioactivity, are included in the dose calculation.

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2) Equations

For determining gaseous effluent dose:

$$D_G = \sum_0^i A_{iG} (D_c / C_c)_{iG} < 5 \text{ millirad/quarter, } 10 \text{ mrad/yr} \quad (1.20)$$

where:

D_G = Dose from gaseous effluents (mrad).

A_{iG} = Quantity of gaseous nuclide i released (Ci).

$(D_c / C_c)_{iG}$ = Dose per Ci factor for gaseous nuclide i (mrad/Ci).

The limit for this mixture is conservatively taken as that for gamma exposure (5 mrem/quarter, 10 mrem/year) although as indicated in Table 1.9, a majority of the gaseous effluents are beta-limiting and on an individual basis have the higher limit of 10 millirem/quarter and 20 millirem/year.

For determining tritium, particulate and iodine dose to organs:

$$D_{TPI} = \sum A_{TPIi} (D_c / C_c)_{TPIi} < 7.5 \text{ mrem/q, } 15 \text{ mrem/y} \quad (1.21)$$

where:

D_{TPI} = Dose from particulates and iodines (mrem).

A_{TPIi} = Quantity of particulate or iodine nuclide i released (Ci).

$(D_c / C_c)_{TPIi}$ = Dose per Ci factor for particulate or iodine nuclide i (mrad/Ci).

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b. Realistic Calculation

This methodology is to be used if the highly conservative calculations described in C.1 or D.1 yield values that appear to exceed applicable limits.

Doses for released particulates, iodines and noble gases will be determined by use of the NRC GASPAR computer code. The computer run will utilize the annual average joint frequency meteorological data based on not less than 3 years of meteorological measurement, and will reflect demographic and land use information from the land use survey generated in the most recent prior year. Where appropriate, seasonal adjustments will be applied to obtain realistic dose estimates since both recreational and agricultural activities can vary greatly in relation to season of the year.

An alternative to GASPAR for offsite dose calculation is the use of the Palisades Segmented Gaussian Plume Emergency offsite dose calculation program. This dose model allows evaluation of dose under the actual meteorological conditions present at the time of release. It is anticipated that the system may be used in major short-term releases such as Containment purges are to be made under conditions which depart significantly from mean annual conditions.

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E. GASEOUS RADWASTE TREATMENT SYSTEM OPERATION

The gaseous radwaste treatment system (GRTS) described below shall be maintained and operated to keep releases ALARA.

1. System Description

A flow diagram for the GRTS is given in Figure 1-1. The system consists of three waste-gas compressor packages, six gas decay tanks, and the associated piping, valves, and instrumentation. Gaseous wastes are received from the following: degassing of the reactor coolant and purging of the volume control tank prior to a cold shutdown, displacing of cover gases caused by liquid accumulation in the tanks connected to the vent header, and boron recycle process operation.

Design of the system precludes hydrogen explosion by means of ignition source elimination (diaphragm valves, low flow diaphragm compressors and system electrical grounding), and minimization of leakage outside the system. Explosive mixtures of hydrogen and oxygen have been demonstrated compatible with the system by operational experience.

2. Determination of Satisfactory Operation

Design basis quantity fraction will be calculated for batch and continuous releases as described in Section I.C. These calculations will be used to ensure that the GRTS is operating as designed. Because the Plant was designed to collect and hold for decay a vast majority of the high level gases generated within the primary system, and because the operating history of the Plant has demonstrated the system's consistent performance well below Appendix I limits, no additional operability requirements are specified.

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F. RELEASE RATE FOR OFFSITE EC

10 CFR 20.1302 requires radioactive effluent releases to unrestricted areas be in concentrations less than the limits specified in Appendix B, Table 2 when averaged over a period not to exceed one year. (Note: there are no unrestricted areas anywhere within the site boundary as defined by Figure 1-1.) Concentrations at this level if inhaled or ingested continuously for one year will result in a dose of 50 mrem whole body except for submersion dose isotopes (gaseous tritium and noble gases) which will result in a dose of 100 mrem whole body. 10 CFR 50.36a requires that the release of radioactive materials be kept as low as reasonably achievable. However, the section further states that the licensee is permitted the flexibility of operation, to assure a dependable source of power even under unusual operating conditions, to release quantities of material higher than a small percentage of 10 CFR 20.1302 limits but still within those limits. Appendix I to 10 CFR 50 provides the numerical guidelines on limiting conditions for operations to meet the as low as reasonably achievable requirement.

The GASPAR code has been run to determine the dose due to external radiation and inhalation. The source term used is listed in Table 1.1. The meteorology data is given in Table 1.3. Dose using annual average meteorology, to the most limiting organ of the person assume to be residing at the site boundary with highest X/Q, is 2.15E-02 mrem (for one year). The release rate which would result in a dose rate equivalent to 50 mrem/year (using the more conservative total body limit) is the curies/year given in Table 1.1 multiplied by 50/2.15E-02 or 0.11 Ci/sec.

G. PARTICULATE AND IODINE SAMPLING

Particulate and iodine samples are obtained from the continuous sample stream pulled from the Plant stack. Samples typically are obtained to represent an integrated release from a gas batch (waste gas decay tank or Containment purge, for example), or a series of samples are obtained to follow the course of a release. In any event, sample intervals are weekly, at a minimum.

Because HEPA filters are present between most source inputs to the stack and the sample point, releases of particulates normally are significantly less than pre-release calculations indicate. This provides for conservatism in establishing setpoints and in estimation of pre-release design basis quantity fraction. However, for the sake of maintaining accurate release totals, monitor results (for gases) and sample results (for particulates and iodines) utilized rather than the pre-release estimates, for cumulative records.

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Gamma analytical results for particulate and halogen filters are combined for determination of total activity of particulates and halogens released. Sampling and analysis will be performed per Appendix A, Table B-1 requirements.

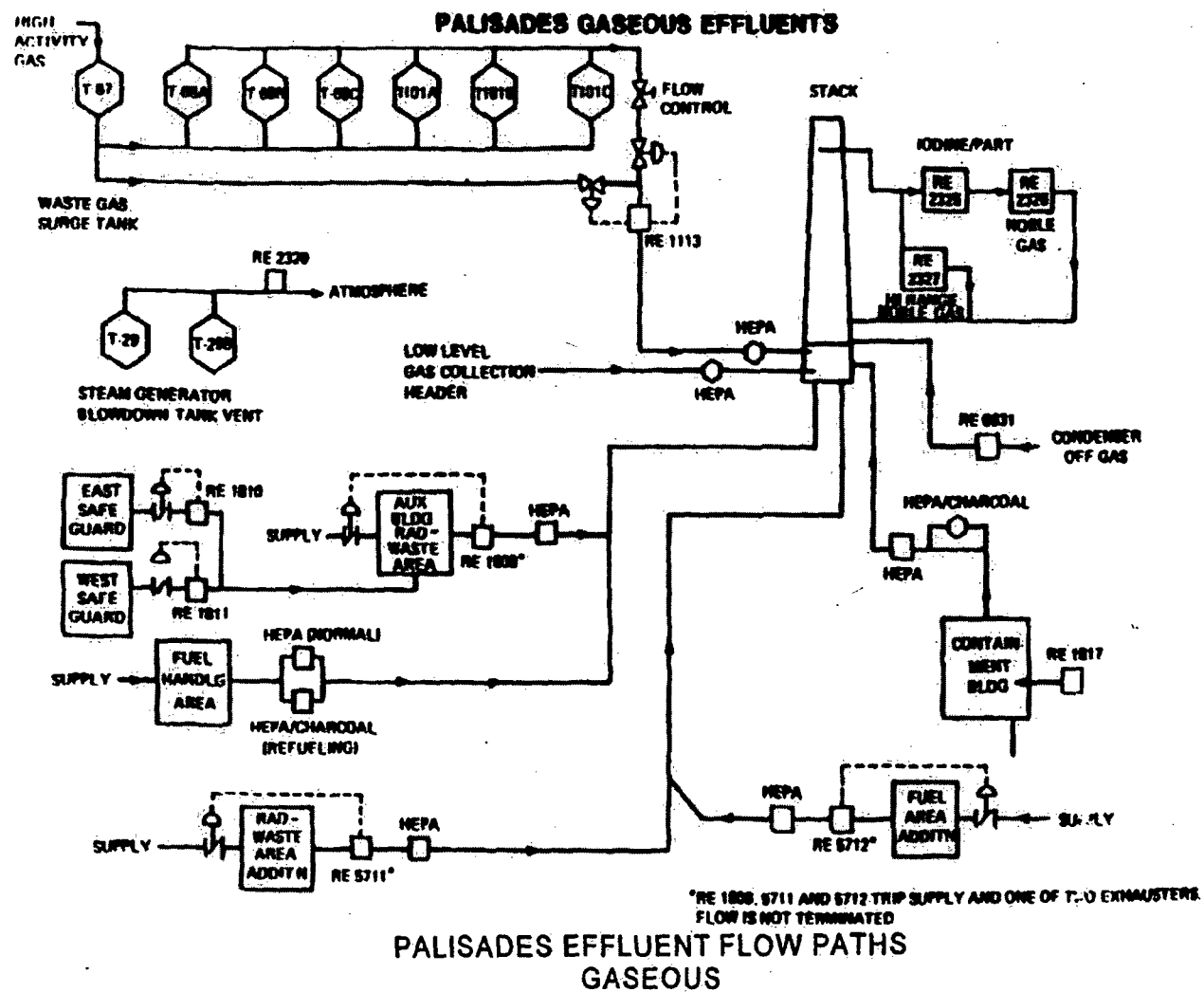
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H. NOBLE GAS SAMPLING

Noble gases will be sampled from Waste Gas Decay Tanks prior to release and the Containment prior to purging. Analysis of these samples will be used for accountability of noble gases. Off gas will be sampled at least weekly and used to calculate monthly noble gas releases. Nonroutine releases will be quantified from the stack noble gas monitor (RE 2326) which has a LLD of $1E-06 \mu\text{Ci/cc}$. Sampling and analysis will be performed per Appendix A, Table B-1 requirements.

I. TRITIUM SAMPLING

Tritium has a low dose consequence to the public because of low production rates. The major contributors to tritium effluents are evaporation from the fuel pool and reactor cavity (when flooded). Because of the low dose impact, gaseous tritium sampling will not be required. Tritium effluents will be estimated using conservative evaporation rate calculations from the fuel pool and reactor cavity.



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TABLE 1.1
PALISADES GASEOUS AND LIQUID SOURCE TERMS, CURIES/YEAR (1)

<u>Nuclide</u>	<u>Gaseous(2)</u>	<u>Liquid(2)</u>
H-3	5.5	159
Kr-85	4.1	NA
Kr-85m	0.12	NA
Kr-87	8.4E-02	NA
Kr-88	2.1E-01	NA
Ar-41	3.1E-02	NA
Xe-131m	2.2	NA
Xe-133	1493	NA
Xe-133m	0.43	NA
Xe-135	1.11	NA
Xe-135m	0.3	NA
I-131	0.025	3.21E-03
I-132	2.91E-03	NA
I-133	6.5E-03	4.7E-05
I-134	4.8E-04	NA
I-135	1.84E-02	NA
Na-24	1.5E-06	NA
Cr-51	2.5E-04	3.9E-03
Mn-54	4.1E-04	7.8E-03
Co-57	2.1E-06	3.2E-05
Co-58	8.6E-04	2.9E-02
Fe-59	6.6E-06	4.1E-04
Co-60	1.1E-03	1.24E-02
Se-75	3.7E-06	NA
Nb-95	2.4E-05	4.53E-04
Zr-95	4.7E-06	1.79E-04
Mo-99	1.5E-07	NA
Ru-103	0.3E-07	0.1E-05
Sb-127	NA	3.5E-05
Cs-134	4.5E-05	0.7
Cs-136	NA	1.8E-06
Cs-137	2.6E-04	1.36E-02
Ba-140	2.8E-07	NA
La-140	7.5E-07	1.1E-04
Unidentified beta	3.9E-04	3.3E-03

- (1) Data derived from taking the effluents released during July-December 1978 through January-June 1982 and dividing by 4.
- (2) Nuclide values listed as NA have not been observed at detectable levels in these waste streams.

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**TABLE 1.2
BASIC RADIONUCLIDE DATA**

	<u>NUCLIDE</u>	<u>HALF-LIFE</u> (days)	<u>LAMBDA</u> (1/s)	<u>BETA¹</u> (MEV/DIS)	<u>GAMMA¹</u> (MEV/DIS)
1	Tritium	4.49E 03	1.79E-09	5.68E-03	0.0
2	C-14	2.09E 06	3.84E-12	4.95E-02	0.0
3	N-13	6.94E-03	1.16E-03	4.91E-01	1.02E 00
4	O-19	3.36E-04	2.39E-02	1.02E 00	1.05E 00
5	F-18	7.62E-02	1.05E-04	2.50E-01	1.02E 00
6	NA-24	6.33E-01	1.27E-05	5.55E-01	4.12E 00
7	P-32	1.43E 01	5.61E-07	6.95E-01	0.0
8	AR-41	7.63E-02	1.05E-04	4.64E-01	1.28E 00
9	CR-51	2.78E 01	2.89E-07	3.86E-03	3.28E-02
10	MN-54	3.03E 02	2.65E-08	3.80E-03	8.36E-01
11	MN-56	1.07E-01	7.50E-05	8.29E-01	1.69E 00
12	FE-59	4.50E 01	1.78E-07	1.18E-01	1.19E 00
13	CO-58	7.13E 01	1.12E-07	3.41E-02	9.78E-01
14	CO-60	1.92E 03	4.18E-09	9.68E-02	2.50E 00
15	ZN-69m	5.75E-01	1.39E-05	2.21E-02	4.16E-01
16	ZN-69	3.96E-02	2.03E-04	3.19E-01	0.0
17	BR-84	2.21E-02	3.63E-04	1.28E 00	1.77E 00
18	BR-85	2.08E-03	3.86E-03	1.04E 00	6.60E-02
19	KR-85m	1.83E-01	4.38E-05	2.53E-01	1.59E-01
20	KR-85	3.93E 03	2.04E-09	2.51E-01	2.21E-03
21	KR-87	5.28E-02	1.52E-04	1.32E 00	7.93E-01
22	KR-88	1.17E-01	6.86E-05	3.61E-01	1.96E 00
23	KR-89	2.21E-03	3.63E-03	1.36E 00	1.83E 00
24	RB-88	1.24E-02	6.47E-04	2.06E 00	6.26E-01
25	RB-89	1.07E-02	7.50E-04	1.01E 00	2.05E-00
26	SR-89	5.20E 01	1.54E-07	5.83E-01	8.45E-05
27	SR-90	1.03E 04	7.79E-10	1.96E-01	0.0
28	SR-91	4.03E-01	1.99E-05	6.50E-01	6.95E-01
29	SR-92	1.13E-01	7.10E-05	1.95E-01	1.34E 00
30	SR-93	5.56E-03	1.44E-03	9.20E-01	2.24E 00
31	Y-90	2.67E 00	3.00E-06	9.36E-01	0.0
32	Y-91m	3.47E-02	2.31E-04	2.73E-02	5.30E-01
33	Y-91	5.88E 01	1.36E-07	6.06E-01	3.61E-03
34	Y-92	1.47E-01	5.46E-05	1.44E 00	2.50E-01
35	Y-93	4.29E-01	1.87E-05	1.17E 00	8.94E-02
36	ZR-95	6.50E 01	1.23E-07	1.16E-01	7.35E-01
37	NB-95m	3.75E 00	2.14E-06	1.81E-01	6.06E-02
38	NB-95	3.50E 01	2.29E-07	4.44E-02	7.64E-01
39	MO-99	2.79E 00	2.87E-06	3.96E-01	1.50E-01
40	TC-99m	2.50E-01	3.21E-05	1.56E-02	1.26E-01

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**TABLE 1.2 (continued)
BASIC RADIONUCLIDE DATA**

	<u>NUCLIDE</u>	<u>HALF-LIFE</u> <u>(days)</u>	<u>LAMBDA</u> <u>(1/s)</u>	<u>BETA¹</u> <u>(MEV/DIS)</u>	<u>GAMMA¹</u> <u>(MEV/DIS)</u>
41	TC-99	7.74E 07	1.04E-13	8.46E-02	0.0
42	TC-104	1.25E-02	6.42E-04	1.60E 00	1.95E 00
43	RU-106	3.67E 02	2.19E-08	1.01E-02	0.0
44	TE-132	3.24E 00	2.48E-06	1.00E-01	2.33E-01
45	I-129	6.21E 09	1.29E-15	5.43E-02	2.46E-02
46	I-131	8.05E 00	9.96E-07	1.94E-01	3.81E-01
47	I-132	9.58E-02	8.37E-05	4.89E-01	2.24E 00
48	I-133	8.75E-01	9.17E-06	4.08E-01	6.02E-01
49	I-134	3.61E-02	2.22E-04	6.16E-01	2.59E 00
50	I-135	2.79E-01	2.87E-05	3.68E-01	1.55E 00
51	XE-131m	1.18E 01	6.80E-07	1.43E-01	2.01E-02
52	XE-133m	2.26E 00	3.55E-06	1.90E-01	4.15E-02
53	XE-133	5.27E 00	1.52E-06	1.35E-01	4.60E-02
54	XE-135m	1.08E-02	7.43E-04	9.58E-02	4.32E-01
55	XE-135	3.83E-01	2.09E-05	3.17E-01	2.47E-01
56	XE-137	2.71E 03	2.96E-03	1.77E 00	1.88E-01
57	XE-138	9.84E-03	8.15E-04	6.65E-01	1.10E 00
58	CS-134	7.48E 02	1.07E-08	1.63E-01	1.55E 00
59	CS-135	1.10E 09	7.29E-15	5.63E-02	0.0
60	CS-136	1.30E 01	6.17E-07	1.37E-01	2.15E 00
61	CS-137	1.10E 04	7.29E-10	1.71E-01	5.97E-01
62	CS-138	2.24E-02	3.58E-04	1.20E 00	2.30E 00
63	BA-139	5.76E-02	1.39E-04	8.96E-01	3.53E-02
64	BA-140	1.28E 01	6.27E-07	3.15E-01	1.71E-01
65	LA-140	1.68E 00	4.77E-06	5.33E-01	2.31E 00
66	CE-144	2.84E 02	2.82E-08	9.13E-02	1.93E-02
67	PR-143	1.36E 01	5.90E-07	3.14E-01	0.0
68	PR-144	1.20E-02	6.68E-04	1.21E 00	3.18E 00

¹ Average energy per disintegration values were obtained from ICRP Publication No 38, Radionuclide Transformations: Energy and Intensity of Emissions 1983 and NUREG/CR-1413 (ORNL/NUREG-70), a Radionuclide Decay Data Base - Index and Summary Table, DC Kocher, May 1980.

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TABLE 1.3

USNRC COMPUTER CODE - XQQDOQ, VERSION 2.0 RUN DATE: 8 October 2008
***** PALISADES XQQDOQ82 ***** USING 01/01/2003 - 12/31/2007 MET DATA *****

GROUND LEVEL RELEASE - TOP OF CONTAINMENT BUILDING

TYPE OF LOCATION	DIRECTION FROM SITE	DISTANCE		X/Q			D/Q (PER SQ.METER)
		(MILES)	(METERS)	(SEC/CUB.METER)	(SEC/CUB.METER)	(SEC/CUB.METER)	
		NO DECAY			2.260 DAY DECAY	8.000 DAY DECAY	
				UNDEPLETED	DEPLETED		
SITE BOUNDARY	NNE	0.50	805.	1.47E-06	1.46E-06	1.34E-06	7.21E-09
SITE BOUNDARY	NE	0.65	1046.	1.10E-06	1.10E-06	9.90E-07	8.48E-09
SITE BOUNDARY	ENE	0.87	1400.	5.25E-07	5.23E-07	4.63E-07	4.11E-09
SITE BOUNDARY	E	0.82	1320.	5.72E-07	5.70E-07	5.07E-07	4.78E-09
SITE BOUNDARY	ESE	0.76	1223.	7.74E-07	7.72E-07	6.89E-07	7.46E-09
SITE BOUNDARY	SE	0.63	1014.	1.38E-06	1.38E-06	1.24E-06	1.30E-08
SITE BOUNDARY	SSE	0.48	772.	2.51E-06	2.50E-06	2.29E-06	2.11E-08
SITE BOUNDARY	S	0.42	676.	2.12E-06	2.12E-06	1.96E-06	1.06E-08
SITE BOUNDARY	SSW	0.48	772.	1.35E-06	1.34E-06	1.23E-06	6.10E-09
RESIDENCE	NNE	1.50	2414.	2.81E-07	2.79E-07	2.38E-07	1.13E-09
RESIDENCE	NE	1.50	2414.	3.17E-07	3.15E-07	2.69E-07	2.04E-09
RESIDENCE	ENE	1.20	1931.	3.25E-07	3.24E-07	2.81E-07	2.37E-09
RESIDENCE	E	1.70	2736.	1.93E-07	1.92E-07	1.62E-07	1.37E-09
RESIDENCE	ESE	0.99	1593.	5.18E-07	5.16E-07	4.53E-07	4.77E-09
RESIDENCE	SE	0.90	1448.	7.98E-07	7.95E-07	7.03E-07	7.14E-09
RESIDENCE	SSE	0.80	1287.	1.15E-06	1.14E-06	1.02E-06	9.09E-09
RESIDENCE	S	0.72	1159.	9.41E-07	9.36E-07	8.39E-07	4.39E-09
RESIDENCE	SSW	0.49	789.	1.30E-06	1.30E-06	1.19E-06	5.89E-09
GARDEN	NNE	1.70	2736.	2.36E-07	2.34E-07	1.98E-07	9.13E-10
GARDEN	NE	1.70	2736.	2.64E-07	2.62E-07	2.21E-07	1.64E-09
GARDEN	ENE	2.30	3701.	1.24E-07	1.23E-07	1.01E-07	7.67E-10
GARDEN	E	2.10	3380.	1.41E-07	1.40E-07	1.16E-07	9.48E-10
GARDEN	SE	1.49	2398.	3.77E-07	3.74E-07	3.20E-07	3.01E-09
GARDEN	S	4.20	6759.	7.55E-08	7.35E-08	5.72E-08	2.05E-10
BEEF CATTLE	SE	4.30	6920.	7.97E-08	7.80E-08	6.03E-08	4.65E-10

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TABLE 1.4

2008 PALISADES LAND USE CENSUS

Distance to the nearest residence, garden, dairy/beef cattle, and goat in each sector.

Sector	Residence	Garden	Beef Cattle	Dairy Cow	Goat
NNE	1.5	1.7	> 5 mi	> 5 mi	> 5 mi
NE	1.5	1.7	> 5 mi	> 5 mi	> 5 mi
ENE	1.2	2.3	> 5 mi	> 5 mi	> 5 mi
E	1.7	2.1	> 5 mi	> 5 mi	> 5 mi
ESE	0.99	> 5 mi	> 5 mi	> 5 mi	> 5 mi
SE	0.90	1.49	4.3	> 5 mi	> 5 mi
SSE	0.80	> 5 mi	> 5 mi	> 5 mi	> 5 mi
S	0.72	4.2	> 5 mi	> 5 mi	> 5 mi
SSW	0.49	> 5 mi	> 5 mi	> 5 mi	> 5 mi

TABLE 1.4a

2008 PALISADES LAND USE CENSUS

Critical Receptor Items

Sector	Distance (miles)	Item	X/Q (sec/m ³)	D/Q (1/m ²)
SSE	0.48	Site Boundary	2.51E-6	2.11E-8
SSW	0.49	Residence	1.30E-6	5.89E-9
SE	1.49	Garden	3.77E-7	3.01E-9
SE	4.3	Beef Cattle	7.97E-8	4.65E-10

*Based on Palisades 5-year composite meteorological data, 2003 - 2007.

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PALISADES NUCLEAR PLANT
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TABLE 1.5

DOSE FACTORS FOR SUBMERSION IN NOBLE GASES*

	<u>DFR¹</u>	<u>DFY²</u>	<u>DFS¹</u>	<u>DFB²</u>
Kr-85m	1.17(+3) ³	1.23(+3)	1.46(+3)	1.97(+3)
Kr-85	1.61(+1)	1.72(+1)	1.34(+3)	1.95(+3)
Kr-87	5.92(+3)	6.17(+3)	9.73(+3)	1.03(+4)
Kr-88	1.47(+4)	1.52(+4)	2.37(+3)	2.93(+3)
Kr-89	1.66(+4)	1.73(+4)	1.01(+4)	1.06(+4)
Xe-131m	9.15(+1)	1.56(+2)	4.76(+2)	1.11(+3)
Xe-133m	2.51(+2)	3.27(+2)	9.94(+2)	1.48(+3)
Xe-133	2.94(+2)	3.53(+2)	3.06(+2)	1.05(+3)
Xe-135m	3.12(+3)	3.36(+3)	7.11(+2)	7.39(+3)
Xe-135	1.81(+3)	1.92(+3)	1.86(+3)	2.46(+3)
Xe-137	1.42(+3)	1.51(+3)	1.22(+4)	1.27(+4)
Xe-138	8.83(+3)	9.21(+3)	4.13(+3)	4.75(+3)
Ar-41	8.84(+3)	9.30(+3)	2.69(+3)	3.28(+3)

1. mrem/y per $\mu\text{Ci}/\text{m}^3$
2. mrad/y per $\mu\text{Ci}/\text{m}^3$
3. $1.17(+3) = 1.17 \times 10^3$

*Dose factors for exposure to a semi-infinite cloud of noble gases. Values were obtained from USNRC Regulatory Guide 1.109, Revision 1 (October 1977).

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TABLE 1.6

STABLE ELEMENT TRANSFER DATA

<u>ELEMENT</u>	<u>F_m - MILK (COW) (DAYS/L)</u>	<u>F_m - MILK (GOAT) (DAYS/L)</u>	<u>F_f - MEAT (DAYS/KG)</u>	<u>B_{iv} (VEG/SOIL)</u>
H	1.0E-02	1.7E-01	1.2E-02	4.8E-00
C	1.2E-02	1.0E-01	3.1E-02	5.5E-00
Na	4.0E-02	4.0E-02	3.0E-02	5.2E-02
P	2.5E-02	2.5E-01	4.6E-02	1.1E-00
Cr	2.2E-03	2.2E-03	2.4E-03	2.5E-04
Mn	2.5E-04	2.5E-04	8.0E-04	2.9E-02
Fe	1.2E-03	1.3E-04	4.0E-02	6.6E-04
Co	1.0E-03	1.0E-03	1.3E-02	9.4E-03
Ni	6.7E-03	6.7E-03	5.3E-02	1.9E-02
Cu	1.4E-02	1.3E-02	8.0E-03	1.2E-01
Zn	3.9E-02	3.9E-02	3.0E-02	4.0E-01
Rb	3.0E-02	3.0E-02	3.1E-02	1.3E-01
Sr	8.0E-04	1.4E-02	6.0E-04	1.7E-02
Y	1.0E-05	1.0E-05	4.6E-03	2.6E-03
Zr	5.0E-06	5.0E-06	3.4E-02	1.7E-04
Nb	2.5E-03	2.5E-03	2.8E-01	9.4E-03
Mo	7.5E-03	7.5E-03	8.0E-03	1.2E-01
Tc	2.5E-02	2.5E-02	4.0E-01	2.5E-01
Ru	1.0E-06	1.0E-06	4.0E-01	5.0E-02
Rh	1.0E-02	1.0E-02	1.5E-03	1.3E+01
Ag	5.0E-02	5.0E-02	1.7E-02	1.5E-01
Te	1.0E-03	1.0E-03	7.7E-02	1.3E-00
I	6.0E-03	6.0E-02	2.9E-03	2.0E-02
Cs	1.2E-02	3.0E-01	4.0E-03	1.0E-02
Ba	4.0E-04	4.0E-04	3.2E-03	5.0E-03
La	5.0E-06	5.0E-06	2.0E-04	2.5E-03
Ce	1.0E-04	1.0E-04	1.2E-03	2.5E-03
Pr	5.0E-06	5.0E-06	4.7E-03	2.5E-03
Nd	5.0E-06	5.0E-06	3.3E-03	2.4E-03
W	5.0E-04	5.0E-04	1.3E-03	1.8E-02
Np	5.0E-06	5.0E-06	2.0E-04	2.5E-03

**PALISADES NUCLEAR PLANT
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TABLE 1.7

INFANT INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
H3*	0.	4.62E-07	4.62E-07	4.62E-07	4.62E-07	4.62E-07	4.62E-07
BE10	9.49E-04	1.25E-04	2.65E-05	0.	0.	1.49E-03	1.73E-05
C14	1.89E-05	3.79E-06	3.79E-06	3.79E-06	3.79E-06	3.79E-06	3.79E-06
N13	4.39E-08	4.39E-08	4.39E-08	4.39E-08	4.39E-08	4.39E-08	4.39E-08
F18	3.92E-06	0.	3.33E-07	0.	0.	0.	6.10E-07
NA22	7.37E-05	7.37E-05	7.37E-05	7.37E-05	7.37E-05	7.37E-05	7.37E-05
NA24	7.54E-06	7.54E-06	7.54E-06	7.54E-06	7.54E-06	7.54E-06	7.54E-06
P32	1.45E-03	8.03E-05	5.53E-05	0.	0.	0.	1.15E-05
AR39	0.	0.	0.	0.	0.	1.00E-08	0.
AR41	0.	0.	0.	0.	0.	3.14E-08	0.
CA41	7.48E-05	0.	8.16E-06	0.	0.	6.94E-02	2.96E-07
SC46	3.75E-04	5.41E-04	1.69E-04	0.	3.56E-04	0.	2.19E-05
CR51	0.	0.	6.39E-08	4.11E-08	9.45E-09	9.17E-06	2.55E-07
MN54	0.	1.81E-05	3.56E-06	0.	3.56E-06	7.14E-04	5.04E-06
MN56	0.	1.10E-09	1.58E-10	0.	7.86E-10	8.95E-06	5.12E-05
FE55	1.41E-05	8.39E-06	2.38E-06	0.	0.	6.21E-05	7.82E-07
FE59	9.69E-06	1.68E-05	6.77E-06	0.	0.	7.25E-04	1.77E-05
CO57	0.	4.65E-07	4.58E-07	0.	0.	2.71E-04	3.47E-06
CO58	0.	8.71E-07	1.30E-06	0.	0.	5.55E-04	7.95E-06
CO60	0.	5.73E-06	8.41E-06	0.	0.	3.22E-03	2.28E-05
NI59	1.81E-05	5.44E-06	3.10E-06	0.	0.	5.48E-05	6.34E-07
NI63	2.42E-04	1.46E-05	8.29E-06	0.	0.	1.49E-04	1.73E-06
NI65	1.71E-09	2.03E-10	8.79E-11	0.	0.	5.80E-06	3.58E-05
CU64	0.	1.34E-09	5.53E-10	0.	2.84E-09	6.64E-06	1.07E-05
ZN65	1.38E-05	4.47E-05	2.22E-05	0.	2.32E-05	4.62E-04	3.67E-05
ZN69M+D	8.98E-09	1.84E-08	1.67E-09	0.	7.45E-09	1.91E-05	2.92E-05
ZN69	3.85E-11	6.91E-11	5.13E-12	0.	2.87E-11	1.05E-06	9.44E-06
SE79	0.	2.25E-06	4.20E-07	0.	2.47E-06	2.99E-04	3.46E-06
BR82	0.	0.	9.49E-06	0.	0.	0.	0.
BR83+D	0.	0.	2.72E-07	0.	0.	0.	0.
BR84	0.	0.	2.86E-07	0.	0.	0.	0.
BR85	0.	0.	1.46E-08	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	2.50E-09	0.
KR85M	0.	0.	0.	0.	0.	1.31E-08	0.
KR85	0.	0.	0.	0.	0.	1.16E-08	0.
KR87	0.	0.	0.	0.	0.	6.59E-08	0.
KR88+D	0.	0.	0.	0.	0.	1.38E-07	0.
KR89	0.	0.	0.	0.	0.	8.67E-08	0.
RB86	0.	1.36E-04	6.30E-05	0.	0.	0.	2.17E-06
RB87	0.	7.11E-05	2.64E-05	0.	0.	0.	2.99E-07
RB88	0.	3.98E-07	2.05E-07	0.	0.	0.	2.42E-07
RB89+D	0.	2.29E-07	1.47E-07	0.	0.	0.	4.87E-08
SR89+D	2.84E-04	0.	8.15E-06	0.	0.	1.45E-03	4.57E-05
SR90+D	2.92E-02	0.	1.85E-03	0.	0.	8.03E-03	9.36E-05
SR91+D	6.83E-08	0.	2.47E-09	0.	0.	3.76E-05	5.24E-05
SR92+D	7.50E-09	0.	2.79E-10	0.	0.	1.70E-05	1.00E-04

Includes a 50% increase to account for percutaneous transpiration.

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TABLE 1.7 (continued)

INFANT INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	2.35E-06	0.	6.30E-08	0.	0.	1.92E-04	7.43E-05
Y91M+D	2.91E-10	0.	9.90E-12	0.	0.	1.99E-06	1.68E-06
Y91	4.20E-04	0.	1.12E-05	0.	0.	1.75E-03	5.02E-05
Y92	1.17E-08	0.	3.29E-10	0.	0.	1.75E-05	9.04E-05
Y93	1.07E-07	0.	2.91E-09	0.	0.	5.46E-05	1.19E-04
ZR93+D	2.24E-04	9.51E-05	6.18E-05	0.	3.19E-04	1.37E-03	1.48E-05
ZR95+D	8.24E-05	1.99E-05	1.45E-05	0.	2.22E-05	1.25E-03	1.55E-05
ZR97+D	1.07E-07	1.83E-08	8.36E-09	0.	1.85E-08	7.88E-05	1.00E-04
NB93M	1.38E-04	3.59E-05	1.15E-05	0.	3.68E-05	2.09E-04	2.47E-06
NB95	1.12E-05	4.59E-06	2.70E-06	0.	3.37E-06	3.42E-04	9.05E-06
NB97	2.44E-10	5.21E-11	1.88E-11	0.	4.07E-11	2.37E-06	1.92E-05
MO93	0.	6.46E-06	2.22E-07	0.	1.54E-06	3.40E-04	3.76E-06
MO99+D	0.	1.18E-07	2.31E-08	0.	1.89E-07	9.63E-05	3.48E-05
TC99M	9.98E-13	2.06E-12	2.66E-11	0.	2.22E-11	5.79E-07	1.45E-06
TC99	2.09E-07	2.68E-07	8.85E-08	0.	2.49E-06	6.77E-04	7.82E-06
TC101	4.65E-14	5.88E-14	5.80E-13	0.	6.99E-13	4.17E-07	6.03E-07
RU103+D	1.44E-06	0.	4.85E-07	0.	3.03E-06	3.94E-04	1.15E-05
RU105+D	8.74E-10	0.	2.93E-10	0.	6.42E-10	1.12E-05	3.46E-05
RU106+D	6.20E-05	0.	7.77E-06	0.	7.61E-05	8.26E-03	1.17E-04
RH105	8.26E-09	5.41E-09	3.63E-09	0.	1.50E-08	2.08E-05	1.37E-05
PD107	0.	4.92E-07	4.11E-08	0.	2.75E-06	6.34E-05	7.33E-07
PD109	0.	3.92E-09	1.05E-09	0.	1.28E-08	1.68E-05	2.85E-05
AG110M+D	7.13E-06	5.16E-06	3.57E-06	0.	7.80E-06	2.62E-03	2.36E-05
AG111	3.75E-07	1.45E-07	7.75E-08	0.	3.05E-07	2.06E-04	3.02E-05
CD113M	0.	6.67E-04	2.64E-05	0.	5.80E-04	1.40E-03	1.65E-05
CD115M	0.	1.73E-04	6.19E-06	0.	9.41E-05	1.47E-03	5.02E-05
SN123	2.09E-04	4.21E-06	7.28E-06	4.27E-06	0.	2.22E-03	4.08E-05
SN125+D	1.01E-05	2.51E-07	6.00E-07	2.47E-07	0.	6.43E-04	7.26E-05
SN126+D	8.30E-04	1.44E-05	3.52E-05	3.84E-06	0.	4.93E-03	1.65E-05
SB124	2.71E-05	3.97E-07	8.56E-06	7.18E-08	0.	1.89E-03	4.22E-05
SB125+D	3.69E-05	3.41E-07	7.78E-06	4.45E-08	0.	1.17E-03	1.05E-05
SB126	3.08E-06	6.01E-08	1.11E-06	2.35E-08	0.	6.88E-04	5.33E-05
SB127	2.82E-07	5.04E-09	8.76E-08	3.60E-09	0.	1.54E-04	3.78E-05
TE125M	3.40E-06	1.42E-06	4.70E-07	1.16E-06	0.	3.19E-04	9.22E-06
TE127M+D	1.19E-05	4.93E-06	1.48E-06	3.48E-06	2.68E-05	9.37E-04	1.95E-05
TE127	1.59E-09	6.81E-10	3.49E-10	1.32E-09	3.47E-09	7.39E-06	1.74E-05
TE129M+D	1.01E-05	4.35E-06	1.59E-06	3.91E-06	2.27E-05	1.20E-03	4.93E-05
TE129	5.63E-11	2.48E-11	1.34E-11	4.82E-11	1.25E-10	2.14E-06	1.88E-05
TE131M+D	7.62E-08	3.93E-08	2.59E-08	6.38E-08	1.89E-07	1.42E-04	8.51E-05
TE131+D	1.24E-11	5.87E-12	3.57E-12	1.13E-11	2.85E-11	1.47E-06	5.87E-06
TE132+D	2.66E-07	1.69E-07	1.26E-07	1.99E-07	7.39E-07	2.43E-04	3.15E-05
TE133M+D	6.13E-11	3.59E-11	2.74E-11	5.52E-11	1.72E-10	3.92E-06	1.59E-05
TE134+D	3.18E-11	2.04E-11	1.68E-11	2.91E-11	9.59E-11	2.93E-06	2.53E-06
I129	2.16E-05	1.59E-05	1.16E-05	1.04E-02	1.88E-05	0.	2.12E-07
I130	4.54E-06	9.91E-06	3.98E-06	1.14E-03	1.09E-05	0.	1.42E-06
I131+D	2.71E-05	3.17E-05	1.40E-05	1.06E-02	3.70E-05	0.	7.56E-07

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TABLE 1.7 (continued)

INFANT INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
I132	1.21E-06	2.53E-06	8.99E-07	1.21E-04	2.82E-06	0.	1.36E-06
I133+D	9.46E-06	1.37E-05	4.00E-06	2.54E-03	1.60E-05	0.	1.54E-06
I134	6.58E-07	1.34E-06	4.75E-07	3.18E-05	1.49E-06	0.	9.21E-07
I135+D	2.76E-06	5.43E-06	1.98E-06	4.97E-04	6.05E-06	0.	1.31E-06
XE131M	0.	0.	0.	0.	0.	6.77E-09	0.
XE133M	0.	0.	0.	0.	0.	8.89E-09	0.
XE133	0.	0.	0.	0.	0.	7.41E-09	0.
XE135M	0.	0.	0.	0.	0.	8.05E-09	0.
XE135	0.	0.	0.	0.	0.	1.80E-08	0.
XE137	0.	0.	0.	0.	0.	8.30E-08	0.
XE138+D	0.	0.	0.	0.	0.	9.78E-08	0.
CS134M+D	1.32E-07	2.10E-07	1.11E-07	0.	8.50E-08	2.00E-08	1.16E-07
CS134	2.83E-04	5.02E-04	5.32E-05	0.	1.36E-04	5.69E-05	9.53E-07
CS135	1.00E-04	8.66E-05	4.73E-06	0.	2.58E-05	1.01E-05	2.18E-07
CS136	3.45E-05	9.61E-05	3.78E-05	0.	4.03E-05	8.40E-06	1.02E-06
CS137+D	3.92E-04	4.37E-04	3.25E-05	0.	1.23E-04	5.09E-05	9.53E-07
CS138	3.61E-07	5.58E-07	2.84E-07	0.	2.93E-07	4.67E-08	6.26E-07
CS139+D	2.32E-07	3.03E-07	1.22E-07	0.	1.65E-07	2.53E-08	1.33E-08
BA139	1.06E-09	7.03E-13	3.07E-11	0.	4.23E-13	4.25E-06	3.64E-05
BA140+D	4.00E-05	4.00E-08	2.07E-06	0.	9.59E-09	1.14E-03	2.74E-05
BA141+D	1.12E-10	7.70E-14	3.55E-12	0.	4.64E-14	2.12E-06	3.39E-06
BA142+D	2.84E-11	2.36E-14	1.40E-12	0.	1.36E-14	1.11E-06	4.95E-07
LA140	3.61E-07	1.43E-07	3.68E-08	0.	0.	1.20E-04	6.06E-05
LA141	4.85E-09	1.40E-09	2.45E-10	0.	0.	1.22E-05	5.96E-05
LA142	7.36E-10	2.69E-10	6.46E-11	0.	0.	5.87E-06	4.25E-05
CE141	1.98E-05	1.19E-05	1.42E-06	0.	3.75E-06	3.69E-04	1.54E-05
CE143+D	2.09E-07	1.38E-07	1.58E-08	0.	4.03E-08	8.30E-05	3.55E-05
CE144+D	2.28E-03	8.65E-04	1.26E-04	0.	3.84E-04	7.03E-03	1.06E-04
PR143	1.00E-05	3.74E-06	4.99E-07	0.	1.41E-06	3.09E-04	2.66E-05
PR144	3.42E-11	1.32E-11	1.72E-12	0.	4.80E-12	1.15E-06	3.06E-06
ND147+D	5.67E-06	5.81E-06	3.57E-07	0.	2.25E-06	2.30E-04	2.23E-05
PM147	3.91E-04	3.07E-05	1.56E-05	0.	4.93E-05	4.55E-04	5.75E-06
PM148M+D	5.00E-05	1.24E-05	9.94E-06	0.	1.45E-05	1.22E-03	3.37E-05
PM148	3.34E-06	4.82E-07	2.44E-07	0.	5.76E-07	3.20E-04	6.04E-05
PM149	3.10E-07	4.08E-08	1.78E-08	0.	4.96E-08	6.50E-05	3.01E-05
PM151	7.52E-08	1.10E-08	5.55E-09	0.	1.30E-08	3.25E-05	2.58E-05
SM151	3.38E-04	6.45E-05	1.63E-05	0.	5.24E-05	2.98E-04	3.46E-06
SM153	1.53E-07	1.18E-07	9.06E-09	0.	2.47E-08	3.70E-05	1.93E-05
EU152	7.83E-04	1.77E-04	1.72E-04	0.	5.94E-04	1.48E-03	9.88E-06
EU154	2.96E-03	3.46E-04	2.45E-04	0.	1.14E-03	3.05E-03	2.84E-05
EU155	5.97E-04	5.72E-05	3.46E-05	0.	1.58E-04	5.20E-04	5.19E-05
EU156	1.56E-05	9.59E-06	1.54E-06	0.	4.48E-06	6.12E-04	4.14E-05
TB160	1.12E-04	0.	1.40E-05	0.	3.20E-05	1.11E-03	2.14E-05
HO166M	1.45E-03	3.07E-04	2.51E-04	0.	4.22E-04	2.05E-03	1.65E-05
W181	4.86E-08	1.46E-08	1.67E-09	0.	0.	1.33E-05	2.63E-07
W185	1.57E-06	4.83E-07	5.58E-08	0.	0.	4.48E-04	1.12E-05
W187	9.26E-09	6.44E-09	2.23E-09	0.	0.	2.83E-05	2.54E-05

**PALISADES NUCLEAR PLANT
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Revision 21

TABLE 1.7 (continued)

INFANT INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	8.62E-02	2.02E-02	3.43E-03	0.	6.85E-02	1.76E-01	3.79E-05
BI210+D	0.	1.33E-05	1.18E-06	0.	1.03E-04	9.96E-03	3.27E-05
PO210	2.98E-03	5.63E-03	7.12E-04	0.	1.30E-02	2.40E-01	4.36E-05
RN222+D	0.	0.	0.	0.	0.	9.88E-06	0.
RA223+D	1.56E-03	2.26E-06	3.12E-04	0.	4.16E-05	2.25E-01	3.04E-04
RA224+D	1.77E-04	4.00E-07	3.54E-05	0.	7.30E-06	7.91E-02	3.42E-04
RA225+D	2.57E-03	2.88E-06	5.13E-04	0.	5.31E-05	2.57E-01	2.87E-04
RA226+D	2.48E-01	1.46E-05	2.05E-01	0.	2.94E-04	7.83E-01	3.05E-04
RA228+D	1.60E-01	7.61E-06	1.80E-01	0.	1.53E-04	1.09E-00	5.19E-05
AC225	3.69E-03	4.72E-03	2.48E-04	0.	3.49E-04	1.96E-01	2.71E-04
AC227+D	5.29E+00	8.76E-01	3.28E-01	0.	1.86E-01	1.62E+00	5.27E-05
TH227+D	1.82E-03	3.03E-05	5.24E-05	0.	1.13E-04	3.27E-01	3.53E-04
TH228+D	8.46E-01	1.10E-02	2.86E-02	0.	5.61E-02	4.65E+00	3.62E-04
TH229	1.34E+01	1.82E-01	6.62E-01	0.	8.99E-01	1.22E+01	3.29E-04
TH230	3.46E+00	1.79E-01	9.65E-02	0.	8.82E-01	2.18E+00	3.87E-05
TH232+D	3.86E+00	1.53E-01	2.29E-01	0.	7.54E-01	2.09E+00	3.29E-05
TH234	1.33E-05	7.17E-07	3.84E-07	0.	2.70E-06	1.62E-03	7.40E-05
PA231+D	9.10E+00	3.00E-01	3.62E-01	0.	1.62E+00	3.85E-01	4.61E-05
PA233	6.84E-06	1.32E-06	1.19E-06	0.	3.68E-06	2.19E-04	9.04E-06
U232+D	2.57E-01	0.	2.13E-02	0.	2.40E-02	1.49E+00	4.36E-05
U233+D	5.44E-02	0.	3.83E-03	0.	1.09E-02	3.56E-01	4.03E-05
U234	5.22E-02	0.	3.75E-03	0.	1.07E-02	3.49E-01	3.95E-05
U235+D	5.01E-02	0.	3.52E-03	0.	1.01E-02	3.28E-01	5.02E-05
U236	5.01E-02	0.	3.60E-03	0.	1.03E-02	3.35E-01	3.71E-05
U237	3.25E-07	0.	8.65E-08	0.	8.08E-07	9.13E-05	1.31E-05
U238+D	4.79E-02	0.	3.29E-03	0.	9.40E-03	3.06E-01	3.54E-05
NP237+D	3.03E+00	2.32E-01	1.26E-01	0.	7.69E-01	3.49E-01	5.10E-05
NP238	2.67E-06	6.73E-08	4.16E-08	0.	1.47E-07	9.19E-05	2.58E-05
NP239	2.65E-07	2.37E-08	1.34E-08	0.	4.73E-08	4.25E-05	1.78E-05
PU238	5.02E+00	6.33E-01	1.27E-01	0.	4.64E-01	9.03E-01	4.69E-05
PU239	5.50E+00	6.72E-01	1.34E-01	0.	4.95E-01	8.47E-01	4.28E-05
PU240	6.49E+00	6.71E-01	1.34E-01	0.	4.94E-01	8.47E-01	4.36E-05
PU241+D	1.55E-01	6.69E-03	3.11E-03	0.	1.15E-02	7.62E-04	8.97E-07
PU242	5.09E+00	6.47E-01	1.29E-01	0.	4.77E-01	8.15E-01	4.20E-05
PU244	5.95E+00	7.40E-01	1.48E-01	0.	5.46E-01	9.33E-01	6.26E-05
AM241	1.84E+00	8.44E-01	1.31E-01	0.	7.94E-01	4.06E-01	4.78E-05
AM242M	1.90E+00	8.24E-01	1.35E-01	0.	8.03E-01	1.64E-01	6.01E-05
AM243	1.82E+00	8.10E-01	1.27E-01	0.	7.72E-01	3.85E-01	5.60E-05
CM242	8.58E-02	7.44E-02	5.70E-03	0.	1.69E-02	2.97E-01	5.10E-05
CM243	1.73E+00	7.94E-01	1.06E-01	0.	3.91E-01	4.24E-01	5.02E-05
CM244	1.43E+00	7.04E-01	8.89E-02	0.	3.21E-01	4.08E-01	4.86E-05
CM245	2.26E+00	8.80E-01	1.36E-01	0.	5.23E-01	3.92E-01	4.53E-05
CM246	2.24E+00	8.79E-01	1.36E-01	0.	5.23E-01	3.99E-01	4.45E-05
CM247+D	2.18E+00	8.64E-01	1.33E-01	0.	5.15E-01	3.92E-01	5.85E-05
CM248	1.82E+01	7.12E+00	1.10E+00	0.	4.24E+00	3.23E+00	9.43E-04
CF252	4.26E+00	0.	1.01E-01	0.	0.	1.37E+00	1.85E-04

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TABLE 1.7 (continued)

CHILD INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
H3*	0.	3.04E-07	3.04E-07	3.04E-07	3.04E-07	3.04E-07	3.04E-07
BE10	8.43E-04	9.83E-05	2.12E-05	0.	0.	7.41E-04	1.72E-05
C14	9.70E-06	1.82E-06	1.82E-06	1.82E-06	1.82E-06	1.82E-06	1.82E-06
N13	2.33E-08	2.33E-08	2.33E-08	2.33E-08	2.33E-08	2.33E-08	2.33E-08
F18	1.88E-06	0.	1.85E-07	0.	0.	0.	3.37E-07
NA22	4.41E-05	4.41E-05	4.41E-05	4.41E-05	4.41E-05	4.41E-05	4.41E-05
NA24	4.35E-06	4.35E-06	4.35E-06	4.35E-06	4.35E-06	4.35E-06	4.35E-06
P32	7.04E-04	3.09E-05	2.67E-05	0.	0.	0.	1.14E-05
AR39	0.	0.	0.	0.	0.	4.89E-09	0.
AR41	0.	0.	0.	0.	0.	1.68E-08	0.
CA41	7.06E-05	0.	7.70E-06	0.	0.	7.21E-02	2.94E-07
SC46	1.97E-04	2.70E-04	1.04E-04	0.	2.39E-04	0.	2.45E-05
CR51	0.	0.	4.17E-08	2.31E-08	6.57E-09	4.59E-06	2.93E-07
MN54	0.	1.16E-05	2.57E-06	0.	2.71E-06	4.26E-04	6.19E-06
MN56	0.	4.48E-10	8.43E-11	0.	4.52E-10	3.55E-06	3.33E-05
FE55	1.28E-05	6.80E-06	2.10E-06	0.	0.	3.00E-05	7.75E-07
FE59	5.59E-06	9.04E-06	4.51E-06	0.	0.	3.43E-04	1.91E-05
CO57	0.	2.44E-07	2.88E-07	0.	0.	1.37E-04	3.58E-06
CO58	0.	4.79E-07	8.55E-07	0.	0.	2.99E-04	9.29E-06
CO60	0.	3.55E-06	6.12E-06	0.	0.	1.91E-03	2.60E-05
NI59	1.66E-05	4.67E-06	2.83E-06	0.	0.	2.73E-05	6.29E-07
NI63	2.22E-04	1.25E-05	7.56E-06	0.	0.	7.43E-05	1.71E-06
NI65	8.08E-10	7.99E-11	4.44E-11	0.	0.	2.21E-06	2.27E-05
CU64	0.	5.39E-10	2.90E-10	0.	1.63E-09	2.59E-06	9.92E-06
ZN65	1.15E-05	3.06E-05	1.90E-05	0.	1.93E-05	2.69E-04	4.41E-06
ZN69M+D	4.26E-09	7.28E-09	8.59E-10	0.	4.22E-09	7.36E-06	2.71E-05
ZN69	1.81E-11	2.61E-11	2.41E-12	0.	1.58E-11	3.84E-07	2.75E-06
SE79	0.	1.23E-06	2.60E-07	0.	1.71E-06	1.49E-04	3.43E-06
BR82	0.	0.	5.66E-06	0.	0.	0.	0.
BR83+D	0.	0.	1.28E-07	0.	0.	0.	0.
BR84	0.	0.	1.48E-07	0.	0.	0.	0.
BR85	0.	0.	6.84E-09	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	1.22E-09	0.
KR85M	0.	0.	0.	0.	0.	6.58E-09	0.
KR85	0.	0.	0.	0.	0.	5.66E-09	0.
KR87	0.	0.	0.	0.	0.	3.38E-08	0.
KR88+D	0.	0.	0.	0.	0.	6.99E-08	0.
KR89	0.	0.	0.	0.	0.	4.55E-08	0.
RB86	0.	5.36E-05	3.09E-05	0.	0.	0.	2.16E-06
RB87	0.	3.16E-05	1.37E-05	0.	0.	0.	2.96E-07
RB88	0.	1.52E-07	9.90E-08	0.	0.	0.	4.66E-09
RB89+D	0.	9.33E-08	7.83E-08	0.	0.	0.	5.11E-10
SR89+D	1.62E-04	0.	4.66E-06	0.	0.	5.83E-04	4.52E-05
SR90+D	2.73E-02	0.	1.74E-03	0.	0.	3.99E-03	9.28E-05
SR91+D	3.28E-08	0.	1.24E-09	0.	0.	1.44E-05	4.70E-05
SR92+D	3.54E-09	0.	1.42E-10	0.	0.	6.49E-06	6.55E-05

*Includes a 50% increase to account for percutaneous transpiration.

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TABLE 1.7 (continued)

CHILD INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	1.11E-06	0.	2.99E-08	0.	0.	7.07E-05	7.24E-05
Y91M+D	1.37E-10	0.	4.98E-12	0.	0.	7.60E-07	4.64E-07
Y91	2.47E-04	0.	6.59E-06	0.	0.	7.10E-04	4.97E-05
Y92	5.50E-09	0.	1.57E-10	0.	0.	6.46E-06	6.46E-05
Y93	5.04E-08	0.	1.38E-09	0.	0.	2.01E-05	1.05E-04
ZR93+D	2.07E-04	7.80E-05	5.55E-05	0.	3.00E-04	7.10E-04	1.47E-05
ZR95+D	5.13E-05	1.13E-05	1.00E-05	0.	1.61E-05	6.03E-04	1.65E-05
ZR97+D	5.07E-08	7.34E-09	4.32E-09	0.	1.05E-08	3.06E-05	9.49E-05
NB93M	1.27E-04	3.17E-05	1.04E-05	0.	3.44E-05	1.04E-04	2.45E-06
NB95	6.35E-06	2.48E-06	1.77E-06	0.	2.33E-06	1.66E-04	1.00E-05
NB97	1.16E-10	2.08E-11	9.74E-12	0.	2.31E-11	9.23E-07	7.52E-06
MO93	0.	3.76E-06	1.35E-07	0.	1.06E-06	1.70E-04	3.78E-06
MO99+D	0.	4.66E-08	1.15E-08	0.	1.06E-07	3.66E-05	3.42E-05
TC99M	4.81E-13	9.41E-13	1.56E-11	0.	1.37E-11	2.57E-07	1.30E-06
TC99	1.34E-07	1.49E-07	5.35E-08	0.	1.75E-06	3.37E-04	7.75E-06
TC101	2.19E-14	2.30E-14	2.91E-13	0.	3.92E-13	1.58E-07	4.41E-09
RU103+D	7.55E-07	0.	2.90E-07	0.	1.90E-06	1.79E-04	1.21E-05
RU105+D	4.13E-10	0.	1.50E-10	0.	3.63E-10	4.30E-06	2.69E-05
RU106+D	3.68E-05	0.	4.57E-06	0.	4.97E-05	3.87E-03	1.16E-04
RH105	3.91E-09	2.10E-09	1.79E-09	0.	8.39E-09	7.82E-06	1.33E-05
PD107	0.	2.65E-07	2.51E-08	0.	1.97E-06	3.16E-05	7.26E-07
PD109	0.	1.48E-09	4.95E-10	0.	7.06E-09	6.16E-06	2.59E-05
AG110M+D	4.56E-06	3.08E-06	2.47E-06	0.	5.74E-06	1.48E-03	2.71E-05
AG111	1.81E-07	5.68E-08	3.75E-08	0.	1.71E-07	7.73E-05	2.98E-05
CD113M	0.	4.93E-04	2.12E-05	0.	5.13E-04	6.94E-04	1.63E-05
CD115M	0.	7.88E-05	3.39E-06	0.	5.93E-05	5.86E-04	4.97E-05
SN123	1.29E-04	2.14E-06	4.19E-06	2.27E-06	0.	9.59E-04	4.05E-05
SN125+D	4.95E-06	9.94E-08	2.95E-07	1.03E-07	0.	2.43E-04	7.17E-05
SN126+D	6.23E-04	1.04E-05	2.36E-05	2.84E-06	0.	3.02E-03	1.63E-05
SB124	1.55E-05	2.00E-07	5.41E-06	3.41E-08	0.	8.76E-04	4.43E-05
SB125+D	2.66E-05	2.05E-07	5.59E-06	2.46E-08	0.	6.27E-04	1.09E-05
SB126	1.72E-06	2.62E-08	6.16E-07	1.00E-08	0.	2.86E-04	5.67E-05
SB127	1.36E-07	2.09E-09	4.70E-08	1.51E-09	0.	6.17E-05	3.82E-05
TE125M	1.82E-06	6.29E-07	2.47E-07	5.20E-07	0.	1.29E-04	9.13E-06
TE127M+D	6.72E-06	2.31E-06	8.16E-07	1.64E-06	1.72E-05	4.00E-04	1.93E-05
TE127	7.49E-10	2.57E-10	1.65E-10	5.30E-10	1.91E-09	2.71E-06	1.52E-05
TE129M+D	5.19E-06	1.85E-06	8.22E-07	1.71E-06	1.36E-05	4.76E-04	4.91E-05
TE129	2.64E-11	9.45E-12	6.44E-12	1.93E-11	6.94E-11	7.93E-07	6.89E-06
TE131M+D	3.63E-08	1.60E-08	1.37E-08	2.64E-08	1.08E-07	5.56E-05	8.32E-05
TE131+D	5.87E-12	2.28E-12	1.78E-12	4.59E-12	1.59E-11	5.55E-07	3.60E-07
TE132+D	1.30E-07	7.36E-08	7.12E-08	8.58E-08	4.79E-07	1.02E-04	3.72E-05
TE133M+D	2.93E-11	1.51E-11	1.50E-11	2.32E-11	1.01E-10	1.60E-06	4.77E-06
TE134+D	1.53E-11	8.81E-12	9.40E-12	1.24E-11	5.71E-11	1.23E-06	4.87E-07
I129	1.05E-05	6.40E-06	5.71E-06	4.28E-03	1.08E-05	0.	2.15E-07
I130	2.21E-06	4.43E-06	2.28E-06	4.99E-04	6.61E-06	0.	1.38E-06
I131+D	1.30E-05	1.30E-05	7.37E-06	4.39E-03	2.13E-05	0.	7.68E-07

**PALISADES NUCLEAR PLANT
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Revision 21

TABLE 1.7 (continued)

CHILD INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
I132	5.72E-07	1.10E-06	5.07E-07	5.23E-05	1.69E-06	0.	8.65E-07
I133+D	4.48E-06	5.49E-06	2.08E-06	1.04E-03	9.13E-06	0.	1.48E-06
I134	3.17E-07	5.84E-07	2.69E-07	1.37E-05	8.92E-07	0.	2.58E-07
I135+D	1.33E-06	2.36E-06	1.12E-06	2.14E-04	3.62E-06	0.	1.20E-06
XE131M	0.	0.	0.	0.	0.	3.30E-09	0.
XE133M	0.	0.	0.	0.	0.	4.36E-09	0.
XE133	0.	0.	0.	0.	0.	3.66E-09	0.
XE135M	0.	0.	0.	0.	0.	4.48E-09	0.
XE135	0.	0.	0.	0.	0.	9.09E-09	0.
XE137	0.	0.	0.	0.	0.	4.07E-08	0.
XE138+D	0.	0.	0.	0.	0.	5.17E-08	0.
CS134M+D	6.33E-08	8.92E-08	6.12E-08	0.	4.94E-08	8.35E-09	7.92E-08
CS134	1.76E-04	2.74E-04	6.07E-05	0.	8.93E-05	3.27E-05	1.04E-06
CS135	6.23E-05	4.13E-05	4.45E-06	0.	1.53E-05	5.22E-06	2.17E-07
CS136	1.76E-05	4.62E-05	3.14E-05	0.	2.58E-05	3.93E-06	1.13E-06
CS137+D	2.45E-04	2.23E-04	3.47E-05	0.	7.63E-05	2.81E-05	9.78E-07
CS138	1.71E-07	2.27E-07	1.50E-07	0.	1.68E-07	1.84E-08	7.29E-08
CS139+D	1.09E-07	1.15E-07	5.80E-08	0.	9.08E-08	9.36E-09	7.23E-12
BA139	4.98E-10	2.66E-13	1.45E-11	0.	2.33E-13	1.56E-06	1.56E-05
BA140+D	2.00E-05	1.75E-08	1.17E-06	0.	5.71E-09	4.71E-04	2.75E-05
BA141+D	5.29E-11	2.95E-14	1.72E-12	0.	2.56E-14	7.89E-07	7.44E-08
BA142+D	1.35E-11	9.73E-15	7.54E-13	0.	7.87E-15	4.44E-07	7.41E-10
LA140	1.74E-07	6.08E-08	2.04E-08	0.	0.	4.94E-05	6.10E-05
LA141	2.28E-09	5.31E-10	1.15E-10	0.	0.	4.48E-06	4.37E-05
LA142	3.50E-10	1.11E-10	3.49E-11	0.	0.	2.35E-06	2.05E-05
CE141	1.06E-05	5.28E-06	7.83E-07	0.	2.31E-06	1.47E-04	1.53E-05
CE143+D	9.89E-08	5.37E-08	7.77E-09	0.	2.26E-08	3.12E-05	3.44E-05
CE144+D	1.83E-03	5.72E-04	9.77E-05	0.	3.17E-04	3.23E-03	1.05E-04
PR143	4.99E-06	1.50E-06	2.47E-07	0.	8.11E-07	1.17E-04	2.63E-05
PR144	1.61E-11	4.99E-12	8.10E-13	0.	2.64E-12	4.23E-07	5.32E-08
ND147+D	2.92E-06	2.36E-06	1.84E-07	0.	1.30E-06	8.87E-05	2.22E-05
PM147	3.52E-04	2.52E-05	1.36E-05	0.	4.45E-05	2.20E-04	5.70E-06
PM148M+D	3.31E-05	6.55E-06	6.55E-06	0.	9.74E-06	5.72E-04	3.58E-05
PM148	1.61E-06	1.94E-07	1.25E-07	0.	3.30E-07	1.24E-04	6.01E-05
PM149	1.47E-07	1.56E-08	8.45E-09	0.	2.75E-08	2.40E-05	2.92E-05
PM151	3.57E-08	4.33E-09	2.82E-09	0.	7.35E-09	1.24E-05	2.50E-05
SM151	3.14E-04	4.75E-05	1.49E-05	0.	4.89E-05	1.48E-04	3.43E-06
SM153	7.24E-08	4.51E-08	4.35E-09	0.	1.37E-08	1.37E-05	1.87E-05
EU152	7.42E-04	1.37E-04	1.61E-04	0.	5.73E-04	9.00E-04	1.14E-05
EU154	2.74E-03	2.49E-04	2.27E-04	0.	1.09E-03	1.66E-03	2.98E-05
EU155	5.60E-04	4.05E-05	3.18E-05	0.	1.51E-04	2.79E-04	5.39E-05
EU156	7.89E-06	4.23E-06	8.75E-07	0.	2.72E-06	2.54E-04	4.24E-05
TB160	7.79E-05	0.	9.67E-06	0.	2.32E-05	5.34E-04	2.28E-05
HO166M	1.34E-03	2.81E-04	2.37E-04	0.	4.01E-04	1.13E-03	1.63E-05
W181	2.66E-08	6.52E-09	8.99E-10	0.	0.	5.71E-06	2.61E-07
W185	8.31E-07	2.08E-07	2.91E-08	0.	0.	1.86E-04	1.11E-05
W187	4.41E-09	2.61E-09	1.17E-09	0.	0.	1.11E-05	2.46E-05

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Revision 21

TABLE 1.7 (continued)

CHILD INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	8.03E-02	1.85E-02	3.18E-03	0.	6.31E-02	8.74E-02	3.75E-05
BI210+D	0.	5.11E-06	5.65E-07	0.	5.76E-05	3.70E-03	3.21E-05
PO210	1.70E-03	2.76E-03	4.09E-04	0.	8.85E-03	1.05E-01	4.32E-05
RN222+D	0.	0.	0.	0.	0.	4.82E-06	0.
RA223+D	7.69E-04	8.89E-07	1.54E-04	0.	2.36E-05	8.48E-02	3.00E-04
RA224+D	8.44E-05	1.53E-07	1.69E-05	0.	4.06E-06	2.92E-02	3.34E-04
RA225+D	1.28E-03	1.14E-06	2.56E-04	0.	3.02E-05	9.74E-02	2.84E-04
RA226+D	2.34E-01	7.66E-06	1.92E-01	0.	2.03E-04	3.90E-01	3.02E-04
RA228+D	1.49E-01	3.94E-06	1.68E-01	0.	1.04E-04	5.37E-01	5.14E-05
AC225	1.81E-03	1.87E-03	1.21E-04	0.	1.99E-04	7.37E-02	2.67E-04
AC227+D	4.96E+00	8.05E-01	3.07E-01	0.	1.77E-01	8.04E-01	5.22E-05
TH227+D	9.24E-04	1.26E-05	2.67E-05	0.	6.67E-05	1.26E-01	3.49E-04
TH228+D	8.06E-01	1.04E-02	2.72E-02	0.	5.41E-02	3.34E+00	3.59E-04
TH229	1.28E+01	1.76E-01	6.31E-01	0.	8.68E-01	1.04E+01	3.27E-04
TH230	3.30E+00	1.73E-01	9.20E-02	0.	8.52E-01	1.85E+00	3.84E-05
TH232+D	3.68E+00	1.47E-01	1.28E-01	0.	7.28E-01	1.77E+00	3.27E-05
TH234	6.94E-06	3.07E-07	2.00E-07	0.	1.62E-06	6.31E-04	7.32E-05
PA231+D	8.62E+00	2.86E-01	3.43E-01	0.	1.56E+00	1.92E-01	4.57E-05
PA233	4.14E-06	6.48E-07	7.25E-07	0.	2.38E-06	9.77E-05	8.95E-06
U232+D	2.19E-01	0.	1.56E-02	0.	1.67E-02	7.42E-01	4.33E-05
U233+D	4.64E-02	0.	2.82E-03	0.	7.62E-03	1.77E-01	4.00E-05
U234	4.46E-02	0.	2.76E-03	0.	7.47E-03	1.74E-01	3.92E-05
U235+D	4.27E-02	0.	2.59E-03	0.	7.01E-03	1.63E-01	4.98E-05
U236	4.27E-02	0.	2.65E-03	0.	7.16E-03	1.67E-01	3.67E-05
U237	1.57E-07	0.	4.17E-08	0.	4.53E-07	3.40E-05	1.29E-05
U238+D	4.09E-02	0.	2.42E-03	0.	6.55E-03	1.53E-01	3.51E-05
NP237+D	2.88E+00	2.21E-01	1.19E-01	0.	7.41E-01	1.74E-01	5.06E-05
NP238	1.26E-06	2.56E-08	1.97E-08	0.	8.16E-08	3.39E-05	2.50E-05
NP239	1.26E-07	9.04E-09	6.35E-09	0.	2.63E-08	1.57E-05	1.73E-05
PU238	4.77E+00	6.05E-01	1.21E-01	0.	4.47E-01	6.08E-01	4.65E-05
PU239	5.24E+00	6.44E-01	1.28E-01	0.	4.78E-01	5.72E-01	4.24E-05
PU240	5.23E+00	6.43E-01	1.27E-01	0.	4.77E-01	5.71E-01	4.33E-05
PU241+D	1.46E-01	6.33E-03	2.93E-03	0.	1.10E-02	5.06E-04	8.90E-07
PU242	4.85E+00	6.20E-01	1.23E-01	0.	4.60E-01	5.50E-01	4.16E-05
PU244	5.67E+00	7.10E-01	1.41E-01	0.	5.27E-01	6.30E-01	6.20E-05
AM241	1.74E+00	7.85E-01	1.24E-01	0.	7.63E-01	2.02E-01	4.73E-05
AM242M	1.79E+00	7.65E-01	1.27E-01	0.	7.71E-01	8.14E-02	5.96E-05
AM243	1.72E+00	7.53E-01	1.20E-01	0.	7.42E-01	1.92E-01	5.55E-05
CM242	6.33E-02	4.84E-02	4.20E-03	0.	1.34E-02	1.31E-01	5.06E-05
CM243	1.61E+00	7.33E-01	9.95E-02	0.	3.74E-01	2.10E-01	4.98E-05
CM244	1.33E+00	6.48E-01	8.31E-02	0.	3.06E-01	2.02E-01	4.82E-05
CM245	2.14E+00	8.16E-01	1.28E-01	0.	5.03E-01	1.95E-01	4.49E-05
CM246	2.13E+00	8.15E-01	1.28E-01	0.	5.03E-01	1.99E-01	4.41E-05
CM247+D	2.07E+00	8.02E-01	1.26E-01	0.	4.95E-01	1.95E-01	5.80E-05
CM248	1.72E+01	6.61E+00	1.04E+00	0.	4.08E+00	1.61E+00	9.35E-04
CF252	3.92E+00	0.	9.33E-02	0.	0.	6.62E-01	1.84E-04

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TABLE 1.7 (continued)

TEEN INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
H3*	0.	1.59E-07	1.59E-07	1.59E-07	1.59E-07	1.59E-07	1.59E-07
BE10	2.78E-04	4.33E-05	7.09E-06	0.	0.	3.84E-04	1.77E-05
C14	3.25E-06	6.09E-07	6.09E-07	6.09E-07	6.09E-07	6.09E-07	6.09E-07
N13	8.65E-09	8.65E-09	8.65E-09	8.65E-09	8.65E-09	8.65E-09	8.65E-09
F18	6.52E-07	0.	7.10E-08	0.	0.	0.	3.89E-08
NA22	1.76E-05	1.76E-05	1.76E-05	1.76E-05	1.76E-05	1.76E-05	1.76E-05
NA24	1.72E-06	1.72E-06	1.72E-06	1.72E-06	1.72E-06	1.72E-06	1.72E-06
P32	2.36E-04	1.37E-05	8.95E-06	0.	0.	0.	1.16E-05
AR39	0.	0.	0.	0.	0.	4.00E-09	0.
AR41	0.	0.	0.	0.	0.	1.44E-08	0.
CA41	4.05E-05	0.	4.38E-06	0.	0.	1.01E-01	3.03E-07
SC46	7.24E-05	1.41E-04	4.18E-05	0.	1.35E-04	0.	2.98E-05
CR51	0.	0.	1.69E-08	9.37E-09	3.84E-09	2.62E-06	3.75E-07
MN54	0.	6.39E-06	1.05E-06	0.	1.59E-06	2.48E-04	8.35E-06
MN56	0.	2.12E-10	3.15E-11	0.	2.24E-10	1.90E-06	7.18E-06
FE55	4.18E-06	2.98E-06	6.93E-07	0.	0.	1.55E-05	7.99E-07
FE59	1.99E-06	4.62E-06	1.79E-06	0.	0.	1.91E-04	2.23E-05
CO57	0.	1.18E-07	1.15E-07	0.	0.	7.33E-05	3.93E-06
CO58	0.	2.59E-07	3.47E-07	0.	0.	1.68E-04	1.19E-05
CO60	0.	1.89E-06	2.48E-06	0.	0.	1.09E-03	3.24E-05
NI59	5.44E-06	2.02E-06	9.24E-07	0.	0.	1.41E-05	6.48E-07
NI63	7.25E-05	5.43E-06	2.47E-06	0.	0.	3.84E-05	1.77E-06
NI65	2.73E-10	3.66E-11	1.59E-11	0.	0.	1.17E-06	4.59E-06
CU64	0.	2.54E-10	1.06E-10	0.	8.01E-10	1.39E-06	7.68E-06
ZN65	4.82E-06	1.67E-05	7.80E-06	0.	1.08E-05	1.55E-04	5.83E-06
ZN69M+D	1.44E-09	3.39E-09	3.11E-10	0.	2.06E-09	3.92E-06	2.14E-05
ZN69	6.04E-12	1.15E-11	8.07E-13	0.	7.53E-12	1.98E-07	3.56E-08
SE79	0.	5.43E-07	8.71E-08	0.	8.13E-07	7.71E-05	3.53E-06
BR82	0.	0.	2.28E-06	0.	0.	0.	0.
BR83+D	0.	0.	4.30E-08	0.	0.	0.	0.
BR84	0.	0.	5.41E-08	0.	0.	0.	0.
BR85	0.	0.	2.29E-09	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	9.97E-10	0.
KR85M	0.	0.	0.	0.	0.	5.46E-09	0.
KR85	0.	0.	0.	0.	0.	4.63E-09	0.
KR87	0.	0.	0.	0.	0.	2.82E-08	0.
KR88+D	0.	0.	0.	0.	0.	5.81E-08	0.
KR89	0.	0.	0.	0.	0.	3.85E-08	0.
RB86	0.	2.38E-05	1.05E-05	0.	0.	0.	2.21E-06
RB87	0.	1.40E-05	4.58E-06	0.	0.	0.	3.05E-07
RB88	0.	6.82E-08	3.40E-08	0.	0.	0.	3.65E-15
RB89+D	0.	4.40E-08	2.91E-08	0.	0.	0.	4.22E-17
SR89+D	5.43E-05	0.	1.56E-06	0.	0.	3.02E-04	4.64E-05
SR90+D	1.35E-02	0.	8.35E-04	0.	0.	2.06E-03	9.56E-05
SR91+D	1.10E-08	0.	4.39E-10	0.	0.	7.59E-06	3.24E-05
SR92+D	1.19E-09	0.	5.08E-11	0.	0.	3.43E-06	1.49E-05

*Includes a 50% increase to account for percutaneous transpiration.

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TABLE 1.7 (continued)

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	3.73E-07	0.	1.00E-08	0.	0.	3.66E-05	6.99E-05
Y91M+D	4.63E-11	0.	1.77E-12	0.	0.	4.00E-07	3.77E-09
Y91	8.26E-05	0.	2.21E-06	0.	0.	3.67E-04	5.11E-05
Y92	1.84E-09	0.	5.36E-11	0.	0.	3.35E-06	2.06E-05
Y93	1.69E-08	0.	4.65E-10	0.	0.	1.04E-05	7.24E-05
ZR93+D	6.83E-05	3.38E-05	1.84E-05	0.	1.16E-04	3.67E-04	1.60E-05
ZR95+D	1.82E-05	5.73E-06	3.94E-06	0.	8.42E-06	3.36E-04	1.86E-05
ZR97+D	1.72E-08	3.40E-09	1.57E-09	0.	5.15E-09	1.62E-05	7.88E-05
NB93M	4.14E-05	1.36E-05	3.41E-06	0.	1.59E-05	5.36E-05	2.52E-06
NB95	2.32E-06	1.29E-06	7.08E-07	0.	1.25E-06	9.39E-05	1.21E-05
NB97	3.92E-11	9.72E-12	3.55E-12	0.	1.14E-11	4.91E-07	2.71E-07
MO93	0.	1.66E-06	4.52E-08	0.	5.06E-07	8.81E-05	3.99E-06
MO99+D	0.	2.11E-08	4.03E-09	0.	5.14E-08	1.92E-05	3.36E-05
TC99M	1.73E-13	4.83E-13	6.24E-12	0.	7.20E-12	1.44E-07	7.66E-07
TC99	4.48E-08	6.58E-08	1.79E-08	0.	8.35E-07	1.74E-04	7.99E-06
TC101	7.40E-15	1.05E-14	1.03E-13	0.	1.90E-13	8.34E-08	1.09E-16
RU103+D	2.63E-07	0.	1.12E-07	0.	9.29E-07	9.79E-05	1.36E-05
RU105+D	1.40E-10	0.	5.42E-11	0.	1.76E-10	2.27E-06	1.13E-05
RU106+D	1.23E-05	0.	1.55E-06	0.	2.38E-05	2.01E-03	1.20E-04
RH105	1.32E-09	9.48E-10	6.24E-10	0.	4.04E-09	4.09E-06	1.23E-05
PD107	0.	1.17E-07	8.39E-09	0.	9.39E-07	1.63E-05	7.49E-07
PD109	0.	6.56E-10	1.66E-10	0.	3.36E-09	3.19E-06	1.96E-05
AG110M+D	1.73E-06	1.64E-06	9.99E-07	0.	3.13E-06	8.44E-04	3.41E-05
AG111	6.07E-08	2.52E-08	1.26E-08	0.	8.17E-08	4.00E-05	3.00E-05
CD113M	0.	2.17E-04	7.10E-06	0.	2.43E-04	3.59E-04	1.68E-05
CD115M	0.	3.48E-05	1.14E-06	0.	2.82E-05	3.03E-04	5.10E-05
SN123	4.31E-05	9.44E-07	1.40E-06	7.55E-07	0.	4.96E-04	4.16E-05
SN125+D	1.66E-06	4.42E-08	9.99E-08	3.45E-08	0.	1.26E-04	7.29E-05
SN126+D	2.18E-04	5.39E-06	8.24E-06	1.42E-06	0.	1.72E-03	1.68E-05
SB124	5.38E-06	9.92E-08	2.10E-06	1.22E-08	0.	4.81E-04	4.98E-05
SB125+D	9.23E-06	1.01E-07	2.15E-06	8.80E-09	0.	3.42E-04	1.24E-05
SB126	6.19E-07	1.27E-08	2.23E-07	3.50E-09	0.	1.55E-04	6.01E-05
SB127	4.64E-08	9.92E-10	1.75E-08	5.21E-10	0.	3.31E-05	3.94E-05
TE125M	6.10E-07	2.80E-07	8.34E-08	1.75E-07	0.	6.70E-05	9.38E-06
TE127M+D	2.25E-06	1.02E-06	2.73E-07	5.48E-07	8.17E-06	2.07E-04	1.99E-05
TE127	2.51E-10	1.14E-10	5.52E-11	1.77E-10	9.10E-10	1.40E-06	1.01E-05
TE129M+D	1.74E-06	8.23E-07	2.81E-07	5.72E-07	6.49E-06	2.47E-04	5.06E-05
TE129	8.87E-12	4.22E-12	2.20E-12	6.48E-12	3.32E-11	4.12E-07	2.02E-07
TE131M+D	1.23E-08	7.51E-09	5.03E-09	9.06E-09	5.49E-08	2.97E-05	7.76E-05
TE131+D	1.97E-12	1.04E-12	6.30E-13	1.55E-12	7.72E-12	2.92E-07	1.89E-09
TE132+D	4.50E-08	3.63E-08	2.74E-08	3.07E-08	2.44E-07	5.61E-05	5.79E-05
TE133M+D	1.01E-11	7.33E-12	5.71E-12	8.18E-12	5.07E-11	8.71E-07	1.23E-07
TE134+D	5.31E-12	4.35E-12	3.64E-12	4.46E-12	2.91E-11	6.75E-07	1.37E-09
I129	3.53E-06	2.94E-06	4.90E-06	3.66E-03	5.26E-06	0.	2.29E-07
I130	7.80E-07	2.24E-06	8.96E-07	1.86E-04	3.44E-06	0.	1.14E-06
I131+D	4.43E-06	6.14E-06	3.30E-06	1.83E-03	1.05E-05	0.	8.11E-07

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TABLE 1.7 (continued)

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
I132	1.99E-07	5.47E-07	1.97E-07	1.89E-05	8.65E-07	0.	1.59E-07
I133+D	1.52E-06	2.56E-06	7.78E-07	3.65E-04	4.49E-06	0.	1.29E-06
I134	1.11E-07	2.90E-07	1.05E-07	4.94E-06	4.58E-07	0.	2.55E-09
I135+D	4.62E-07	1.18E-06	4.36E-07	7.76E-05	1.86E-06	0.	8.69E-07
XE131M	0.	0.	0.	0.	0.	2.70E-09	0.
XE133M	0.	0.	0.	0.	0.	3.59E-09	0.
XE133	0.	0.	0.	0.	0.	2.99E-09	0.
XE135M	0.	0.	0.	0.	0.	3.88E-09	0.
XE135	0.	0.	0.	0.	0.	7.55E-09	0.
XE137	0.	0.	0.	0.	0.	3.33E-08	0.
XE138+D	0.	0.	0.	0.	0.	4.38E-08	0.
CS134M+D	2.20E-08	4.35E-08	2.35E-08	0.	2.54E-08	4.56E-09	2.02E-08
CS134	6.28E-05	1.41E-04	6.86E-05	0.	4.69E-05	1.83E-05	1.22E-06
CS135	2.08E-05	1.82E-05	4.47E-06	0.	7.30E-06	2.70E-06	2.23E-07
CS136	6.44E-06	2.42E-05	1.71E-05	0.	1.38E-05	2.22E-06	1.36E-06
CS137+D	8.38E-05	1.06E-04	3.89E-05	0.	3.80E-05	1.51E-05	1.06E-06
CS138	5.82E-08	1.07E-07	5.58E-08	0.	8.28E-08	9.84E-09	3.38E-11
CS139+D	3.65E-08	5.12E-08	1.97E-08	0.	4.34E-08	4.86E-09	1.66E-23
BA139	1.67E-10	1.18E-13	4.87E-12	0.	1.11E-13	8.08E-07	8.06E-07
BA140+D	6.84E-06	8.38E-09	4.40E-07	0.	2.85E-09	2.54E-04	2.86E-05
BA141+D	1.78E-11	1.32E-14	5.93E-13	0.	1.23E-14	4.11E-07	9.33E-14
BA142+D	4.62E-12	4.63E-15	2.84E-13	0.	3.92E-15	2.39E-07	5.99E-20
LA140	5.99E-08	2.95E-08	7.82E-09	0.	0.	2.68E-05	6.09E-05
LA141	7.63E-10	2.35E-10	3.87E-11	0.	0.	2.31E-06	1.54E-05
LA142	1.20E-10	5.31E-11	1.32E-11	0.	0.	1.27E-06	1.50E-06
CE141	3.55E-06	2.37E-06	2.71E-07	0.	1.11E-06	7.67E-05	1.58E-05
CE143+D	3.32E-08	2.42E-08	2.70E-09	0.	1.08E-08	1.63E-05	3.19E-05
CE144+D	6.11E-04	2.53E-04	3.28E-05	0.	1.51E-04	1.67E-03	1.08E-04
PR143	1.67E-06	6.64E-07	8.28E-08	0.	3.86E-07	6.04E-05	2.67E-05
PR144	5.37E-12	2.20E-12	2.72E-13	0.	1.26E-12	2.19E-07	2.94E-14
ND147+D	9.83E-07	1.07E-06	6.41E-08	0.	6.28E-07	4.65E-05	2.28E-05
PM147	1.15E-04	1.10E-05	4.50E-06	0.	2.10E-05	1.14E-04	5.87E-06
PM148M+D	1.32E-05	3.35E-06	2.62E-06	0.	5.07E-06	3.20E-04	4.10E-05
PM148	5.44E-07	8.88E-08	4.48E-08	0.	1.60E-07	6.52E-05	6.14E-05
PM149	4.91E-08	6.89E-09	2.84E-09	0.	1.31E-08	1.24E-05	2.79E-05
PM151	1.20E-08	1.99E-09	1.01E-09	0.	3.57E-09	6.56E-06	2.27E-05
SM151	1.07E-04	2.10E-05	4.86E-06	0.	2.27E-05	7.68E-05	3.53E-06
SM153	2.43E-08	2.01E-08	1.47E-09	0.	6.56E-09	7.11E-06	1.77E-05
EU152	2.96E-04	7.19E-05	6.30E-05	0.	3.34E-04	5.01E-04	1.35E-05
EU154	9.43E-04	1.23E-04	8.60E-05	0.	5.44E-04	9.12E-04	3.34E-05
EU155	2.00E-04	1.96E-05	1.21E-05	0.	7.65E-05	1.51E-03	5.97E-05
EU156	2.70E-06	2.03E-06	3.30E-07	0.	1.36E-06	1.37E-04	4.56E-05
TB160	3.04E-05	0.	3.79E-06	0.	1.20E-05	2.97E-04	2.60E-05
HO166M	4.40E-04	1.36E-04	9.87E-05	0.	2.00E-04	6.24E-04	1.68E-05
W181	8.90E-09	2.88E-09	3.01E-10	0.	0.	2.95E-06	2.69E-07
W185	2.78E-07	9.17E-08	9.73E-09	0.	0.	9.60E-05	1.14E-05
W187	1.50E-09	1.22E-09	4.29E-10	0.	0.	5.92E-06	2.21E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	3.09E-02	8.28E-03	1.07E-03	0.	2.95E-02	4.52E-02	3.87E-05
BI210+D	0.	2.26E-06	1.89E-07	0.	2.74E-05	1.91E-03	3.19E-05
PO210	5.68E-04	1.22E-03	1.37E-04	0.	4.21E-03	5.41E-02	4.45E-05
RN222+D	0.	0.	0.	0.	0.	3.94E-06	0.
RA223+D	2.57E-04	3.93E-07	5.14E-05	0.	1.12E-05	4.39E-02	3.04E-04
RA224+D	2.83E-05	6.77E-08	5.65E-06	0.	1.93E-06	1.51E-02	3.29E-04
RA225+D	4.28E-04	5.04E-07	8.56E-05	0.	1.44E-05	5.04E-02	2.89E-04
RA226+D	1.33E-01	3.38E-06	9.87E-02	0.	9.67E-05	2.02E-01	3.11E-04
RA228+D	5.34E-02	1.74E-06	5.88E-02	0.	4.97E-05	2.78E-01	5.30E-05
AC225	6.04E-04	8.25E-04	4.06E-05	0.	9.47E-05	3.81E-02	2.70E-04
AC227+D	2.49E+00	3.69E-01	1.48E-01	0.	1.07E-01	4.16E-01	5.38E-05
TH227+D	3.09E-04	5.56E-06	8.93E-06	0.	3.18E-05	6.50E-02	3.57E-04
TH228+D	2.60E-01	4.37E-03	8.78E-03	0.	2.45E-02	1.69E+00	3.70E-04
TH229	9.06E+00	1.36E-01	4.45E-01	0.	6.67E-01	5.05E+00	3.36E-04
TH230	2.34E+00	1.34E-01	6.49E-02	0.	6.55E-01	8.98E-01	3.95E-05
TH232+D	2.61E+00	1.14E-01	9.21E-02	0.	5.60E-01	8.60E-01	3.36E-05
TH234	2.32E-06	1.35E-07	6.71E-08	0.	7.73E-07	3.26E-04	7.49E-05
PA231+D	5.32E+00	2.00E-01	2.07E-01	0.	1.12E+00	9.91E-02	4.71E-05
PA233	1.68E-06	3.24E-07	2.89E-07	0.	1.22E-06	5.39E-05	1.00E-05
U232+D	7.31E-02	0.	5.23E-03	0.	7.94E-03	3.84E-01	4.46E-05
U233+D	1.55E-02	0.	9.42E-04	0.	3.63E-03	9.18E-02	4.12E-05
U234	1.48E-02	0.	9.23E-04	0.	3.55E-03	8.99E-02	4.04E-05
U235+D	1.42E-02	0.	8.67E-04	0.	3.34E-03	8.44E-02	5.13E-05
U236	1.42E-02	0.	8.86E-04	0.	3.41E-03	8.62E-02	3.79E-05
U237	5.25E-08	0.	1.40E-08	0.	2.16E-07	1.76E-05	1.29E-05
U238+D	1.36E-02	0.	8.10E-04	0.	3.12E-03	7.89E-02	3.62E-05
NP237+D	1.77E+00	1.54E-01	7.21E-02	0.	5.35E-01	8.99E-02	5.22E-05
NP238	4.23E-07	1.13E-08	6.59E-09	0.	3.88E-08	1.75E-05	2.38E-05
NP239	4.23E-08	3.99E-09	2.21E-09	0.	1.25E-08	8.11E-06	1.65E-05
PU238	2.86E+00	4.06E-01	7.22E-02	0.	3.10E-01	3.12E-01	4.79E-05
PU239	3.31E+00	4.50E-01	8.05E-02	0.	3.44E-01	2.93E-01	4.37E-05
PU240	3.31E+00	4.49E-01	8.04E-02	0.	3.43E-01	2.93E-01	4.46E-05
PU241+D	6.97E-02	3.57E-03	1.40E-03	0.	6.47E-03	2.60E-04	9.17E-07
PU242	3.07E+00	4.33E-01	7.75E-02	0.	3.31E-01	2.82E-01	4.29E-05
PU244	3.59E+00	4.96E-01	8.88E-02	0.	3.79E-01	3.23E-01	6.39E-05
AM241	1.06E+00	4.07E-01	7.10E-02	0.	5.32E-01	1.05E-01	4.88E-05
AM242M	1.07E+00	3.93E-01	7.15E-02	0.	5.30E-01	4.21E-02	6.14E-05
AM243	1.06E+00	3.92E-01	6.95E-02	0.	5.21E-01	9.91E-02	5.72E-05
CM242	2.12E-02	2.14E-02	1.41E-03	0.	6.40E-03	6.76E-02	5.21E-05
CM243	8.45E-01	3.50E-01	5.00E-02	0.	2.34E-01	1.09E-01	5.13E-05
CM244	6.46E-01	3.03E-01	3.88E-02	0.	1.81E-01	1.05E-01	4.96E-05
CM245	1.32E+00	4.11E-01	7.53E-02	0.	3.52E-01	1.01E-01	4.63E-05
CM246	1.31E+00	4.11E-01	7.52E-02	0.	3.51E-01	1.03E-01	4.54E-05
CM247+D	1.28E+00	4.04E-01	7.41E-02	0.	3.46E-01	1.01E-01	5.97E-05
CM248	1.06E+01	3.33E+00	6.11E-01	0.	2.85E+00	8.32E-01	9.63E-04
CF252	1.29E+00	0.	3.07E-02	0.	0.	3.43E-01	1.89E-04

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
H3*	0.	1.58E-07	1.58E-07	1.58E-07	1.58E-07	1.58E-07	1.58E-07
BE10	1.98E-04	3.06E-05	4.96E-06	0.	0.	2.22E-04	1.67E-05
C14	2.27E-06	4.26E-07	4.26E-07	4.26E-07	4.26E-07	4.26E-07	4.26E-07
N13	6.27E-09	6.27E-09	6.27E-09	6.27E-09	6.27E-09	6.27E-09	6.27E-09
F18	4.71E-07	0.	5.19E-08	0.	0.	0.	9.24E-09
NA22	1.30E-05	1.30E-05	1.30E-05	1.30E-05	1.30E-05	1.30E-05	1.30E-05
NA24	1.28E-06	1.28E-06	1.28E-06	1.28E-06	1.28E-06	1.28E-06	1.28E-06
P32	1.65E-04	9.64E-06	6.26E-06	0.	0.	0.	1.08E-05
AR39	0.	0.	0.	0.	0.	2.08E-09	0.
AR41	0.	0.	0.	0.	0.	8.06E-09	0.
CA41	3.83E-05	0.	4.13E-06	0.	0.	3.83E-06	2.86E-07
SC46	5.51E-05	1.07E-04	3.11E-05	0.	9.99E-05	0.	3.23E-05
CR51	0.	0.	1.25E-08	7.44E-09	2.85E-09	1.80E-06	4.15E-07
MN54	0.	4.95E-06	7.87E-07	0.	1.23E-06	1.75E-04	9.67E-06
MN56	0.	1.55E-10	2.29E-11	0.	1.63E-10	1.18E-06	2.53E-06
FE55	3.07E-06	2.12E-06	4.93E-07	0.	0.	9.01E-06	7.54E-07
FE59	1.47E-06	3.47E-06	1.32E-06	0.	0.	1.27E-04	2.35E-05
CO57	0.	8.65E-08	8.39E-08	0.	0.	4.62E-05	3.93E-06
CO58	0.	1.98E-07	2.59E-07	0.	0.	1.16E-04	1.33E-05
CO60	0.	1.44E-06	1.85E-06	0.	0.	7.46E-04	3.56E-05
NI59	4.06E-06	1.46E-06	6.77E-07	0.	0.	8.20E-06	6.11E-07
NI63	5.40E-05	3.93E-06	1.81E-06	0.	0.	2.23E-05	1.67E-06
NI65	1.92E-10	2.62E-11	1.14E-11	0.	0.	7.00E-07	1.54E-06
CU64	0.	1.83E-10	7.69E-11	0.	5.78E-10	8.48E-07	6.12E-06
ZN65	4.05E-06	1.29E-05	5.82E-06	0.	8.62E-06	1.08E-04	6.68E-06
ZN69M+D	1.02E-09	2.45E-09	2.24E-10	0.	1.48E-09	2.38E-06	1.71E-05
ZN69	4.23E-12	8.14E-12	5.65E-13	0.	5.27E-12	1.15E-07	2.04E-09
SE79	0.	3.83E-07	6.09E-08	0.	5.69E-07	4.47E-05	3.33E-06
BR82	0.	0.	1.69E-06	0.	0.	0.	1.30E-06
BR83+D	0.	0.	3.01E-08	0.	0.	0.	2.90E-08
BR84	0.	0.	3.91E-08	0.	0.	0.	2.05E-13
BR85	0.	0.	1.60E-09	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	5.19E-10	0.
KR85M	0.	0.	0.	0.	0.	2.91E-09	0.
KR85	0.	0.	0.	0.	0.	2.41E-09	0.
KR87	0.	0.	0.	0.	0.	1.53E-08	0.
KR88+D	0.	0.	0.	0.	0.	3.13E-08	0.
KR89	0.	0.	0.	0.	0.	2.13E-08	0.
RB86	0.	1.69E-05	7.37E-06	0.	0.	0.	2.08E-06
RB87	0.	9.86E-06	3.21E-06	0.	0.	0.	2.88E-07
RB88	0.	4.84E-08	2.41E-08	0.	0.	0.	4.18E-19
RB89+D	0.	3.20E-08	2.12E-08	0.	0.	0.	1.16E-21
SR89+D	3.80E-05	0.	1.09E-06	0.	0.	1.75E-04	4.37E-05
SR90+D	1.24E-02	0.	7.62E-04	0.	0.	1.20E-03	9.02E-05
SR91+D	7.74E-09	0.	3.13E-10	0.	0.	4.56E-06	2.39E-05
SR92+D	8.43E-10	0.	3.64E-11	0.	0.	2.06E-06	5.38E-06

*Includes a 50% increase to account for percutaneous transpiration.

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	2.61E-07	0.	7.01E-09	0.	0.	2.12E-05	6.32E-05
Y91M+D	3.26E-11	0.	1.27E-12	0.	0.	2.40E-07	1.66E-10
Y91	5.78E-05	0.	1.55E-06	0.	0.	2.13E-04	4.81E-05
Y92	1.29E-09	0.	3.77E-11	0.	0.	1.96E-06	9.19E-06
Y93	1.18E-08	0.	3.26E-10	0.	0.	6.06E-06	5.27E-05
ZR93+D	5.22E-05	2.92E-06	1.37E-06	0.	1.11E-05	2.13E-05	1.51E-06
ZR95+D	1.34E-05	4.30E-06	2.91E-06	0.	6.77E-06	2.21E-04	1.88E-05
ZR97+D	1.21E-08	2.45E-09	1.13E-09	0.	3.71E-09	9.84E-06	6.54E-05
NB93M	3.10E-05	1.01E-05	2.49E-06	0.	1.16E-05	3.11E-05	2.38E-06
NB95	1.76E-06	9.77E-07	5.26E-07	0.	9.67E-07	6.31E-05	1.30E-05
NB97	2.78E-11	7.03E-12	2.56E-12	0.	8.18E-12	3.00E-07	3.02E-08
MO93	0.	1.17E-06	3.17E-08	0.	3.55E-07	5.11E-05	3.79E-06
MO99+D	0.	1.51E-08	2.87E-09	0.	3.64E-08	1.14E-05	3.10E-05
TC99M	1.29E-13	3.64E-13	4.63E-12	0.	5.52E-12	9.55E-08	5.20E-07
TC99	3.13E-08	4.64E-08	1.25E-08	0.	5.85E-07	1.01E-04	7.54E-06
TC101	5.22E-15	7.52E-15	7.38E-14	0.	1.35E-13	4.99E-08	1.36E-21
RU103+D	1.91E-07	0.	8.23E-08	0.	7.29E-07	6.31E-05	1.38E-05
RU105+D	9.88E-11	0.	3.89E-11	0.	1.27E-10	1.37E-06	6.02E-06
RU106+D	8.64E-06	0.	1.09E-06	0.	1.67E-05	1.17E-03	1.14E-04
RH105	9.24E-10	6.73E-10	4.43E-10	0.	2.86E-09	2.41E-06	1.09E-05
PD107	0.	8.27E-08	5.87E-09	0.	6.57E-07	9.47E-06	7.06E-07
PD109	0.	4.63E-10	1.16E-10	0.	2.35E-09	1.85E-06	1.52E-05
AG110M+D	1.35E-06	1.25E-06	7.43E-07	0.	2.46E-06	5.79E-04	3.78E-05
AG111	4.25E-08	1.78E-08	8.87E-09	0.	5.74E-08	2.33E-05	2.79E-05
CD113M	0.	1.54E-04	4.97E-06	0.	1.71E-04	2.08E-04	1.59E-05
CD115M	0.	2.46E-05	7.95E-07	0.	1.98E-05	1.76E-04	4.80E-05
SN123	3.02E-05	6.67E-07	9.82E-07	5.67E-07	0.	2.88E-04	3.92E-05
SN125+D	1.16E-06	3.12E-08	7.03E-08	2.59E-08	0.	7.37E-05	6.81E-05
SN126+D	1.58E-04	4.18E-06	6.00E-06	1.23E-06	0.	1.17E-03	1.59E-05
SB124	3.90E-06	7.36E-08	1.55E-06	9.44E-09	0.	3.10E-04	5.08E-05
SB125+D	6.67E-06	7.44E-08	1.58E-06	6.75E-09	0.	2.18E-04	1.26E-05
SB126	4.50E-07	9.13E-09	1.62E-07	2.75E-09	0.	9.57E-05	6.01E-05
SB127	3.30E-08	7.22E-10	1.27E-08	3.97E-10	0.	2.05E-05	3.77E-05
TE125M	4.27E-07	1.98E-07	5.84E-08	1.31E-07	1.55E-06	3.92E-05	8.83E-06
TE127M+D	1.58E-06	7.21E-07	1.96E-07	4.11E-07	5.72E-06	1.20E-04	1.87E-05
TE127	1.75E-10	8.03E-11	3.87E-11	1.32E-10	6.37E-10	8.14E-07	7.17E-06
TE129M+D	1.22E-06	5.84E-07	1.98E-07	4.30E-07	4.57E-06	1.45E-04	4.79E-05
TE129	6.22E-12	2.99E-12	1.55E-12	4.87E-12	2.34E-11	2.42E-07	1.96E-08
TE131M+D	8.74E-09	5.45E-09	3.63E-09	6.88E-09	3.86E-08	1.82E-05	6.95E-05
TE131+D	1.39E-12	7.44E-13	4.49E-13	1.17E-12	5.46E-12	1.74E-07	2.30E-09
TE132+D	3.25E-08	2.69E-08	2.02E-08	2.37E-08	1.82E-07	3.60E-05	6.37E-05
TE133M+D	7.24E-12	5.40E-12	4.17E-12	6.27E-12	3.74E-11	5.51E-07	5.49E-08
TE134+D	3.84E-12	3.22E-12	1.57E-12	3.44E-12	2.18E-11	4.343-07	2.97E-11
I129	2.48E-06	2.11E-06	6.91E-06	5.54E-03	4.53E-06	0.	2.22E-07
I130	5.72E-07	1.68E-06	6.60E-07	1.42E-04	2.61E-06	0.	9.61E-07
I131+D	3.15E-06	4.47E-06	2.56E-06	1.49E-03	7.66E-06	0.	7.85E-07

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TABLE 1.7 (continued)

ADULT INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
I132	1.45E-07	4.07E-07	1.45E-07	1.43E-05	6.48E-07	0.	5.08E-08
I133+D	1.08E-06	1.85E-06	5.65E-07	2.69E-04	3.23E-06	0.	1.11E-06
I134	8.05E-08	2.16E-07	7.69E-08	3.73E-06	3.44E-07	0.	1.26E-10
I135+D	3.35E-07	8.73E-07	3.21E-07	5.60E-05	1.39E-06	0.	6.56E-07
XE131M	0.	0.	0.	0.	0.	1.40E-09	0.
XE133M	0.	0.	0.	0.	0.	1.89E-09	0.
XE133	0.	0.	0.	0.	0.	1.57E-09	0.
XE135M	0.	0.	0.	0.	0.	2.22E-09	0.
XE135	0.	0.	0.	0.	0.	4.05E-09	0.
XE137	0.	0.	0.	0.	0.	1.74E-08	0.
XE138+D	0.	0.	0.	0.	0.	2.44E-08	0.
CS134M+D	1.59E-08	3.20E-08	1.72E-08	0.	1.83E-08	2.93E-09	7.92E-09
CS134	4.66E-05	1.06E-04	9.10E-05	0.	3.59E-05	1.22E-05	1.30E-06
CS135	1.46E-05	1.29E-05	5.99E-06	0.	5.11E-06	1.57E-06	2.11E-07
CS136	4.88E-06	1.83E-05	1.38E-05	0.	1.07E-05	1.50E-06	1.46E-06
CS137+D	5.98E-05	7.76E-05	5.35E-05	0.	2.78E-05	9.40E-06	1.05E-06
CS138	4.14E-08	7.76E-08	4.05E-08	0.	6.00E-08	6.07E-09	2.33E-13
CS139+D	2.56E-08	3.63E-08	1.39E-08	0.	3.05E-08	2.84E-09	5.49E-31
BA139	1.17E-10	8.32E-14	3.42E-12	0.	7.78E-14	4.70E-07	1.12E-07
BA140+D	4.88E-06	6.13E-09	3.21E-07	0.	2.09E-09	1.59E-04	2.73E-05
BA141+D	1.25E-11	9.41E-15	4.20E-13	0.	8.75E-15	2.42E-07	1.45E-17
BA142+D	3.29E-12	3.38E-15	2.07E-13	0.	2.86E-15	1.49E-07	1.96E-26
LA140	4.30E-08	2.17E-08	5.73E-09	0.	0.	1.70E-05	5.73E-05
LA141	5.34E-10	1.66E-10	2.71E-11	0.	0.	1.35E-06	7.31E-06
LA142	8.54E-11	3.88E-11	9.65E-12	0.	0.	7.91E-07	2.64E-07
CE141	2.49E-06	1.69E-06	1.91E-07	0.	7.83E-07	4.52E-05	1.50E-05
CE143+D	2.33E-08	1.72E-08	1.91E-09	0.	7.60E-09	9.97E-06	2.83E-05
CE144+D	4.29E-04	1.79E-04	2.30E-05	0.	1.06E-04	9.72E-04	1.02E-04
PR143	1.17E-06	4.69E-07	5.80E-08	0.	2.70E-07	3.51E-05	2.50E-05
PR144	3.76E-12	1.56E-12	1.91E-13	0.	8.81E-13	1.27E-07	2.69E-18
ND147+D	6.59E-07	7.62E-07	4.56E-08	0.	4.45E-07	2.76E-05	2.16E-05
PM147	8.37E-05	7.87E-06	3.19E-06	0.	1.49E-05	6.60E-05	5.54E-06
PM148M+D	9.82E-06	2.54E-06	1.94E-06	0.	3.85E-06	2.14E-04	4.18E-05
PM148	3.84E-07	6.37E-08	3.20E-08	0.	1.20E-07	3.91E-05	5.80E-05
PM149	3.44E-08	4.87E-09	1.99E-09	0.	9.19E-09	7.21E-06	2.50E-05
PM151	8.50E-09	1.42E-09	7.21E-10	0.	2.55E-09	3.94E-06	2.00E-05
SM151	8.59E-05	1.48E-05	3.55E-06	0.	1.66E-05	4.45E-05	3.25E-06
SM153	1.70E-08	1.42E-08	1.04E-09	0.	4.59E-09	4.14E-06	1.58E-05
EU152	2.38E-04	5.41E-05	4.76E-05	0.	3.35E-04	3.43E-04	1.59E-05
EU154	7.40E-04	9.10E-05	6.48E-05	0.	4.36E-04	5.84E-04	3.40E-05
EU155	1.01E-04	1.43E-05	9.21E-06	0.	6.59E-05	9.46E-05	5.95E-06
EU156	1.93E-06	1.48E-06	2.40E-07	0.	9.95E-07	8.56E-05	4.50E-05
TB160	2.21E-05	0.	2.75E-06	0.	9.10E-06	1.92E-04	2.68E-05
HO166M	3.37E-04	1.05E-04	8.00E-05	0.	1.57E-04	3.94E-04	1.59E-05
W181	6.23E-09	2.03E-09	2.17E-10	0.	0.	1.71E-06	2.53E-07
W185	1.95E-07	6.47E-08	6.81E-09	0.	0.	5.57E-05	1.07E-05
W187	1.06E-09	8.85E-10	3.10E-10	0.	0.	3.63E-06	1.94E-05

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TABLE 1.7 (continued)

ADULT INHALATION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INHALED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	2.64E-02	6.73E-03	8.37E-04	0.	2.12E-02	2.62E-02	3.65E-05
BI210+D	0.	1.59E-06	1.32E-07	0.	1.92E-05	1.11E-03	2.95E-05
PO210	3.97E-04	8.60E-04	9.58E-05	0.	2.95E-03	3.14E-02	4.19E-05
RN222+D	0.	0.	0.	0.	0.	2.05E-06	0.
RA223+D	1.80E-04	2.77E-07	3.60E-05	0.	7.85E-06	2.55E-02	2.84E-04
RA224+D	1.98E-05	4.78E-08	3.96E-06	0.	1.35E-06	8.77E-03	3.01E-04
RA225+D	3.00E-04	3.56E-07	5.99E-05	0.	1.01E-05	2.92E-02	2.71E-04
RA226+D	1.25E-01	2.39E-06	9.14E-02	0.	6.77E-05	1.17E-01	2.94E-04
RA228+D	4.41E-02	1.23E-06	4.78E-02	0.	3.48E-05	1.61E-01	5.00E-05
AC225	4.23E-04	5.82E-04	2.84E-05	0.	6.63E-05	2.21E-02	2.52E-04
AC227+D	2.30E+00	3.05E-01	1.36E-01	0.	9.82E-02	2.41E-01	5.08E-05
TH227+D	2.17E-04	3.92E-06	6.25E-06	0.	2.22E-05	3.77E-02	3.34E-04
TH226+D	2.00E-01	3.39E-03	6.77E-03	0.	1.89E-02	1.01E+00	3.49E-04
TH229	8.88E+00	1.33E-01	4.36E-01	0.	6.52E-01	3.49E+00	3.17E-04
TH230	2.29E+00	1.31E-01	6.36E-02	0.	6.40E-01	6.21E-01	3.73E-05
TH232+D	2.56E+00	1.12E-01	9.04E-02	0.	5.47E-01	5.96E-01	3.17E-05
TH234	1.63E-06	9.56E-08	4.70E-08	0.	5.41E-07	1.89E-04	7.03E-05
PA231+D	5.08E+00	1.91E-01	1.98E-01	0.	1.07E+00	5.75E-02	4.44E-05
PA233	1.21E-06	2.42E-07	2.09E-07	0.	9.15E-07	3.52E-05	1.02E-05
U232+D	5.14E-02	0.	3.66E-03	0.	5.56E-03	2.22E-01	4.21E-05
U233+D	1.09E-02	0.	6.60E-04	0.	2.54E-03	5.32E-02	3.89E-05
U234	1.04E-02	0.	6.46E-04	0.	2.49E-03	5.22E-02	3.81E-05
U235+D	1.00E-02	0.	6.07E-04	0.	2.34E-03	4.90E-02	4.84E-05
U236	1.00E-02	0.	6.20E-04	0.	2.39E-03	5.00E-02	3.57E-05
U237	3.67E-08	0.	9.77E-09	0.	1.51E-07	1.02E-05	1.20E-05
U238+D	9.58E-03	0.	5.67E-04	0.	2.18E-03	4.58E-02	3.41E-05
NP237+D	1.69E+00	1.47E-01	6.87E-02	0.	5.10E-01	5.22E-02	4.92E-05
NP238	2.96E-07	8.00E-09	4.61E-09	0.	2.72E-08	1.02E-05	2.13E-05
NP239	2.87E-08	2.82E-09	1.55E-09	0.	8.75E-09	4.70E-06	1.49E-05
PU238	2.74E+00	3.87E-01	6.90E-02	0.	2.96E-01	1.82E-01	4.52E-05
PU239	3.19E+00	4.31E-01	7.75E-02	0.	3.30E-01	1.72E-01	4.13E-05
PU240	3.18E+00	4.30E-01	7.73E-02	0.	3.29E-01	1.72E-01	4.21E-05
PU241+D	6.41E-02	3.28E-03	1.29E-03	0.	5.93E-03	1.52E-04	8.65E-07
PU242	2.95E+00	4.15E-01	7.46E-02	0.	3.17E-01	1.65E-01	4.05E-05
PU244	3.45E+00	4.76E-01	8.54E-02	0.	3.64E-01	1.89E-01	6.03E-05
AM241	1.01E+00	3.59E-01	6.71E-02	0.	5.04E-01	6.06E-02	4.60E-05
AM242M	1.02E+00	3.46E-01	6.73E-02	0.	5.01E-01	2.44E-02	5.79E-05
AM243	1.01E+00	3.47E-01	6.57E-02	0.	4.95E-01	5.75E-02	5.40E-05
CM242	1.48E-02	1.51E-02	9.84E-04	0.	4.48E-03	3.92E-02	4.91E-05
CM243	7.86E-01	2.97E-01	4.61E-02	0.	2.15E-01	6.31E-02	4.84E-05
CM244	5.90E-01	2.54E-01	3.51E-02	0.	1.64E-01	6.06E-02	4.68E-05
CM245	1.26E+00	3.59E-01	7.14E-02	0.	3.33E-01	5.85E-02	4.36E-05
CM246	1.25E+00	3.59E-01	7.13E-02	0.	3.33E-01	5.96E-02	4.29E-05
CM247+D	1.22E+00	3.53E-01	7.03E-02	0.	3.28E-01	5.85E-02	5.63E-05
CM248	1.01E+01	2.91E+00	5.79E-01	0.	2.70E+00	4.82E-01	9.09E-04
CF252	9.78E-01	0.	2.33E-02	0.	0.	1.99E-01	1.78E-04

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TABLE 1.8
EXTERNAL DOSE FACTORS FOR STANDING ON CONTAMINATION GROUND (DFG_i)
(MREM/HR PER PCI/M²)

ELEMENT	TOTAL BODY	SKIN
H-3	0.0	0.0
C-14	0.0	0.0
Na-24	2.50E-08	2.90E-08
P-32	0.0	0.0
Cr-51	2.20E-10	2.60E-10
Mn-54	5.80E-09	6.80E-09
Mn-56	1.10E-08	1.30E-08
Fe-55	0.0	0.0
Fe-59	8.00E-09	9.40E-09
Co-58	7.00E-09	8.20E-09
Co-60	1.70E-08	2.00E-08
Ni-63	0.0	0.0
Ni-65	3.70E-09	4.30E-09
Cu-64	1.50E-09	1.70E-09
Zn-65	4.00E-09	4.60E-09
Zn-69	0.0	0.0
Br-83	6.40E-11	9.30E-11
Br-84	1.20E-08	1.40E-08
Br-85	0.0	0.0
Rb-86	6.30E-10	7.20E-10
Rb-88	3.50E-09	4.00E-09
Rb-89	1.50E-08	1.80E-08
Sr-89	5.60E-13	6.50E-13
Sr-91	7.10E-09	8.30E-09
Sr-92	9.00E-09	1.00E-08
Y-90	2.20E-12	2.60E-12
Y-91m	3.80E-09	4.40E-09
Y-91	2.40E-11	2.70E-11
Y-92	1.60E-09	1.90E-09
Y-93	5.70E-10	7.80E-10
Zr-95	5.00E-09	5.80E-09
Zr-97	5.50E-09	6.40E-09
Nb-95	5.10E-09	6.00E-09
Mo-99	1.90E-09	2.20E-09
Tc-99m	9.60E-10	1.10E-09
Tc-101	2.70E-09	3.00E-09

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TABLE 1.8 (continued)

EXTERNAL DOSE FACTORS FOR STANDING ON CONTAMINATION GROUND (DFG)
(MREM/HR PER PCI/M²)

<u>ELEMENT</u>	<u>TOTAL BODY</u>	<u>SKIN</u>
Ru-103	3.60E-09	4.20E-09
Ru-105	4.50E-09	5.10E-09
Ru-106	1.50E-09	1.80E-09
Ag-110m	1.80E-08	2.10E-08
Te-125m	3.50E-11	4.80E-11
Te-127m	1.10E-12	1.30E-12
Te-127	1.00E-11	1.10E-11
Te-129m	7.70E-10	9.00E-10
Te-129	7.10E-10	8.40E-10
Te-131m	8.40E-09	9.90E-09
Te-131	2.20E-09	2.60E-06
Te-132	1.70E-09	2.00E-09
I-130	1.40E-08	1.70E-08
I-131	2.80E-09	3.40E-09
I-132	1.70E-08	2.00E-08
I-133	3.70E-09	4.50E-09
I-134	1.60E-08	1.90E-08
I-135	1.20E-08	1.40E-08
Cs-134	1.20E-08	1.40E-08
Cs-136	1.50E-08	1.70E-08
Cs-137	4.20E-09	4.90E-09
Cs-138	2.10E-08	2.40E-08
Ba-139	2.40E-09	2.70E-09
Ba-140	2.10E-09	2.40E-09
Ba-141	4.30E-09	4.90E-09
Ba-142	7.90E-09	9.00E-09
La-140	1.50E-08	1.70E-08
La-142	1.50E-08	1.80E-08
Ce-141	5.50E-10	6.20E-10
Ce-143	2.20E-09	2.50E-09
Ce-144	3.20E-10	3.70E-10
Pr-143	0.0	0.0
Pr-144	2.00E-10	2.30E-10
Nd-147	1.00E-09	1.20E-09
W-187	3.10E-09	3.60E-09
Np-239	9.50E-10	1.10E-09

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Table 1.9
Palisades Annual Gaseous
Design Basis Quantities

Nuclide	Dose Factor (mrem/Ci)	DBQ (Ci)	Age Group, Organ
AR 41	2.55E-04	1.96E+04	T Body
KR 85	1.07E-05	1.87E+05	Site Boundary Beta DR
KR 85M	3.38E-05	1.48E+05	T Body
XE131M	4.24E-05	4.72E+05	Site Boundary Beta DR
XE133	8.48E-06	5.90E+05	T Body
XE133M	8.51E-05	2.35E+05	Site Boundary Beta DR
XE135	5.22E-05	9.58E+04	T Body
H3	3.42E-05	4.39E+05	Child T. Body
MN 54	3.03E-01	4.95E+01	Skin
FE 59	1.88E-01	7.99E+01	Teen GILLI
CO 58	8.31E-02	1.81E+02	Skin
CO 60	5.09E+00	2.95E+00	Skin
NI 65	3.23E-03	4.65E+03	Child GILLI
ZN 65	3.54E-01	4.23E+01	Child Liver
SR89	5.64E+00	2.66E+00	Child Bone
SR90	1.98E+02	7.56E-02	Child Bone
NB 95	1.00E-01	1.49E+02	Teen GILLI
AG110M	7.51E-01	2.00E+01	Skin
SB125	5.01E-01	2.99E+01	Skin
I 131	1.11E+01	1.35E+00	Child Thyroid
I 132	7.76E-03	1.93E+03	Child Thyroid
I 133	1.52E-01	9.85E+01	Child Thyroid
I 135	3.14E-02	4.77E+02	Child Thyroid
CS137	3.60E+00	4.17E+00	Child Bone
CE141	1.10E-01	1.37E+02	Teen GILLI
PU238	4.53E+02	3.31E-02	Teen Bone
PU239	5.22E+02	2.87E-02	Teen Bone
PU241	1.13E+01	1.33E+00	Teen Bone
AM241	5.34E+02	2.81E-02	Teen Bone
CM242	2.04E+01	7.35E-01	Teen Lung
CM244	2.77E+02	5.42E-02	Teen Bone

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II. LIQUID EFFLUENTS

A. CONCENTRATION

1. Requirements

Appendix A, Section III.G requires that the concentration of radioactive material released at any time from the site to unrestricted areas shall be limited to ten times the Effluent Concentration (EC) specified in 10 CFR 20, Appendix B, Table 2, Column 2 for nuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2E-04 $\mu\text{Ci/ml}$ total activity. To ensure compliance, the following approach will be used for each release.

2. Prerelease Analysis

Most tanks will be recirculated through two volume changes prior to sampling for release to the environment to ensure that a representative sample is obtained. The appropriate recirculation time for those tanks too large to provide two volume changes will be the time that the suspended particulate concentration reaches steady state. Either a one-time test, or prior sampling data, may be used to determine appropriate recirculation time.

Prior to release, a grab sample will be analyzed for each release, and the concentration of each radionuclide determined.

$$C = \sum_{i=1}^n C_i \quad (2.1)$$

where:

C = Total concentration in the liquid effluent at the release point, $\mu\text{Ci/ml}$.

C_i = Concentration of a single radionuclide i , $\mu\text{Ci/ml}$.

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3. Effluent Concentration (EC) - Sum of the Ratios

The EC-Fraction (R_j) for each release point will be calculated by the relationship defined by Note 4 of Appendix B, 10 CFR 20:

$$R_j = \sum_i \frac{C_i}{EC_i} \leq 10.0 \quad (2.2)$$

where:

C_i = Effluent concentration of radionuclide i , $\mu\text{Ci/ml}$.

EC_i = The EC of radionuclide i , 10 CFR 20, Appendix B, Table 2, Column 2 - $\mu\text{Ci/ml}$.

R_j = The Total EC-Fraction for the release point.

The sum of the ratios at the discharge to the lake must be ≤ 10 due to the releases from any or all concurrent releases. The following relationship will assure this criterion is met:

$$f_1(R_1 - 1) + f_2(R_2 - 1) + f_3(R_3 - 1) \leq F \quad (2.3)$$

where:

f_1, f_2, f_3 = The effluent flow rate (gallons/minute) for the respective releases, determined by Plant personnel.

R_1, R_2, R_3 = The Total EC-Fractions for the respective releases as determined by Equation 2.2.

F = Minimum required dilution flow rate. Normally, a conservatively high dilution flow rate is used, that is, flow rate used = $(b_i)(F)$ where b_i is a conservative factor greater than 1.0.

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B. INSTRUMENT SETPOINTS

1. Setpoint Determination

Appendix A, Section III.F requires alarm setpoints for each liquid effluent monitor will be established using Plant instructions to ensure the requirements of Appendix A, Section III.G are not exceeded. Concentration, flow rate, dilution, principal gamma emitter, geometry, and detector efficiency are combined to give an equivalent setpoint in counts per minute (cpm). The identification number for each liquid effluent radiation detector is contained in Figure 2-2.

The respective alarm/trip setpoints at each release point will be set such that the sum of the ratios at each point, as calculated by Equation 2.2, will not be exceeded. The value of R is directly related to the total concentration calculated by Equation 2.1. An increase in the concentration would indicate an increase in the value of R. A large increase would cause the limits specified in Section 2.1.1 to be exceeded. The minimum alarm/trip setpoint value is equal to the release concentration, but for ease of operation it may be desired that the setpoint (S) be set above the effluent concentration (C) by the same factor (b) utilized in setting dilution flow. That is:

$$S = b \times C \quad (2.4)$$

Liquid effluent flow paths and release points are indicated in Figure 2.1.

2. Composite Samplers

Effluent pathways, Turbine Sump and Service Water, are equipped with continuous compositors to meet the requirements of Appendix A, Table D-1. These compositors are adjustable and normally set in a time mode and collect three to six samples hourly, 24 hours a day with a total collection of approximately one gallon per day. A representative sample is collected daily from the compositor and saved for the weekly, monthly analysis requirements of Appendix A, Table D-1. In the event that a compositor is not operational, effluent releases via this pathway may continue provided that grab samples are collected and analyzed for gross beta or gamma radioactivity at least once per 24 hours per Appendix A, Table C-1, Action 3.

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3. Post-Release Analysis

A post-release analysis will be done using actual release data to ensure that the limits specified in Section 1 were not exceeded.

A composite list on concentrations (C_i), by isotope, will be used with the actual liquid radwaste (f) and dilution (F) flow rates (or volumes) during the release. The data will be substituted into Equation 2.3 to demonstrate compliance with the limits in Section 1. This data and setpoints will be recorded in auditable records by Plant personnel.

C. DOSE

1. RETS Requirement

Appendix A, Section III.H.1 requires that the quantity of radionuclides released be limited such that the dose or dose commitment to an individual from radioactive materials in liquid effluents release to unrestricted areas from the reactor (see Figure 2-1) will not exceed:

- a. During any calendar quarter, 1.5 mrem to the total body and 5 mrem to any organ, and
- b. During any calendar year, 3 mrem to the total body and 10 mrem to any organ.

To ensure compliance, quantities of activity of each radionuclide released will be summed for each release and accumulated for each quarter as follows in Section 2.

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2. Release Analysis

Calculations shall be performed for each batch release, and weekly for continuous releases according to the formula:

$$\sum_i A_i / C_i \leq 0.5 \quad (2.5)$$

where:

A_i = Cumulative quarterly activity of nuclide i identified in liquid release (C_i).

C_i = Design basis quantity of radionuclide i from Table 2.2.

The design basis quantities are derived in such a conservative manner that doses may be greatly overestimated by this technique. As a consequence of this conservatism, and in light of historically consistent operations with releases well below annual design basis quantities, the Appendix A, effluent requirements do not require monthly dose projections. Instead, if at any time, calculations by Equation (2.5) results in values greater than 0.5 for a given quarter or 1.0 for year-to-date, the NRC LADTAP code will be run to ensure that Appendix A, Section III.H.1 has been met.

Values for the design basis quantities (C_i), and the dose per Curie (D_c/C_c) $_i$ for each nuclide i shown in Table 2.2, were calculated as follows in Sections 2.1 and 2.2.

a. Water Ingestion

The dose to an individual from ingestion of radioactivity from any source as described by the following equation:

$$D_j \sum_{i=1}^i (DCF)_{ij} \times I_i \quad (2.6)$$

where:

D_j = Dose for the j th organ from radionuclides releases, mrem.

j = The organ of interest.

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$(DCF)_{ij}$ = Ingestion dose commitment factor for the j th organ from the i^{th} radionuclide mrem/pCi, see Table 2.1.

I_i = Activity ingested of the i^{th} radionuclide, pCi.

I_i is described by:

$$I_i = \frac{(A_i)(V)(365)}{(1000)(d)} (1E06) \quad (2.7)$$

where:

365 = Days per year.

A_i = Annual activity released of i^{th} radionuclide, μCi .

V = Average rate of water consumption (2000 ml/d - adult, 1400 ml/d - teen and child, 900 ml/d - infant, ICRP 23, p 358).

d = Dilution water flow for year, ml.

1000 = Dispersion factor from discharge to nearest drinking water supply.

1E06 = Conversion μCi to pCi.

The dose equation then becomes:

$$D_j = \frac{(3.65E05)(V)}{d} \sum_{i=1}^i (DCF)_{ij} \times A_i \text{ mrem} \quad (2.8)$$

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b. Fish Ingestion

The dose to an individual from the consumption of fish is described by Equation 2.10. In this case, the activity ingested of the i^{th} radionuclide (I_i) is described by:

$$I_i = \frac{A_i B_i F (1E09)}{15d} = pCi \quad (2.9)$$

where:

A_i = Annual released of i^{th} radionuclide, μCi .

B_i = Fish concentration factor of i^{th} radionuclide $\frac{\mu Ci/gm}{\mu Ci/ml}$
 (see Table 2.0).

F = Amount of fish eaten per year (21 kg adult, 16 kg teen, 6.9 kg child, none infant).

15 = Dispersion factor from discharge to fish exposure point.

d = Dilution water flow for year, ml.

1E09 = Conversion of μCi and Kgm to gross.

Substitution of Equation 2.9 into Equation 2.6 gives:

$$D_j = \frac{(6.7E07)F}{d} \sum_{i=1}^i A_i \times B_i \times DCF_i \text{ mrem} \quad (2.10)$$

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c. Annual Analysis

A complete analysis utilizing the NRC computer code LADTAP with the total source release will be done annually in conjunction with the annual environmental report. This analysis will provide estimates of dose to the total body and various organs in addition to the dose limiting organs considered in the method of Section 2. The following approach is utilized on LADTAP. The dose to the j^{th} organ from m radionuclides, D_j , is described by:

$$\begin{aligned} D_j &= \sum_{i=1}^m D_{ij} \text{ mrem} & (2.11) \\ &= \sum_{i=1}^m (\text{DCF})_{ij} \times I_i \text{ mrem} \end{aligned}$$

where:

- D_j = Dose to the j^{th} organ from the i^{th} radionuclide, mrem.
- j = The organ of interest (bone, GI tract, thyroid, liver, kidney, lung, or total body).
- $(\text{DCF})_{ij}$ = Adult ingestion dose commitment factor for the j^{th} organ from the i^{th} radionuclide, mrem/pCi (see Table 2.1).
- I_i = Activity ingested of the i^{th} radionuclide, μCi .

I_i for water ingestion is described by:

$$I_i = \frac{A_i V_{\Gamma}}{v d} \mu\text{Ci} \quad (2.13)$$

and for fish ingestion I_i is described by:

$$I_i = \frac{A_i B_i F_{\Gamma}}{v d} \mu\text{Ci}$$

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where:

A_j = Activity release of j^{th} radionuclide during the year, μCi .

V = Average rate of water consumption (2000 ml/d).

Γ = Number of days during the year (365 d).

v = Dispersion factor from point of discharge to point of exposure.

d = Dilution water volume (ml).

B_i = Fish concentration factor of the i^{th} radionuclide,

Table 2.0, $\frac{\mu\text{Ci/gm}}{\mu\text{Ci/ml}}$

F = Amount of fish eaten per day (57.5 gm/d).

D. OPERABILITY OF LIQUID RADWASTE EQUIPMENT

The Palisades liquid radwaste system is designed to reduce the radioactive materials in liquid wastes prior to their discharge (by recycle or shipment for disposal) so that radioactivity in liquid effluent releases to unrestricted areas (see Figure 2-1) will not exceed the limits of Appendix A, III.H.1. Maintaining the cumulative fraction if allowable release for each batch release and weekly for continuous releases assures compliance with this requirement. In addition, 13 years of operating experience (to the date this ODCM was first adopted) has shown that design basis quantities never have been exceeded.

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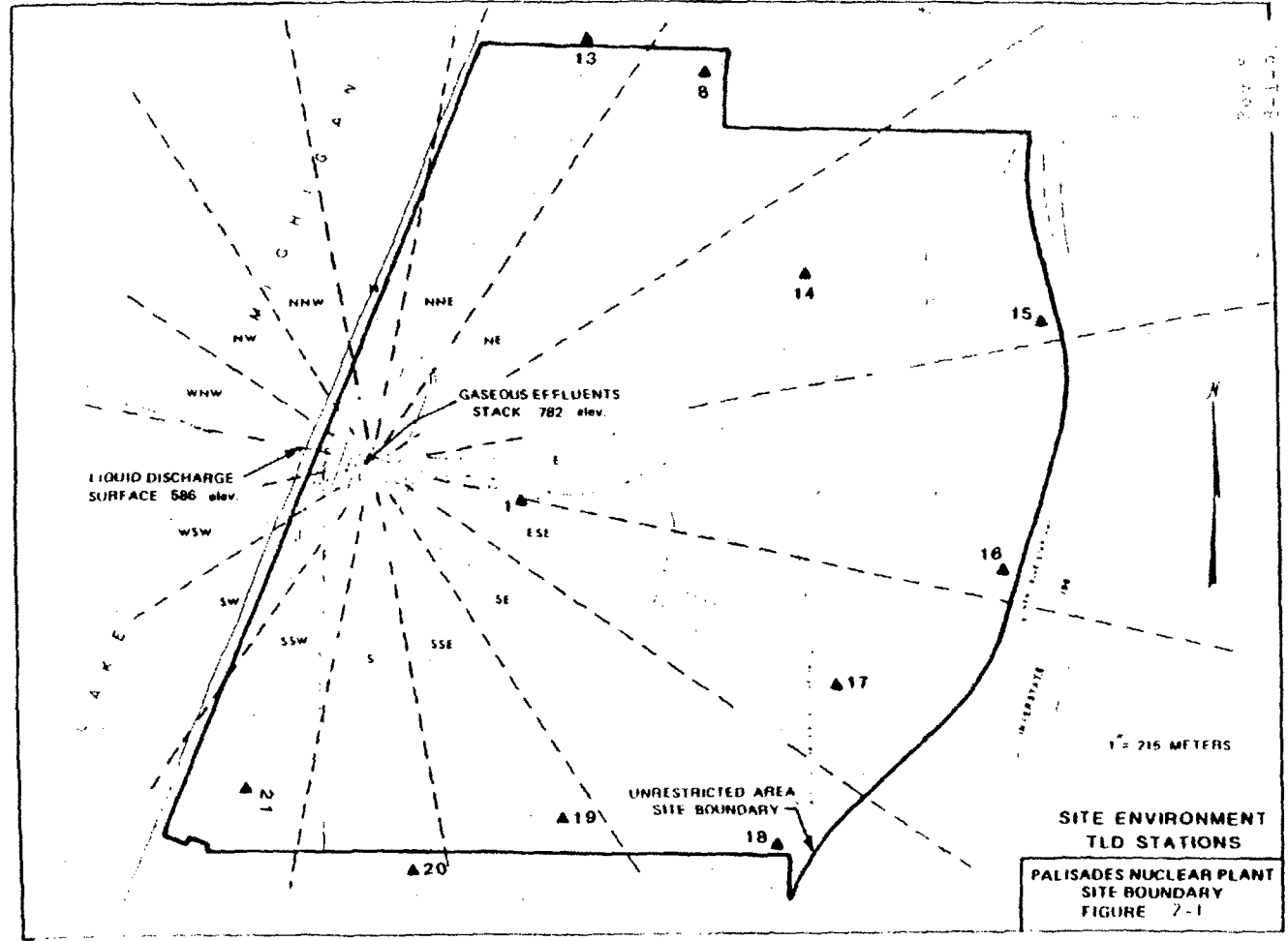
E. RELEASE RATE FOR OFFSITE EC (50 MREM/YR)

10 CFR 20.1302 requires radioactive effluent releases to unrestricted areas be less than the limits specified in Appendix B, Table 2 when averaged over a period not to exceed one year. Concentrations at this Effluent Concentration (EC) level, if ingested for one year, will result in a dose of 50 millirem to the total body. In addition, 10 CFR 50.36a requires that the release of radioactive materials be kept as low as is reasonably achievable. Appendix I to 10 CFR 50 provides the numerical guidelines on limiting conditions for operations to meet the as low as is reasonably achievable requirement.

The LADTAP code has been run to determine the dose due to drinking water at Plant discharge concentration (1,000 x nearest drinking water intake concentration). The nominal average source term used is given in Table 1.1. Dose to the most limiting organ of the person hypothetically drinking this water is 3.88E-03 mrem. This is only 0.13% of the more conservative 50 mrem/yr total body value.

F. FIGURES AND TABLES

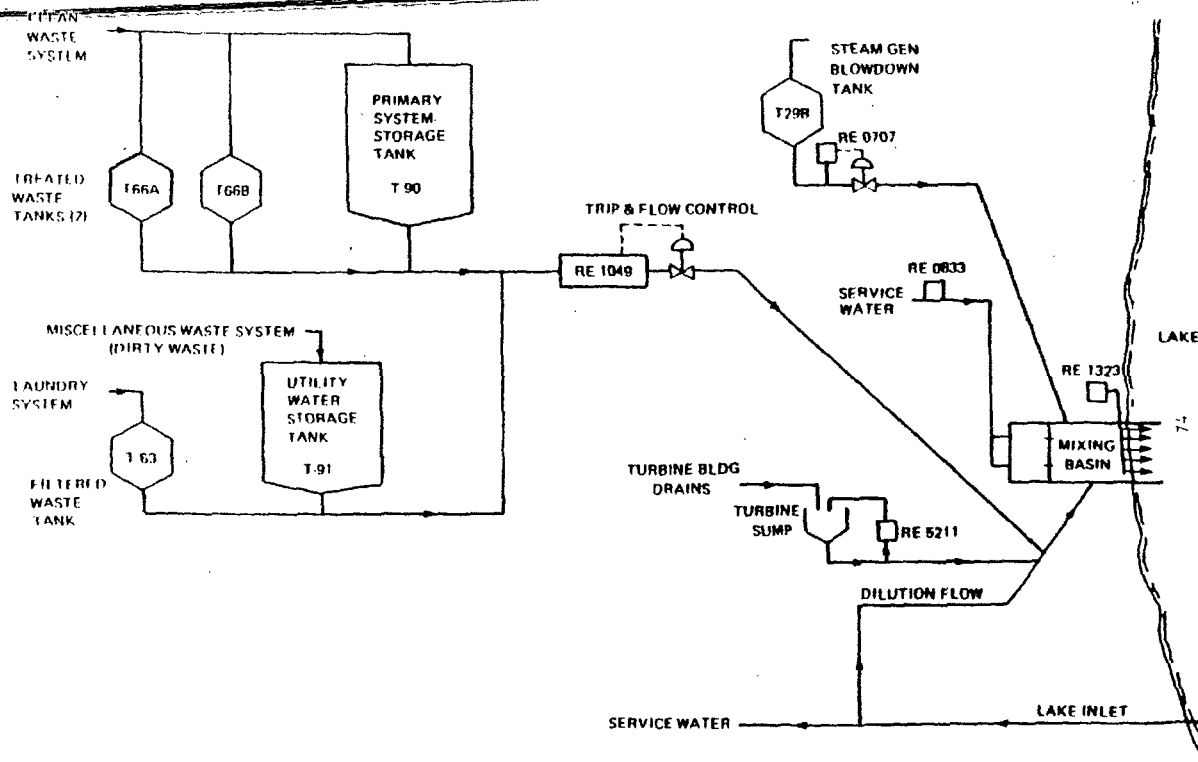
Figure 2-1



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Figure 2-2

PALISADES RADWASTE EFFLUENTS - LIQUID



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TABLE 2.0
BIOACCUMULATION FACTORS
μCi/gm per μCi/ml

<u>ELEMENT</u>	<u>FRESHWATER FISH</u>
H	9.0E-01
C	4.6E 03
NA	1.0E 02
P	1.0E 05
CR	2.0E 02
MN	4.0E 02
FE	1.0E 02
CO	5.0E 01
NI	1.0E 02
CU	5.0E 01
ZN	2.0E 03
BR	4.2E 02
RB	2.0E 03
SR	3.0E 01
Y	2.5E 01
ZR	3.3E 00
NB	3.0E 04
MO	1.0E 01
TC	1.5E 01
RU	1.0E 01
RH	1.0E 01
TE	4.0E 02
I	1.5E 01
CS	2.0E 03
BA	4.0E 00
LA	2.5E 01
CE	1.0E 00
PR	2.5E 01
ND	2.5E 01
W	1.2E 03
NP	1.0E 01

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TABLE 2.1

INFANT INGESTION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INGESTED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
H3	0.	3.08E-07	3.08E-07	3.08E-07	3.08E-07	3.08E-07	3.083-07
BE10	1.71E-05	2.49E-06	5.16E-07	0.	1.64E-06	0.	2.78E-05
C14	2.37E-05	5.06E-06	5.06E-06	5.06E-06	5.06E-06	5.06E-06	5.06E-06
N13	5.85E-08	5.85E-08	5.85E-08	5.835E-08	5.85E-08	5.85E-08	5.85E-08
F18	5.19E-06	0.	4.43E-07	0.	0.	0.	1.22E-06
NA22	9.83E-05	9.83E-05	9.83E-05	9.83E-05	9.83E-05	9.83E-05	9.83E-05
NA24	1.01E-05	1.01E-05	1.01E-05	1.01E-05	1.01E-05	1.01E-05	1.01E-05
P32	1.70E-03	1.00E-04	6.59E-05	0.	0.	0.	2.30E-05
AR39	0.	0.	0.	0.	0.	0.	0.
AR41	0.	0.	0.	0.	0.	0.	0.
CA41	3.74E-04	0.	4.08E-05	0.	0.	0.	1.91E-07
SC46	3.75E-08	5.41E-08	1.69E-08	0.	3.56E-08	0.	3.53E-05
CR51	0.	0.	1.41E-08	9.20E-09	2.01E-09	1.79E-08	4.11E-07
MN54	0.	1.99E-05	4.51E-06	0.	4.41E-06	0.	7.31E-06
MN56	0.	8.18E-07	1.41E-07	0.	7.03E-07	0.	7.43E-05
FE55	1.39E-05	8.98E-06	2.40E-06	0.	0.	4.39E-06	1.14E-06
FE59	3.08E-05	5.38E-05	2.12E-05	0.	0.	1.59E-05	2.57E-05
CO57	0.	1.15E-06	1.87E-06	0.	0.	0.	3.92E-06
CO58	0.	3.60E-06	8.98E-06	0.	0.	0.	8.97E-06
CO60	0.	1.08E-05	2.55E-05	0.	0.	0.	2.57E-05
NI59	4.78E-05	1.45E-05	8.17E-06	0.	0.	0.	7.16E-07
NI63	6.34E-04	3.92E-05	2.20E-05	0.	0.	0.	1.95E-06
NI65	4.70E-06	5.32E-07	2.42E-07	0.	0.	0.	4.05E-05
CU64	0.	6.09E-07	2.82E-07	0.	1.03E-06	0.	1.25E-05
ZN65	1.84E-05	6.31E-05	2.91E-05	0.	3.06E-05	0.	5.33E-05
ZN69M+D	1.50E-06	3.06E-06	2.79E-07	0.	1.24E-06	0.	4.24E-05
ZN69	9.33E-08	1.68E-07	1.25E-08	0.	6.98E-08	0.	1.37E-05
SE79	0.	2.10E-05	3.90E-06	0.	2.43E-05	0.	5.58E-07
BR82	0.	0.	1.27E-05	0.	0.	0.	0.
BR83+D	0.	0.	3.63E-07	0.	0.	0.	0.
BR84	0.	0.	3.82E-07	0.	0.	0.	0.
BR85	0.	0.	1.94E-08	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	0.	0.
KR85M	0.	0.	0.	0.	0.	0.	0.
KR85	0.	0.	0.	0.	0.	0.	0.
KR87	0.	0.	0.	0.	0.	0.	0.
KR88+D	0.	0.	0.	0.	0.	0.	0.
KR89	0.	0.	0.	0.	0.	0.	0.
RB86	0.	1.70E-04	8.40E-05	0.	0.	0.	4.35E-06
RB87	0.	8.88E-05	3.52E-05	0.	0.	0.	5.98E-07
RB88	0.	4.98E-07	2.73E-07	0.	0.	0.	4.85E-07
RB89+D	0.	2.86E-07	1.97E-07	0.	0.	0.	9.74E-08
SR89+D	2.51E-03	0.	7.20E-05	0.	0.	0.	5.16E-05
SR90+D	1.85E-02	0.	4.71E-03	0.	0.	0.	2.31E-04
SR91+D	5.00E-05	0.	1.81E-06	0.	0.	0.	5.92E-05
SR92+D	1.92E-05	0.	7.13E-07	0.	0.	0.	2.07E-04

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TABLE 2.1

INFANT INGESTION DOSE COMMITMENT FACTORS (MREM/50Y PER PCI INGESTED IN FIRST YR)

ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	8.69E-08	0.	2.33E-09	0.	0.	0.	1.20E-04
Y91M+D	8.10E-10	0.	2.76E-11	0.	0.	0.	2.70E-06
Y91	1.13E-06	0.	3.01E-08	0.	0.	0.	8.10E-05
Y92	7.65E-09	0.	2.15E-10	0.	0.	0.	1.46E-04
Y93	2.43E-08	0.	6.62E-10	0.	0.	0.	1.92E-04
ZR93+D	1.93E-07	9.18E-08	5.54E-08	0.	2.71E-07	0.	2.39E-05
ZR95+D	2.06E-07	5.02E-08	3.56E-08	0.	5.41E-08	0.	2.50E-05
ZR97+D	1.48E-08	2.54E-09	1.16E-09	0.	2.56E-09	0.	1.62E-04
NB93M	1.23E-07	3.33E-08	1.04E-08	0.	3.25E-08	0.	3.98E-06
NB95	4.20E-08	1.73E-08	1.00E-08	0.	1.24E-08	0.	1.46E-05
NB97	4.59E-10	9.79E-11	3.53E-11	0.	7.65E-11	0.	3.09E-05
MO93	0.	5.65E-05	1.82E-06	0.	1.13E-05	0.	1.21E-06
MO99+D	0.	3.40E-05	6.63E-06	0.	5.08E-05	0.	1.12E-05
TC99M	1.92E-09	3.96E-09	5.10E-08	0.	4.26E-08	2.07E-09	1.15E-06
TC99	1.08E-06	1.46E-06	4.55E-07	0.	1.23E-05	1.42E-07	6.31E-06
TC101	2.27E-09	2.86E-09	2.83E-08	0.	3.40E-08	1.56E-09	4.86E-07
RU103+D	1.48E-06	0.	4.95E-07	0.	3.08E-06	0.	1.80E-05
RU105+D	1.36E-07	0.	4.58E-08	0.	1.00E-06	0.	5.41E-05
RU106+D	2.41E-05	0.	3.01E-06	0.	2.85E-05	0.	1.83E-04
RH105	1.09E-06	7.13E-07	4.79E-07	0.	1.98E-06	0.	1.77E-05
PD107	0.	1.19E-06	8.45E-08	0.	6.79E-06	0.	9.46E-07
PD109	0.	1.50E-06	3.62E-07	0.	5.51E-06	0.	3.68E-05
AG110M+D	9.96E-07	7.27E-07	4.81E-07	0.	1.04E-06	0.	3.77E-05
AG111	5.20E-07	2.02E-07	1.07E-07	0.	4.22E-07	0.	4.82E-05
CD113M	0.	1.77E-05	6.52E-07	0.	1.34E-05	0.	2.66E-05
CD115M	0.	1.42E-05	4.93E-07	0.	7.41E-06	0.	8.09E-05
SN123	2.49E-04	3.89E-06	6.50E-06	3.91E-06	0.	0.	6.58E-05
SN125+D	7.41E-05	1.38E-06	3.29E-06	1.36E-06	0.	0.	1.11E-04
SN126+D	5.53E-04	7.26E-06	1.80E-05	1.91E-06	0.	0.	2.52E-05
SB124	2.14E-05	3.15E-07	6.63E-06	5.68E-08	0.	1.34E-05	6.60E-05
SB125+D	1.23E-05	1.19E-07	2.53E-06	1.54E-08	0.	7.72E-06	1.64E-05
SB126	8.06E-06	1.58E-07	2.91E-06	6.19E-08	0.	5.07E-06	8.35E-05
SB127	2.23E-06	3.98E-08	6.90E-07	2.84E-08	0.	1.15E-06	5.91E-05
TE125M	2.33E-05	7.79E-06	3.15E-06	7.84E-06	0.	0.	1.11E-05
TE127M+D	5.85E-05	1.94E-05	7.08E-06	1.69E-05	1.44E-04	0.	2.36E-05
TE127	1.00E-06	3.35E-07	2.15E-07	8.14E-07	2.44E-06	0.	2.10E-05
TE129M+D	1.00E-04	3.43E-05	1.54E-05	3.84E-05	2.50E-04	0.	5.97E-05
TE129	2.84E-07	9.79E-08	6.63E-08	2.38E-07	7.07E-07	0.	2.27E-05
TE131M+D	1.52E-05	6.12E-06	5.05E-06	1.24E-05	4.21E-05	0.	1.03E-04
TE131+D	1.76E-07	6.50E-08	4.94E-08	1.57E-07	4.50E-07	0.	7.11E-06
TE132+D	2.08E-05	1.03E-05	9.61E-06	1.52E-05	6.44E-05	0.	3.81E-05
TE133M+D	3.91E-07	1.79E-07	1.71E-07	3.45E-07	1.22E-06	0.	1.93E-05
TE134+D	2.67E-07	1.34E-07	1.38E-07	2.39E-07	9.03E-07	0.	3.06E-06
I129	2.86E-05	2.12E-05	1.55E-05	1.36E-02	2.51E-05	0.	4.24E-07
I130	6.00E-06	1.32E-05	5.30E-06	1.48E-03	1.45E-05	0.	2.83E-06
I131+D	3.59E-05	4.23E-05	1.86E-05	1.39E-02	4.94E-05	0.	1.51E-06

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I132	1.66E-06	3.37E-06	1.20E-06	1.58E-04	3.76E-06	0.	2.73E-06
I133+D	1.25E-05	1.82E-05	5.33E-06	3.31E-03	2.14E-05	0.	3.08E-06
I134	8.69E-07	1.78E-06	6.33E-07	4.15E-05	1.99E-06	0.	1.84E-06
I135+D	3.64E-06	7.24E-06	2.64E-06	6.49E-04	8.07E-06	0.	2.62E-06
XE131M	0.	0.	0.	0.	0.	0.	0.
XE133M	0.	0.	0.	0.	0.	0.	0.
XE133	0.	0.	0.	0.	0.	0.	0.
XE135M	0.	0.	0.	0.	0.	0.	0.
XE135	0.	0.	0.	0.	0.	0.	0.
XE137	0.	0.	0.	0.	0.	0.	0.
XE138+D	0.	0.	0.	0.	0.	0.	0.
CS134M+D	1.76E-07	2.93E-07	1.48E-07	0.	1.13E-07	2.60E-08	2.32E-07
CS134	3.77E-04	7.03E-04	7.10E-05	0.	1.81E-04	7.42E-05	1.91E-06
CS135	1.33E-04	1.21E-04	6.30E-06	0.	3.44E-05	1.31E-05	4.37E-07
CS136	4.59E-05	1.35E-04	5.04E-05	0.	5.38E-05	1.10E-05	2.05E-06
CS137+D	5.22E-04	6.11E-04	4.33E-05	0.	1.64E-04	6.64E-05	1.91E-06
CS138	4.81E-07	7.82E-07	3.79E-07	0.	3.90E-07	6.09E-08	1.25E-06
CS139+D	3.10E-07	4.24E-07	1.62E-07	0.	2.19E-07	3.30E-08	2.66E-08
BA139	8.81E-07	5.84E-10	2.55E-08	0.	3.51E-10	3.54E-10	5.58E-05
BA140+D	1.71E-04	1.71E-07	8.81E-06	0.	4.06E-08	1.05E-07	4.20E-05
BA141+D	4.25E-07	2.91E-10	1.34E-08	0.	1.75E-10	1.77E-10	5.19E-06
BA142+D	1.84E-07	1.53E-10	9.06E-09	0.	8.81E-11	9.26E-11	7.59E-07
LA140	2.11E-08	8.32E-09	2.14E-09	0.	0.	0.	9.77E-05
LA141	2.89E-09	8.38E-10	1.46E-10	0.	0.	0.	9.61E-05
LA142	1.10E-09	4.04E-10	9.67E-11	0.	0.	0.	6.86E-05
CE141	7.87E-08	4.80E-08	5.65E-09	0.	1.48E-08	0.	2.48E-05
CE143+D	1.48E-08	9.82E-06	1.12E-09	0.	2.86E-09	0.	5.73E-05
CE144+D	2.98E-06	1.22E-06	1.67E-07	0.	4.93E-07	0.	1.71E-04
PR143	8.18E-08	3.04E-08	4.03E-09	0.	1.13E-08	0.	4.29E-05
PR144	2.74E-10	1.06E-10	1.38E-11	0.	3.84E-11	0.	4.93E-06
ND147+D	5.53E-08	5.68E-08	3.48E-09	0.	2.19E-08	0.	3.60E-05
PM147	3.88E-07	3.27E-08	1.59E-08	0.	4.88E-08	0.	9.27E-06
PM148M+D	1.65E-07	4.18E-08	3.28E-08	0.	4.80E-08	0.	5.44E-05
PM148	6.32E-08	9.13E-09	4.60E-09	0.	1.09E-08	0.	9.74E-05
PM149	1.38E-08	1.81E-09	7.90E-10	0.	2.20E-09	0.	4.86E-05
PM151	6.18E-09	9.01E-10	4.56E-10	0.	1.07E-09	0.	4.17E-05
SM151	2.90E-07	6.67E-08	1.44E-08	0.	4.53E-08	0.	5.58E-06
SM153	7.72E-09	5.97E-09	4.58E-10	0.	1.25E-09	0.	3.12E-05
EU152	6.74E-07	1.79E-07	1.51E-07	0.	5.02E-07	0.	1.59E-05
EU154	2.64E-06	3.67E-07	2.20E-07	0.	9.95E-07	0.	4.58E-05
EU155	5.42E-07	6.25E-08	3.23E-08	0.	1.40E-07	0.	8.37E-05
EU156	1.14E-07	7.06E-08	1.12E-08	0.	3.26E-08	0.	6.67E-05
TB160	2.59E-07	0.	3.24E-08	0.	7.37E-08	0.	3.45E-05
HO166M	1.25E-06	2.69E-07	2.13E-07	0.	3.57E-07	0.	0.
W181	8.85E-08	2.72E-08	3.04E-09	0.	0.	0.	3.82E-07
W185	3.62E-06	1.13E-06	1.29E-07	0.	0.	0.	1.62E-05
W187	9.03E-07	6.28E-07	2.17E-07	0.	0.	0.	3.69E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	5.28E-02	1.42E-02	2.38E-03	0.	4.33E-02	0.	5.62E-05
BI210+D	4.16E-06	2.68E-05	3.58E-07	0.	2.08E-04	0.	5.27E-05
PO210	3.10E-03	5.93E-03	7.41E-04	0.	1.26E-02	0.	6.61E-05
RN222+D	0.	0.	0.	0.	0.	0.	0.
RA223+D	4.41E-02	6.42E-05	8.82E-03	0.	1.17E-03	0.	3.43E-04
RA224+D	1.46E-02	3.29E-05	2.91E-03	0.	6.00E-04	0.	3.86E-04
RA225+D	5.78E-02	6.42E-05	1.15E-02	0.	1.19E-03	0.	3.24E-04
RA226+D	6.20E-01	4.76E-05	5.14E-01	0.	8.71E-04	0.	3.44E-04
RA228+D	4.32E-01	2.58E-05	4.86E-01	0.	4.73E-04	0.	5.86E-05
AC225	3.92E-05	5.03E-05	2.63E-06	0.	3.69E-06	0.	4.36E-04
AC227+D	4.49E-03	7.67E-04	2.79E-04	0.	1.56E-04	0.	8.50E-05
TH227+D	1.20E-04	2.01E-06	3.45E-06	0.	7.41E-06	0.	5.70E-04
TH228+D	2.47E-03	3.38E-05	8.36E-05	0.	1.58E-04	0.	5.84E-04
TH229	1.48E-02	1.94E-04	7.29E-04	0.	9.29E-04	0.	5.31E-04
TH230	3.80E-03	1.90E-04	1.06E-04	0.	9.12E-04	0.	6.24E-05
TH232+D	4.24E-03	1.63E-04	1.65E-04	0.	7.79E-04	0.	5.31E-05
TH234	6.92E-07	3.77E-08	2.00E-08	0.	1.39E-07	0.	1.19E-04
PA231+D	7.57E-03	2.50E-04	3.02E-04	0.	1.34E-03	0.	7.44E-05
PA233	3.11E-08	6.09E-09	5.43E-09	0.	1.67E-08	0.	1.46E-05
U232+D	2.42E-02	0.	2.16E-03	0.	2.37E-03	0.	7.04E-05
U233+D	5.08E-03	0.	3.87E-04	0.	1.08E-03	0.	6.51E-05
U234	4.88E-03	0.	3.80E-04	0.	1.06E-03	0.	6.37E-05
U235+D	4.67E-03	0.	3.56E-04	0.	9.93E-04	0.	8.10E-05
U236	4.67E-03	0.	3.64E-04	0.	1.01E-03	0.	5.98E-05
U237	4.95E-07	0.	1.32E-07	0.	1.23E-06	0.	2.11E-05
U238+D	4.47E-03	0.	3.33E-04	0.	9.28E-04	0.	5.71E-05
NP237+D	2.53E-03	1.93E-04	1.05E-04	0.	6.34E-04	0.	8.23E-05
NP238	1.24E-07	3.12E-09	1.92E-09	0.	6.81E-09	0.	4.17E-05
NP239	1.11E-08	9.93E-10	5.61E-10	0.	1.98E-09	0.	2.87E-05
PU238	1.34E-03	1.69E-04	3.40E-05	0.	1.21E-04	0.	7.57E-05
PU239	1.45E-03	1.77E-04	3.54E-05	0.	1.28E-04	0.	6.91E-05
PU240	1.45E-03	1.77E-04	3.54E-05	0.	1.28E-04	0.	7.04E-05
PU241+D	4.38E-05	1.90E-06	8.82E-07	0.	3.17E-06	0.	1.45E-06
PU242	1.35E-03	1.70E-04	3.41E-05	0.	1.23E-04	0.	6.77E-05
PU244	1.57E-03	1.95E-04	3.91E-05	0.	1.41E-04	0.	1.01E-04
AM241	1.53E-03	7.18E-04	1.09E-04	0.	6.55E-04	0.	7.70E-05
AM242M	1.58E-03	7.02E-04	1.13E-04	0.	6.64E-04	0.	9.69E-05
AM243	1.51E-03	6.88E-04	1.06E-04	0.	6.36E-04	0.	9.03E-05
CM242	1.37E-04	1.24E-04	9.10E-06	0.	2.62E-05	0.	8.23E-05
CM243	1.45E-03	6.88E-04	8.98E-05	0.	3.27E-04	0.	8.10E-05
CM244	1.22E-03	6.16E-04	7.59E-05	0.	2.71E-04	0.	7.84E-05
CM245	1.88E-03	7.49E-04	1.13E-04	0.	4.32E-04	0.	7.30E-05
CM246	1.87E-03	7.49E-04	1.13E-04	0.	4.31E-04	0.	7.17E-05
CM247+D	1.82E-03	7.36E-04	1.11E-04	0.	4.24E-04	0.	9.43E-05
CM248	1.51E-02	6.07E-03	9.16E-04	0.	3.50E-03	0.	1.52E-03
CF252	1.24E-03	0.	2.95E-05	0	0.	0.	2.99E-04

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H3	0.	2.03E-07	2.03E-07	2.03E-07	2.03E-07	2.03E-07	2.03E-07
BE10	1.35E-05	1.57E-06	3.39E-07	0.	1.11E-06	0.	2.75E-05
C14	1.21E-05	2.42E-06	2.42E-06	2.42E-06	2.42E-06	2.42E-06	2.42E-06
N13	3.10E-08	3.10E-08	3.10E-08	3.10E-08	3.10E-08	3.10E-08	3.10E-08
F18	2.49E-06	0.	2.47E-07	0.	0.	0.	6.74E-07
NA22	5.88E-05	5.88E-05	5.88E-05	5.88E-05	5.88E-05	5.88E-05	5.88E-05
NA24	5.80E-06	5.80E-06	5.80E-06	5.80E-06	5.80E-06	5.80E-06	5.80E-06
P32	8.25E-04	3.86E-05	3.18E-05	0.	0.	0.	2.28E-05
AR39	0.	0.	0.	0.	0.	0.	0.
AR41	0.	0.	0.	0.	0.	0.	0.
CA41	3.47E-04	0.	3.79E-05	0.	0.	0.	1.90E-07
SC46	1.97E-08	2.70E-08	1.04E-08	0.	2.30E-08	0.	3.95E-05
CR51	0.	0.	8.90E-09	4.94E-09	1.35E-09	9.02E-09	4.72E-07
MN54	0.	1.07E-05	2.85E-06	0.	3.00E-06	0.	8.98E-06
MN56	0.	3.34E-07	7.54E-08	0.	4.04E-07	0.	4.84E-05
FE55	1.15E-05	6.10E-06	1.89E-06	0.	0.	3.45E-06	1.13E-06
FE59	1.65E-05	2.67E-05	1.33E-05	0.	0.	7.74E-06	2.78E-05
CO57	0.	4.93E-07	9.98E-07	0.	0.	0.	4.04E-06
CO58	0.	1.80E-06	5.51E-06	0.	0.	0.	1.05E-05
CO60	0.	5.29E-06	1.56E-05	0.	0.	0.	2.93E-05
NI59	4.02E-05	1.07E-05	6.82E-06	0.	0.	0.	7.10E-07
NI63	5.38E-04	2.88E-05	1.83E-05	0.	0.	0.	1.94E-06
NI65	2.22E-06	2.09E-07	1.22E-07	0.	0.	0.	2.56E-05
CU64	0.	2.45E-07	1.48E-07	0.	5.92E-07	0.	1.15E-05
ZN65	1.37E-05	3.65E-05	2.27E-05	0.	2.30E-05	0.	6.41E-06
ZN69M+D	7.10E-07	1.21E-06	1.43E-07	0.	7.03E-07	0.	3.94E-05
ZN69	4.38E-08	6.33E-08	5.85E-09	0.	3.84E-08	0.	3.99E-06
SE79	0.	8.43E-06	1.87E-06	0.	1.37E-05	0.	5.53E-07
BR82	0.	0.	7.55E-06	0.	0.	0.	0.
BR83+D	0.	0.	1.71E-07	0.	0.	0.	0.
BR84	0.	0.	1.98E-07	0.	0.	0.	0.
BR85	0.	0.	9.12E-09	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	0.	0.
KR85M	0.	0.	0.	0.	0.	0.	0.
KR85	0.	0.	0.	0.	0.	0.	0.
KR87	0.	0.	0.	0.	0.	0.	0.
KR88+D	0.	0.	0.	0.	0.	0.	0.
KR89	0.	0.	0.	0.	0.	0.	0.
RB86	0.	6.70E-05	4.12E-05	0.	0.	0.	4.31E-06
RB87	0.	3.95E-05	1.83E-05	0.	0.	0.	5.92E-07
RB88	0.	1.90E-07	1.32E-07	0.	0.	0.	9.32E-09
RB89+D	0.	1.17E-07	1.04E-07	0.	0.	0.	1.02E-09
SR89+D	1.32E-03	0.	3.77E-05	0.	0.	0.	5.11E-05
SR90+D	1.70E-02	0.	4.31E-03	0.	0.	0.	2.29E-04
SR91+D	2.40E-05	0.	9.06E-07	0.	0.	0.	5.30E-05
SR92+D	9.03E-06	0.	3.62E-07	0.	0.	0.	1.71E-04

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Y90	4.11E-08	0.	1.10E-09	0.	0.	0.	1.17E-04
Y91M+D	3.82E-10	0.	1.39E-11	0.	0.	0.	7.48E-07
Y91	6.02E-07	0.	1.61E-08	0.	0.	0.	8.02E-05
Y92	3.60E-09	0.	1.03E-10	0.	0.	0.	1.04E-04
Y93	1.14E-08	0.	3.13E-10	0.	0.	0.	1.70E-04
ZR93+D	1.67E-07	6.25E-08	4.45E-08	0.	2.42E-07	0.	2.37E-05
ZR95+D	1.16E-07	2.55E-08	2.27E-08	0.	3.65E-08	0.	2.66E-05
ZR97+D	6.99E-09	1.01E-09	5.96E-10	0.	1.45E-09	0.	1.53E-04
NB93M	1.05E-07	2.62E-08	8.61E-09	0.	2.83E-08	0.	3.95E-06
NB95	2.25E-08	8.76E-09	6.26E-09	0.	8.23E-09	0.	1.62E-05
NB97	2.17E-10	3.92E-11	1.83E-11	0.	4.35E-11	0.	1.21E-05
MO93	0.	2.41E-05	8.65E-07	0.	6.35E-06	0.	1.22E-06
MO99+D	0.	1.33E-05	3.29E-06	0.	2.84E-05	0.	1.10E-05
TC99M	9.23E-10	1.81E-09	3.00E-08	0.	2.63E-08	9.19E-10	1.03E-06
TC99	5.35E-07	5.96E-07	2.14E-07	0.	7.02E-06	5.27E-08	6.25E-06
TC101	1.07E-09	1.12E-09	1.42E-08	0.	1.91E-08	5.92E-10	3.56E-09
RU103+D	7.31E-07	0.	2.81E-07	0.	1.84E-06	0.	1.89E-05
RU105+D	6.45E-08	0.	2.34E-08	0.	5.67E-07	0.	4.21E-05
RU106+D	1.17E-05	0.	1.46E-06	0.	1.58E-05	0.	1.82E-04
RH105	5.14E-07	2.76E-07	2.36E-07	0.	1.10E-06	0.	1.71E-05
PD107	0.	4.72E-07	4.01E-08	0.	3.95E-06	0.	9.37E-07
PD109	0.	5.67E-07	1.70E-07	0.	3.04E-06	0.	3.35E-05
AG110M+D	5.39E-07	3.64E-07	2.91E-07	0.	6.78E-07	0.	4.33E-05
AG111	2.48E-07	7.76E-08	5.12E-08	0.	2.34E-07	0.	4.75E-05
CD113M	0.	1.02E-05	4.34E-07	0.	1.05E-05	0.	2.63E-05
CD115M	0.	5.89E-06	2.51E-07	0.	4.38E-06	0.	8.01E-05
SN123	1.33E-04	1.65E-06	3.24E-06	1.75E-06	0.	0.	6.52E-05
SN125+D	3.55E-05	5.35E-07	1.59E-06	5.55E-07	0.	0.	1.10E-04
SN126+D	3.33E-04	4.15E-06	9.46E-06	1.14E-06	0.	0.	2.50E-05
SB124	1.11E-05	1.44E-07	3.89E-06	2.45E-08	0.	6.16E-06	6.94E-05
SB125+D	7.16E-06	5.52E-08	1.50E-06	6.63E-09	0.	3.99E-06	1.71E-05
SB126	4.40E-06	6.73E-08	1.58E-06	2.58E-08	0.	2.10E-06	8.87E-05
SB127	1.06E-06	1.64E-08	3.68E-07	1.18E-08	0.	4.60E-07	5.97E-05
TE125M	1.14E-05	3.09E-06	1.52E-06	3.20E-06	0.	0.	1.10E-05
TE127M+D	2.89E-05	7.78E-06	3.43E-06	6.91E-06	8.24E-05	0.	2.34E-05
TE127	4.71E-07	1.27E-07	1.01E-07	3.26E-07	1.34E-06	0.	1.84E-05
TE129M+D	4.87E-05	1.36E-05	7.56E-06	1.57E-05	1.43E-04	0.	5.94E-05
TE129	1.34E-07	3.74E-08	3.18E-08	9.56E-08	3.92E-07	0.	8.34E-06
TE131M+D	7.20E-06	2.49E-06	2.65E-06	5.12E-06	2.41E-05	0.	1.01E-04
TE131+D	8.30E-08	2.53E-08	2.47E-08	6.35E-08	2.51E-07	0.	4.36E-07
TE132+D	1.01E-05	4.47E-06	5.40E-06	6.51E-06	4.15E-05	0.	4.50E-05
TE133M+D	1.87E-07	7.56E-08	9.37E-08	1.45E-07	7.18E-07	0.	5.77E-06
TE134+D	1.29E-07	5.80E-08	7.74E-08	1.02E-07	5.37E-07	0.	5.89E-07
I129	1.39E-05	8.53E-06	7.62E-06	5.58E-03	1.44E-05	0.	4.29E-07
I130	2.92E-06	5.90E-06	3.04E-06	6.50E-04	8.82E-06	0.	2.76E-06
I131+D	1.72E-05	1.73E-05	9.83E-06	5.72E-03	2.84E-05	0.	1.54E-06

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I132	8.00E-07	1.47E-06	6.76E-07	6.82E-05	2.25E-06	0.	1.73E-06
I133+D	5.92E-06	7.32E-06	2.77E-06	1.36E-03	1.22E-05	0.	2.95E-06
I134	4.19E-07	7.78E-07	3.58E-07	1.79E-05	1.19E-06	0.	5.16E-07
I135+D	1.75E-06	3.15E-06	1.49E-06	2.79E-04	4.83E-06	0.	2.40E-06
XE131M	0.	0.	0.	0.	0.	0.	0.
XE133M	0.	0.	0.	0.	0.	0.	0.
XE133	0.	0.	0.	0.	0.	0.	0.
XE135M	0.	0.	0.	0.	0.	0.	0.
XE135	0.	0.	0.	0.	0.	0.	0.
XE137	0.	0.	0.	0.	0.	0.	0.
XE138+D	0.	0.	0.	0.	0.	0.	0.
CS134M+D	8.44E-08	1.25E-07	8.16E-08	0.	6.59E-08	1.09E-08	1.58E-07
CS134	2.34E-04	3.84E-04	8.10E-05	0.	1.19E-04	4.27E-05	2.07E-06
CS135	8.30E-05	5.78E-05	5.93E-06	0.	2.04E-05	6.81E-06	4.33E-07
CS136	2.35E-05	6.46E-05	4.18E-05	0.	3.44E-05	5.13E-06	2.27E-06
CS137+D	3.27E-04	3.13E-04	4.62E-05	0.	1.02E-04	3.67E-05	1.96E-06
CS138	2.28E-07	3.17E-07	2.01E-07	0.	2.23E-07	2.40E-08	1.46E-07
CS139+D	1.45E-07	1.61E-07	7.74E-08	0.	1.21E-07	1.22E-08	1.45E-11
BA139	4.14E-07	2.21E-10	1.20E-08	0.	1.93E-10	1.30E-10	2.39E-05
BA140+D	8.31E-05	7.28E-08	4.85E-06	0.	2.37E-08	4.34E-08	4.21E-05
BA141+D	2.00E-07	1.12E-10	6.51E-09	0.	9.69E-11	6.58E-10	1.14E-07
BA142+D	8.74E-08	6.29E-11	4.88E-09	0.	5.09E-11	3.70E-11	1.14E-09
LA140	1.01E-08	3.53E-09	1.19E-09	0.	0.	0.	9.84E-05
LA141	1.35E-09	3.17E-10	6.88E-11	0.	0.	0.	7.05E-05
LA142	5.24E-10	1.67E-10	5.23E-11	0.	0.	0.	3.31E-05
CE141	3.97E-08	1.98E-08	2.94E-09	0.	8.68E-09	0.	2.47E-05
CE143+D	6.99E-09	3.79E-06	5.49E-10	0.	1.59E-09	0.	5.55E-05
CE144+D	2.08E-06	6.52E-07	1.11E-07	0.	3.61E-07	0.	1.70E-04
PR143	3.93E-08	1.18E-08	1.95E-09	0.	6.39E-09	0.	4.24E-05
PR144	1.29E-10	3.99E-11	6.49E-12	0.	2.11E-11	0.	8.59E-08
ND147+D	2.79E-08	2.26E-08	1.75E-09	0.	1.24E-08	0.	3.58E-05
PM147	3.18E-07	2.27E-08	1.22E-08	0.	4.01E-08	0.	9.19E-06
PM148M+D	1.03E-07	2.05E-08	2.05E-08	0.	3.04E-08	0.	5.78E-05
PM148	3.02E-08	3.63E-09	2.35E-09	0.	6.17E-09	0.	9.70E-05
PM149	6.49E-09	6.90E-10	3.74E-10	0.	1.22E-09	0.	4.71E-05
PM151	2.92E-09	3.55E-10	2.31E-10	0.	6.02E-10	0.	4.03E-05
SM151	2.56E-07	3.81E-08	1.20E-08	0.	3.94E-08	0.	5.53E-06
SM153	3.65E-09	2.27E-09	2.19E-10	0.	6.91E-10	0.	3.02E-05
EU152	6.15E-07	1.12E-07	1.33E-07	0.	4.73E-07	0.	1.84E-05
EU154	2.30E-06	2.07E-07	1.89E-07	0.	9.09E-07	0.	4.81E-05
EU155	4.82E-07	3.47E-08	2.72E-08	0.	1.30E-07	0.	8.69E-05
EU156	5.62E-08	3.01E-08	6.23E-09	0.	1.94E-08	0.	6.83E-05
TB160	1.66E-07	0.	2.06E-08	0.	4.94E-08	0.	3.68E-05
HO166M	1.08E-06	2.26E-07	1.91E-07	0.	3.22E-07	0.	0.
W181	4.23E-06	1.04E-08	1.43E-09	0.	0.	0.	3.79E-07
W185	1.73E-06	4.32E-07	6.05E-08	0.	0.	0.	1.61E-05
W187	4.29E-07	2.54E-07	1.14E-07	0.	0.	0.	3.57E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	4.75E-02	1.22E-02	2.09E-03	0.	3.67E-02	0.	5.57E-05
BI210+D	1.97E-06	1.02E-05	1.69E-07	0.	1.15E-04	0.	5.17E-05
PO210	1.52E-03	2.43E-03	3.67E-04	0.	7.56E-03	0.	6.55E-05
RN222+D	0.	0.	0.	0.	0.	0.	0.
RA223+D	2.12E-02	2.45E-05	4.24E-03	0.	6.50E-04	0.	3.38E-04
RA224+D	6.89E-03	1.25E-05	1.38E-03	0.	3.31E-04	0.	3.78E-04
RA225+D	2.80E-02	2.50E-05	5.59E-03	0.	6.62E-04	0.	3.21E-04
RA226+D	5.75E-01	1.84E-05	4.72E-01	0.	4.88E-04	0.	3.41E-04
RA228+D	3.85E-01	9.99E-06	4.32E-01	0.	2.65E-04	0.	5.81E-05
AC225	1.88E-05	1.94E-05	1.26E-06	0.	2.07E-06	0.	4.31E-04
AC227+D	4.12E-03	6.63E-04	2.55E-04	0.	1.46E-04	0.	8.43E-05
TH227+D	5.85E-05	7.96E-07	1.69E-06	0.	4.22E-06	0.	5.63E-04
TH228+D	2.07E-03	2.65E-05	7.00E-05	0.	1.38E-04	0.	5.79E-04
TH229	1.38E-02	1.81E-04	6.80E-04	0.	8.84E-04	0.	5.27E-04
TH230	3.55E-03	1.78E-04	9.91E-05	0.	8.67E-04	0.	6.19E-05
TH232+D	3.96E-03	1.52E-04	3.01E-04	0.	7.41E-04	0.	5.27E-05
TH234	3.42E-07	1.51E-08	9.88E-09	0.	8.01E-08	0.	1.18E-04
PA231+D	7.07E-03	2.34E-04	2.81E-04	0.	1.28E-03	0.	7.37E-05
PA233	1.81E-08	2.82E-09	3.16E-09	0.	1.04E-08	0.	1.44E-05
U232+D	1.76E-02	0.	1.26E-03	0.	1.34E-03	0.	6.98E-05
U233+D	3.72E-03	0.	2.25E-04	0.	6.10E-04	0.	6.45E-05
U234	3.57E-03	0.	2.21E-04	0.	5.98E-04	0.	6.32E-05
U235+D	3.42E-03	0.	2.07E-04	0.	5.61E-04	0.	8.03E-05
U236	3.42E-03	0.	2.12E-04	0.	5.73E-04	0.	5.92E-05
U237	2.36E-07	0.	6.27E-08	0.	6.81E-07	0.	2.08E-05
U238+D	3.27E-03	0.	1.94E-04	0.	5.24E-04	0.	5.66E-05
NP237+D	2.36E-03	1.81E-04	9.79E-05	0.	6.05E-04	0.	8.16E-05
NP238	5.83E-08	1.18E-09	9.08E-10	0.	3.76E-09	0.	4.04E-05
NP239	5.25E-09	3.77E-10	2.65E-10	0.	1.09E-09	0.	2.79E-05
PU238	1.25E-03	1.56E-04	3.16E-05	0.	1.15E-04	0.	7.50E-05
PU239	1.36E-03	1.65E-04	3.31E-05	0.	1.22E-04	0.	6.85E-05
PU240	1.36E-03	1.65E-04	3.31E-05	0.	1.22E-04	0.	6.98E-05
PU241+D	4.00E-05	1.72E-06	8.04E-07	0.	2.96E-06	0.	1.44E-06
PU242	1.26E-03	1.59E-04	3.19E-05	0.	1.17E-04	0.	6.71E-05
PU244	1.47E-03	1.82E-04	3.65E-05	0.	1.35E-04	0.	1.00E-04
AM241	1.43E-03	6.40E-04	1.02E-04	0.	6.23E-04	0.	7.64E-05
AM242M	1.47E-03	6.25E-04	1.04E-04	0.	6.30E-04	0.	9.61E-05
AM243	1.41E-03	6.14E-04	9.83E-05	0.	6.06E-04	0.	8.95E-05
CM242	8.80E-05	6.73E-05	5.84E-06	0.	1.87E-05	0.	8.16E-05
CM243	1.33E-03	6.03E-04	8.24E-05	0.	3.08E-04	0.	8.03E-05
CM244	1.11E-03	5.36E-04	6.93E-05	0.	2.54E-04	0.	7.77E-05
CM245	1.76E-03	6.64E-04	1.05E-04	0.	4.11E-04	0.	7.24E-05
CM246	1.74E-03	6.64E-04	1.05E-04	0.	4.10E-04	0.	7.11E-05
CM247+D	1.70E-03	6.53E-04	1.03E-04	0.	4.04E-04	0.	9.35E-05
CM248	1.41E-02	5.38E-03	8.52E-04	0.	3.33E-03	0.	1.51E-03
CF252	1.07E-03	0.	2.54E-05	0.	0.	0.	2.96E-04

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
H3	0.	1.06E-07	1.06E-07	1.06E-07	1.06E-07	1.06E-07	1.06E-07
BE10	4.48E-06	6.94E-07	1.13E-07	0.	5.30E-07	0.	2.84E-05
C14	4.06E-06	8.12E-07	8.12E-07	8.12E-07	8.12E-07	8.12E-07	8.12E-07
N13	1.15E-08	1.15E-08	1.15E-08	1.15E-08	1.15E-08	1.15E-08	1.15E-08
F18	8.64E-07	0.	9.47E-08	0.	0.	0.	7.78E-08
NA22	2.34E-05	2.34E-05	2.34E-05	2.34E-05	2.34E-05	2.34E-05	2.34E-05
NA24	2.30E-06	2.30E-06	2.30E-06	2.30E-06	2.30E-06	2.30E-06	2.30E-06
P32	2.76E-04	1.71E-05	1.07E-05	0.	0.	0.	2.32E-05
AR39	0.	0.	0.	0.	0.	0.	0.
AR41	0.	0.	0.	0.	0.	0.	0.
CA41	1.97E-04	0.	2.13E-05	0.	0.	0.	1.95E-07
SC46	7.24E-09	1.41E-08	4.18E-09	0.	1.35E-08	0.	4.80E-05
CR51	0.	0.	3.60E-09	2.00E-09	7.89E-10	5.14E-09	6.05E-07
MN54	0.	5.90E-06	1.17E-06	0.	1.76E-06	0.	1.21E-05
MN56	0.	1.58E-07	2.81E-08	0.	2.00E-07	0.	1.04E-05
FE55	3.78E-06	2.68E-06	6.25E-07	0.	0.	1.70E-06	1.16E-06
FE59	5.87E-06	1.37E-05	5.29E-06	0.	0.	4.32E-06	3.24E-05
CO57	0.	2.38E-07	3.99E-07	0.	0.	0.	4.44E-06
CO58	0.	9.72E-07	2.24E-06	0.	0.	0.	1.34E-05
CO60	0.	2.81E-06	6.33E-06	0.	0.	0.	3.66E-05
NI59	1.32E-05	4.66E-06	2.24E-06	0.	0.	0.	7.31E-07
NI63	1.77E-04	1.25E-05	6.00E-06	0.	0.	0.	1.99E-06
NI65	7.49E-07	9.57E-08	4.36E-08	0.	0.	0.	5.193E-06
CU64	0.	1.15E-07	5.41E-08	0.	2.91E-07	0.	8.92E-06
ZN65	5.76E-06	2.00E-05	9.33E-06	0.	1.28E-05	0.	8.47E-06
ZN69M+D	2.40E-07	5.66E-07	5.19E-08	0.	3.44E-07	0.	3.11E-05
ZN69	1.47E-08	2.80E-08	1.96E-09	0.	1.83E-08	0.	5.16E-08
SE79	0.	3.73E-06	6.27E-07	0.	6.50E-06	0.	5.70E-07
BR82	0.	0.	3.04E-06	0.	0.	0.	0.
BR83+D	0.	0.	5.74E-08	0.	0.	0.	0.
BR84	0.	0.	7.22E-08	0.	0.	0.	0.
BR85	0.	0.	3.05E-09	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	0.	0.
KR85M	0.	0.	0.	0.	0.	0.	0.
KR85	0.	0.	0.	0.	0.	0.	0.
KR87	0.	0.	0.	0.	0.	0.	0.
KR88+D	0.	0.	0.	0.	0.	0.	0.
KR89	0.	0.	0.	0.	0.	0.	0.
RB86	0.	2.98E-05	1.40E-05	0.	0.	0.	4.41E-06
RB87	0.	1.75E-05	6.11E-06	0.	0.	0.	6.11E-07
RB88	0.	8.52E-08	4.54E-08	0.	0.	0.	7.30E-15
RB89+D	0.	5.50E-08	3.89E-08	0.	0.	0.	8.43E-17
SR89+D	4.40E-04	0.	1.26E-05	0.	0.	0.	5.24E-05
SR90+D	8.30E-03	0.	2.05E-03	0.	0.	0.	2.33E-04
SR91+D	8.07E-06	0.	3.21E-07	0.	0.	0.	3.66E-05
SR92+D	3.05E-06	0.	1.30E-07	0.	0.	0.	7.77E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	1.37E-08	0.	3.69E-10	0.	0.	0.	1.13E-04
Y91M+D	1.29E-10	0.	4.93E-12	0.	0.	0.	6.09E-09
Y91	2.01E-07	0.	5.39E-09	0.	0.	0.	8.24E-05
Y92	1.21E-09	0.	3.50E-11	0.	0.	0.	3.32E-05
Y93	3.83E-09	0.	1.05E-10	0.	0.	0.	1.17E-04
ZR93+D	5.53E-08	2.73E-08	1.49E-08	0.	9.65E-08	0.	2.58E-05
ZR95+D	4.12E-08	1.30E-08	8.94E-09	0.	1.91E-08	0.	3.00E-05
ZR97+D	2.37E-09	4.69E-10	2.16E-10	0.	7.11E-10	0.	1.27E-04
NB93M	3.44E-08	1.13E-08	2.83E-09	0.	1.32E-08	0.	4.07E-06
NB95	8.22E-09	4.56E-09	2.51E-09	0.	4.42E-09	0.	1.95E-05
NB97	7.37E-11	1.83E-11	6.68E-12	0.	2.14E-11	0.	4.37E-07
MO93	0.	1.06E-05	2.90E-07	0.	3.04E-06	0.	1.29E-06
MO99+D	0.	6.03E-06	1.15E-06	0.	1.38E-05	0.	1.08E-05
TC99M	3.32E-10	9.26E-10	1.20E-08	0.	1.38E-08	5.14E-10	6.08E-07
TC99	1.79E-07	2.63E-07	7.17E-08	0.	3.34E-06	2.72E-08	6.44E-06
TC101	3.60E-10	5.12E-10	5.03E-09	0.	9.26E-09	3.12E-10	8.75E-17
RU103+D	2.55E-07	0.	1.09E-07	0.	8.99E-07	0.	2.13E-05
RU105+D	2.18E-08	0.	8.46E-09	0.	2.75E-07	0.	1.76E-05
RU106+D	3.92E-06	0.	4.94E-07	0.	7.56E-06	0.	1.88E-04
RH105	1.73E-07	1.25E-07	8.20E-08	0.	5.31E-07	0.	1.59E-05
PD107	0.	2.08E-07	1.34E-08	0.	1.88E-06	0.	9.66E-07
PD109	0.	2.51E-07	5.70E-08	0.	1.45E-06	0.	2.53E-05
AG110M+D	2.05E-07	1.94E-07	1.18E-07	0.	3.70E-07	0.	5.45E-05
AG111	8.29E-08	3.44E-08	1.73E-08	0.	1.12E-07	0.	4.80E-05
CD113M	0.	4.51E-06	1.45E-07	0.	4.99E-06	0.	2.71E-05
CD115M	0.	2.60E-06	8.39E-08	0.	2.08E-06	0.	8.23E-05
SN123	4.44E-05	7.29E-07	1.08E-06	5.84E-07	0.	0.	6.71E-05
SN125+D	1.19E-05	2.37E-07	5.37E-07	1.86E-07	0.	0.	1.12E-04
SN126+D	1.16E-04	2.16E-06	3.30E-06	5.69E-07	0.	0.	2.58E-05
SB124	3.87E-06	7.13E-08	1.51E-06	8.78E-09	0.	3.38E-06	7.80E-05
SB125+D	2.48E-06	2.71E-08	5.80E-07	2.37E-09	0.	2.18E-06	1.93E-05
SB126	1.59E-06	3.25E-08	5.71E-07	8.99E-09	0.	1.14E-06	9.41E-05
SB127	3.63E-07	7.76E-09	1.37E-07	4.08E-09	0.	2.47E-07	6.16E-05
TE125M	3.83E-06	1.38E-06	5.12E-07	1.07E-06	0.	0.	1.13E-05
TE127M+D	9.67E-06	3.43E-06	1.15E-06	2.30E-06	3.92E-05	0.	2.41E-05
TE127	1.58E-07	5.60E-08	3.40E-08	1.09E-07	6.40E-07	0.	1.22E-05
TE129M+D	1.63E-05	6.05E-06	2.58E-06	5.26E-06	6.82E-05	0.	6.12E-05
TE129	4.48E-08	1.67E-08	1.09E-08	3.20E-08	1.88E-07	0.	2.45E-07
TE131M+D	2.44E-06	1.17E-06	9.76E-07	1.76E-06	1.22E-05	0.	9.39E-05
TE131+D	2.79E-08	1.15E-08	8.72E-09	2.15E-08	1.22E-07	0.	2.29E-09
TE132+D	3.49E-06	2.21E-06	2.08E-06	2.33E-06	2.12E-05	0.	7.00E-05
TE133M+D	6.44E-08	3.66E-08	3.56E-08	5.11E-08	3.62E-07	0.	1.48E-07
TE134+D	4.47E-08	2.87E-08	3.00E-08	3.67E-08	2.74E-07	0.	1.66E-09
I129	4.66E-06	3.92E-06	6.54E-06	4.77E-03	7.01E-06	0.	4.57E-07
I130	1.03E-06	2.98E-06	1.19E-06	2.43E-04	4.59E-06	0.	2.29E-06
I131+D	5.85E-06	8.19E-06	4.40E-06	2.39E-03	1.41E-05	0.	1.62E-06

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I132	2.79E-07	7.30E-07	2.62E-07	2.46E-05	1.15E-06	0.	3.18E-07
I133+D	2.01E-06	3.41E-06	1.04E-06	4.76E-04	5.98E-06	0.	2.58E-06
I134	1.46E-07	3.87E-07	1.39E-07	6.45E-06	6.10E-07	0.	5.10E-09
I135+D	6.10E-07	1.57E-06	5.82E-07	1.01E-04	2.48E-06	0.	1.74E-06
XE131M	0.	0.	0.	0.	0.	0.	0.
XE133M	0.	0.	0.	0.	0.	0.	0.
XE133	0.	0.	0.	0.	0.	0.	0.
XE135M	0.	0.	0.	0.	0.	0.	0.
XE135	0.	0.	0.	0.	0.	0.	0.
XE137	0.	0.	0.	0.	0.	0.	0.
XE138+D	0.	0.	0.	0.	0.	0.	0.
CS134M+D	2.94E-08	6.09E-08	3.13E-08	0.	3.39E-08	5.95E-09	4.05E-08
CS134	8.37E-05	1.97E-04	9.14E-05	0.	6.26E-05	2.39E-05	2.45E-06
CS135	2.78E-05	2.55E-05	5.96E-06	0.	9.73E-06	3.52E-06	4.46E-07
CS136	8.59E-06	3.38E-05	2.27E-05	0.	1.84E-05	2.90E-06	2.72E-06
CS137+D	1.12E-04	1.49E-04	5.19E-05	0.	5.07E-05	1.97E-05	2.12E-06
CS138	7.76E-08	1.49E-07	7.45E-08	0.	1.10E-07	1.28E-08	6.76E-11
CS139+D	4.87E-08	7.17E-08	2.63E-08	0.	5.79E-08	6.34E-09	3.33E-23
BA139	1.39E-07	9.78E-11	4.05E-09	0.	9.22E-11	6.74E-11	1.24E-06
BA140+D	2.84E-05	3.48E-08	1.83E-06	0.	1.18E-08	2.34E-08	4.38E-05
BA141+D	6.71E-08	5.01E-11	2.24E-09	0.	4.65E-11	3.43E-11	1.43E-13
BA142+D	2.99E-08	2.99E-11	1.84E-09	0.	2.53E-11	1.99E-11	9.18E-20
LA140	3.48E-09	1.71E-09	4.55E-10	0.	0.	0.	9.82E-05
LA141	4.55E-10	1.40E-10	2.31E-11	0.	0.	0.	2.48E-05
LA142	1.79E-10	7.95E-11	1.98E-11	0.	0.	0.	2.42E-06
CE141	1.33E-08	8.88E-09	1.02E-09	0.	4.18E-09	0.	2.54E-05
CE143+D	2.35E-09	1.71E-06	1.91E-10	0.	7.67E-10	0.	5.14E-05
CE144+D	6.96E-07	2.88E-07	3.74E-08	0.	1.72E-07	0.	1.75E-04
PR143	1.31E-08	5.23E-09	6.52E-10	0.	3.04E-09	0.	4.31E-05
PR144	4.30E-11	1.76E-11	2.18E-12	0.	1.01E-11	0.	4.74E-14
ND147+D	9.38E-09	1.02E-08	6.11E-10	0.	5.99E-09	0.	3.68E-05
PM147	1.05E-07	9.96E-09	4.06E-09	0.	1.90E-08	0.	9.47E-06
PM148M+D	4.14E-08	1.05E-08	8.21E-09	0.	1.59E-08	0.	6.61E-05
PM148	1.02E-08	1.66E-09	8.36E-10	0.	3.00E-09	0.	9.90E-05
PM149	2.17E-09	3.05E-10	1.25E-10	0.	5.81E-10	0.	4.49E-05
PM151	9.87E-10	1.63E-10	8.25E-11	0.	2.93E-10	0.	3.66E-05
SM151	8.73E-08	1.68E-08	3.94E-09	0.	1.84E-08	0.	5.70E-06
SM153	1.22E-09	1.01E-09	7.43E-11	0.	3.30E-10	0.	2.85E-05
EU152	2.45E-07	5.90E-08	5.20E-08	0.	2.74E-07	0.	2.17E-05
EU154	7.91E-07	1.02E-07	7.19E-08	0.	4.56E-07	0.	5.39E-05
EU155	1.74E-07	1.68E-08	1.04E-08	0.	6.57E-08	0.	9.63E-05
EU156	1.92E-08	1.44E-08	2.35E-09	0.	9.69E-09	0.	7.36E-05
TB160	6.47E-08	0.	8.07E-09	0.	2.56E-08	0.	4.19E-05
HO166M	3.57E-07	1.10E-07	7.96E-08	0.	1.61E-07	0.	0.
W181	1.42E-08	4.58E-09	4.79E-10	0.	0.	0.	3.90E-07
W185	5.79E-07	1.91E-07	2.02E-08	0.	0.	0.	1.65E-05
W187	1.46E-07	1.19E-07	4.17E-08	0.	0.	0.	3.22E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	1.81E-02	5.44E-03	7.01E-04	0.	1.72E-02	0.	5.74E-05
BI210+D	6.59E-07	4.51E-06	5.66E-08	0.	5.48E-05	0.	5.15E-05
PO210	6.09E-04	1.07E-03	1.23E-04	0.	3.60E-03	0.	6.75E-05
RN222+D	0.	0.	0.	0.	0.	0.	0.
RA223+D	7.11E-03	1.08E-05	1.42E-03	0.	3.10E-04	0.	3.43E-04
RA224+D	2.31E-03	5.52E-06	4.61E-04	0.	1.58E-04	0.	3.71E-04
RA225+D	9.37E-03	1.10E-05	1.87E-03	0.	3.15E-04	0.	3.27E-04
RA226+D	3.22E-01	8.13E-06	2.39E-01	0.	2.32E-04	0.	3.51E-04
RA228+D	1.37E-01	4.41E-06	1.51E-01	0.	1.26E-04	0.	5.98E-05
AC225	6.29E-06	8.59E-06	4.22E-07	0.	9.85E-07	0.	4.36E-04
AC227+D	2.05E-03	3.03E-04	1.22E-04	0.	8.81E-05	0.	8.68E-05
TH227+D	1.96E-05	3.52E-07	5.65E-07	0.	2.01E-06	0.	5.75E-04
TH228+D	6.80E-04	1.14E-05	2.30E-05	0.	6.41E-05	0.	5.97E-04
TH229	8.39E-03	1.26E-04	4.11E-04	0.	6.10E-04	0.	5.43E-04
TH230	2.16E-03	1.23E-04	6.00E-05	0.	5.99E-04	0.	6.38E-05
TH232+D	2.42E-03	1.05E-04	1.63E-04	0.	5.11E-04	0.	5.43E-05
TH234	1.14E-07	6.68E-09	3.31E-09	0.	3.81E-08	0.	1.21E-04
PA231+D	4.31E-03	1.62E-04	1.68E-04	0.	9.10E-04	0.	7.60E-05
PA233	7.33E-09	1.41E-09	1.26E-09	0.	5.32E-09	0.	1.61E-05
U232+D	5.89E-03	0.	4.21E-04	0.	6.38E-04	0.	7.19E-05
U233+D	1.24E-03	0.	7.54E-05	0.	2.90E-04	0.	6.65E-05
U234	1.19E-03	0.	7.39E-05	0.	2.85E-04	0.	6.51E-05
U235+D	1.14E-03	0.	6.94E-05	0.	2.67E-04	0.	8.28E-05
U236	1.14E-03	0.	7.09E-05	0.	2.73E-04	0.	6.11E-05
U237	7.89E-08	0.	2.10E-08	0.	3.24E-07	0.	2.09E-05
U238+D	1.09E-03	0.	6.49E-05	0.	2.50E-04	0.	5.83E-05
NP237+D	1.44E-03	1.25E-04	5.85E-05	0.	4.33E-04	0.	8.41E-05
NP238	1.95E-08	5.22E-10	3.04E-10	0.	1.79E-09	0.	3.83E-05
NP239	1.76E-09	1.66E-10	9.22E-11	0.	5.21E-10	0.	2.67E-05
PU238	7.21E-04	1.02E-04	1.82E-05	0.	7.80E-05	0.	7.73E-05
PU239	8.27E-04	1.12E-04	2.01E-05	0.	8.57E-05	0.	7.06E-05
PU240	8.26E-04	1.12E-04	2.01E-05	0.	8.56E-05	0.	7.19E-05
PU241+D	1.84E-05	9.42E-07	3.69E-07	0.	1.71E-06	0.	1.48E-06
PU242	7.66E-04	1.08E-04	1.94E-05	0.	8.25E-05	0.	6.92E-05
PU244	8.95E-04	1.23E-04	2.22E-05	0.	9.45E-05	0.	1.03E-04
AM241	8.62E-04	3.29E-04	5.75E-05	0.	4.31E-04	0.	7.87E-05
AM242M	8.70E-04	3.19E-04	5.80E-05	0.	4.30E-04	0.	9.90E-05
AM243	8.60E-04	3.17E-04	5.62E-05	0.	4.22E-04	0.	9.23E-05
CM242	2.94E-05	2.97E-05	1.95E-06	0.	8.89E-06	0.	8.40E-05
CM243	6.91E-04	2.86E-04	4.09E-05	0.	1.91E-04	0.	8.28E-05
CM244	5.32E-04	2.49E-04	3.19E-05	0.	1.49E-04	0.	8.00E-05
CM245	1.07E-03	3.33E-04	6.10E-05	0.	2.85E-04	0.	7.46E-05
CM246	1.06E-03	3.32E-04	6.09E-05	0.	2.84E-04	0.	7.33E-05
CM247+D	1.03E-03	3.27E-04	6.00E-05	0.	2.80E-04	0.	9.63E-05
CM248	8.60E-03	2.69E-03	4.95E-04	0.	2.31E-03	0.	1.55E-03
CR252	3.51E-04	0.	8.37E-06	0.	0.	0.	3.05E-04

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H3	0.	1.05E-07	1.05E-07	1.05E-07	1.05E-07	1.05E-07	1.05E-07
BE10	3.18E-06	4.91E-07	7.94E-08	0.	3.71E-07	0.	2.68E-05
C14	2.84E-06	5.68E-07	5.68E-07	5.68E-07	5.68E-07	5.68E-07	5.68E-07
N13	8.36E-09	8.36E-09	8.36E-09	8.36E-09	8.36E-09	8.36E-09	8.36E-09
F18	6.24E-07	0.	6.92E-08	0.	0.	0.	1.85E-08
NA22	1.74E-05	1.74E-05	1.74E-05	1.74E-05	1.74E-05	1.74E-05	1.74E-05
NA24	1.70E-06	1.70E-06	1.70E-06	1.70E-06	1.70E-06	1.70E-06	1.70E-06
P32	1.93E-04	1.20E-05	7.46E-06	0.	0.	0.	2.17E-05
AR39	0.	0.	0.	0.	0.	0.	0.
AR41	0.	0.	0.	0.	0.	0.	0.
CA41	1.83E-05	0.	2.00E-05	0.	0.	0.	1.84E-07
SC46	5.51E-09	1.07E-08	3.11E-09	0.	9.99E-09	0.	5.21E-05
CR51	0.	0.	2.66E-09	1.59E-09	5.86E-10	3.53E-09	6.69E-07
MN54	0.	4.57E-06	8.72E-07	0.	1.36E-06	0.	1.40E-05
MN56	0.	1.15E-07	2.04E-08	0.	1.46E-07	0.	3.67E-06
FE55	2.75E-06	1.90E-06	4.43E-07	0.	0.	1.06E-06	1.09E-06
FE59	4.34E-06	1.02E-05	3.91E-06	0.	0.	2.85E-06	3.40E-05
CO57	0.	1.75E-07	2.91E-07	0.	0.	0.	4.44E-06
CO58	0.	7.45E-07	1.67E-06	0.	0.	0.	1.51E-05
CO60	0.	2.14E-06	4.72E-06	0.	0.	0.	4.02E-05
NI59	9.76E-06	3.35E-06	1.63E-06	0.	0.	0.	6.90E-07
NI63	1.30E-04	9.01E-06	4.36E-06	0.	0.	0.	1.88E-06
NI65	5.28E-07	6.86E-08	3.13E-08	0.	0.	0.	1.74E-06
CU64	0.	8.33E-08	3.91E-08	0.	2.10E-07	0.	7.10E-06
ZN65	4.84E-06	1.54E-05	6.96E-06	0.	1.03E-05	0.	9.70E-06
ZN69M+D	1.70E-07	4.08E-07	3.73E-08	0.	2.47E-07	0.	2.49E-05
ZN69	1.03E-08	1.97E-08	1.37E-09	0.	1.28E-08	0.	2.96E-09
SE79	0.	2.63E-06	4.39E-07	0.	4.55E-06	0.	5.38E-07
BR82	0.	0.	2.26E-06	0.	0.	0.	2.59E-06
BR83+D	0.	0.	4.02E-08	0.	0.	0.	5.79E-08
BR84	0.	0.	5.21E-08	0.	0.	0.	4.09E-13
BR85	0.	0.	2.14E-09	0.	0.	0.	0.
KR83M	0.	0.	0.	0.	0.	0.	0.
KR85M	0.	0.	0.	0.	0.	0.	0.
KR85	0.	0.	0.	0.	0.	0.	0.
KR87	0.	0.	0.	0.	0.	0.	0.
KR88+D	0.	0.	0.	0.	0.	0.	0.
KR89	0.	0.	0.	0.	0.	0.	0.
RB86	0.	2.11E-05	9.83E-06	0.	0.	0.	4.16E-06
RB87	0.	1.23E-05	4.28E-06	0.	0.	0.	5.76E-07
RB88	0.	6.05E-08	3.21E-08	0.	0.	0.	8.36E-19
RB89+D	0.	4.01E-08	2.82E-08	0.	0.	0.	2.33E-21
SR89+D	3.08E-04	0.	8.84E-06	0.	0.	0.	4.94E-05
SR90+D	7.58E-03	0.	1.86E-03	0.	0.	0.	2.19E-04
SR91+D	5.67E-06	0.	2.29E-07	0.	0.	0.	2.70E-05
SR92+D	2.15E-06	0.	9.30E-08	0.	0.	0.	4.26E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
Y90	9.62E-09	0.	2.58E-10	0.	0.	0.	1.02E-04
Y91M+D	9.09E-11	0.	3.52E-12	0.	0.	0.	2.67E-10
Y91	1.41E-07	0.	3.77E-09	0.	0.	0.	7.76E-05
Y92	8.45E-10	0.	2.47E-11	0.	0.	0.	1.48E-05
Y93	2.68E-09	0.	7.40E-11	0.	0.	0.	8.50E-05
ZR93+D	4.18E-08	2.34E-09	1.09E-09	0.	8.87E-09	0.	2.43E-06
ZR95+D	3.04E-08	9.75E-09	6.60E-09	0.	1.53E-08	0.	3.09E-05
ZR97+D	1.68E-09	3.39E-10	1.55E-10	0.	5.12E-10	0.	1.05E-04
NB93M	2.55E-08	8.32E-09	2.05E-09	0.	9.57E-09	0.	3.84E-06
NB95	6.22E-09	3.46E-09	1.86E-09	0.	3.42E-09	0.	2.10E-05
NB97	5.22E-11	1.32E-11	4.82E-12	0.	1.54E-11	0.	4.87E-08
MO93	0.	7.51E-06	2.03E-07	0.	2.13E-06	0.	1.22E-06
MO99+D	0.	4.31E-06	8.20E-07	0.	9.76E-06	0.	9.99E-06
TC99M	2.47E-10	6.98E-10	8.89E-09	0.	1.06E-08	3.42E-10	4.13E-07
TC99	1.25E-07	1.86E-07	5.02E-08	0.	2.34E-06	1.58E-08	6.08E-06
TC101	2.54E-10	3.66E-10	3.59E-09	0.	6.59E-09	1.87E-10	1.10E-21
RU103+D	1.85E-07	0.	7.97E-08	0.	7.06E-07	0.	2.16E-05
RU105+D	1.54E-08	0.	6.08E-09	0.	1.99E-07	0.	9.42E-06
RU106+D	2.75E-06	0.	3.48E-07	0.	5.31E-06	0.	1.78E-04
RH105	1.21E-07	8.85E-08	5.83E-08	0.	3.76E-07	0.	1.41E-05
PD107	0.	1.47E-07	9.40E-09	0.	1.32E-06	0.	9.11E-07
PD109	0.	1.77E-07	3.99E-08	0.	1.01E-06	0.	1.96E-05
AG110M+D	1.60E-07	1.48E-07	8.79E-08	0.	2.91E-07	0.	6.04E-05
AG111	5.81E-08	2.43E-08	1.21E-08	0.	7.84E-08	0.	4.46E-05
CD113M	0.	3.18E-06	1.02E-07	0.	3.50E-06	0.	2.56E-05
CD115M	0.	1.84E-06	5.87E-08	0.	1.46E-06	0.	7.74E-05
SN123	3.11E-05	5.15E-07	7.59E-07	4.38E-07	0.	0.	6.33E-05
SN125+D	8.33E-06	1.68E-07	3.78E-07	1.39E-07	0.	0.	1.04E-04
SN126+D	8.45E-05	1.67E-06	2.40E-06	4.92E-07	0.	0.	2.43E-05
SB124	2.80E-06	5.29E-08	1.11E-06	6.79E-09	0.	2.18E-06	7.95E-05
SB125+D	1.79E-06	2.00E-08	4.26E-07	1.82E-09	0.	1.38E-06	1.97E-05
SB126	1.15E-06	2.34E-08	4.15E-07	7.04E-09	0.	7.05E-07	9.40E-05
SB127	2.58E-07	5.65E-09	9.90E-08	3.10E-09	0.	1.53E-07	5.90E-05
TE125M	2.68E-06	9.71E-07	3.59E-07	8.06E-07	1.09E-05	0.	1.07E-05
TE125M+D	6.77E-06	2.42E-06	8.25E-07	1.73E-06	2.75E-05	0.	2.27E-05
TE127	1.10E-07	3.95E-08	2.38E-08	8.15E-08	4.48E-07	0.	8.68E-06
TE129M+D	1.15E-05	4.29E-06	1.82E-06	3.95E-06	4.80E-05	0.	5.79E-05
TE129	3.14E-08	1.18E-08	7.65E-09	2.41E-08	1.32E-07	0.	2.37E-08
TE131M+D	1.73E-06	8.46E-07	7.05E-07	1.34E-06	8.57E-06	0.	8.40E-05
TE131+D	1.97E-08	8.23E-09	6.22E-09	1.62E-08	8.63E-08	0.	2.79E-09
TE132+D	2.52E-06	1.63E-06	1.53E-06	1.80E-06	1.57E-05	0.	7.71E-05
TE133M+D	4.62E-08	2.70E-08	2.60E-08	3.91E-08	2.67E-07	0.	6.64E-08
TE134+D	3.24E-08	2.12E-08	1.30E-08	2.83E-08	2.05E-07	0.	3.59E-11
I129	3.27E-06	2.81E-06	9.21E-06	7.23E-03	6.04E-06	0.	4.44E-07
I130	7.56E-07	2.23E-06	8.80E-07	1.89E-04	3.48E-06	0.	1.92E-06
I131+D	4.16E-06	5.95E-06	3.41E-06	1.95E-03	1.02E-05	0.	1.57E-06

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
I132	2.03E-07	5.43E-07	1.90E-07	1.90E-05	8.65E-07	0.	1.02E-07
I133+D	1.42E-06	2.47E-06	7.53E-07	3.63E-04	4.31E-06	0.	2.22E-06
I134	1.06E-07	2.88E-07	1.03E-07	4.99E-06	4.58E-07	0.	2.51E-10
I135+D	4.43E-07	1.16E-06	4.28E-07	7.65E-05	1.86E-06	0.	1.31E-06
XE131M	0.	0.	0.	0.	0.	0.	0.
XE133M	0.	0.	0.	0.	0.	0.	0.
XE133	0.	0.	0.	0.	0.	0.	0.
XE135M	0.	0.	0.	0.	0.	0.	0.
XE135	0.	0.	0.	0.	0.	0.	0.
XE137	0.	0.	0.	0.	0.	0.	0.
XE138+D	0.	0.	0.	0.	0.	0.	0.
CS134M+D	2.13E-08	4.48E-08	2.29E-08	0.	2.43E-08	3.83E-09	1.58E-08
CS134	6.22E-05	1.48E-04	1.21E-04	0.	4.79E-05	1.59E-05	2.59E-06
CS135	1.95E-05	1.80E-05	7.99E-06	0.	6.81E-06	2.04E-06	4.21E-07
CS136	6.51E-06	2.57E-05	1.85E-05	0.	1.43E-05	1.96E-06	2.92E-06
CS137+D	7.97E-05	1.09E-04	7.14E-05	0.	3.70E-05	1.23E-05	2.11E-06
CS138	6.52E-08	1.09E-07	5.40E-08	0.	8.01E-08	7.91E-09	4.65E-13
CS139+D	3.41E-08	5.08E-08	1.85E-08	0.	4.07E-08	3.70E-09	1.10E-30
BA139	9.70E-08	6.91E-11	2.84E-09	0.	6.46E-11	3.92E-11	1.72E-07
BA140+D	2.03E-05	2.55E-08	1.33E-06	0.	8.67E-09	1.46E-08	4.18E-05
BA141+D	4.71E-08	3.56E-11	1.59E-09	0.	3.31E-11	2.02E-11	2.22E-17
BA142+D	2.13E-08	2.19E-11	1.34E-09	0.	1.85E-11	1.24E-11	3.00E-26
LA140	2.50E-09	1.26E-09	3.33E-10	0.	0.	0.	9.25E-05
LA141	3.19E-10	9.90E-11	1.62E-11	0.	0.	0.	1.18E-05
LA142	1.28E-10	5.82E-11	1.45E-11	0.	0.	0.	4.25E-07
CE141	9.36E-09	6.33E-09	7.18E-10	0.	2.94E-09	0.	2.42E-05
CE143+D	1.65E-09	1.22E-06	1.35E-10	0.	5.37E-10	0.	4.56E-05
CE144+D	4.88E-07	2.04E-07	2.62E-08	0.	1.21E-07	0.	1.65E-04
PR143	9.20E-09	3.69E-09	4.56E-10	0.	2.13E-09	0.	4.03E-05
PR144	3.01E-11	1.25E-11	1.53E-12	0.	7.05E-12	0.	4.33E-18
ND147+D	6.29E-09	7.27E-09	4.35E-10	0.	4.25E-09	0.	3.49E-05
PM147	7.54E-08	7.09E-09	2.87E-09	0.	1.34E-08	0.	8.93E-06
PM148M+D	3.07E-08	7.95E-09	6.08E-09	0.	1.20E-08	0.	6.74E-05
PM148	7.17E-09	1.19E-09	5.99E-10	0.	2.25E-09	0.	9.35E-05
PM149	1.52E-09	2.15E-10	8.78E-11	0.	4.06E-10	0.	4.03E-05
PM151	6.97E-10	1.17E-10	5.91E-11	0.	2.09E-10	0.	3.22E-05
SM151	6.90E-08	1.19E-08	2.85E-09	0.	1.33E-08	0.	5.25E-06
SM153	8.57E-10	7.15E-10	5.22E-11	0.	2.31E-10	0.	2.55E-05
EU152	1.95E-07	4.44E-08	3.90E-08	0.	2.75E-07	0.	2.56E-05
EU154	6.15E-07	7.56E-08	5.38E-08	0.	3.62E-07	0.	5.48E-05
EU155	8.60E-08	1.22E-08	7.87E-09	0.	5.63E-08	0.	9.60E-06
EU156	1.37E-08	1.06E-08	1.71E-09	0.	7.08E-09	0.	7.26E-05
TB160	4.70E-08	0.	5.86E-09	0.	1.94E-08	0.	4.33E-05
HO166M	2.70E-07	8.43E-08	6.40E-08	0.	1.26E-07	0.	0.
W181	9.91E-09	3.23E-09	3.46E-10	0.	0.	0.	3.68E-07
W185	4.05E-07	1.35E-07	1.42E-08	0.	0.	0.	1.56E-05
W187	1.03E-07	8.61E-08	3.01E-08	0.	0.	0.	2.82E-05

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ISOTOPE	BONE	LIVER	TOTAL BODY	THYROID	KIDNEY	LUNG	GI-LLI
PB210+D	1.53E-02	4.37E-03	5.44E-04	0.	1.23E-02	0.	5.42E-05
BI210+D	4.61E-07	3.18E-06	3.96E-08	0.	3.83E-05	0.	4.75E-05
PO210	3.56E-04	7.56E-04	8.59E-05	0.	2.52E-03	0.	6.36E-05
RN222+D	0.	0.	0.	0.	0.	0.	0.
RA223+D	4.97E-03	7.65E-06	9.94E-04	0.	2.17E-04	0.	3.21E-04
RA224+D	1.61E-03	3.90E-06	3.23E-04	0.	1.10E-04	0.	3.40E-04
RA225+D	6.56E-03	7.78E-06	1.31E-03	0.	2.21E-04	0.	3.06E-04
RA226+D	3.02E-01	5.74E-06	2.20E-01	0.	1.63E-04	0.	3.32E-04
RA228+D	1.12E-01	3.12E-06	1.21E-01	0.	8.83E-05	0.	5.64E-05
AC225	4.40E-06	6.06E-06	2.96E-07	0.	6.90E-07	0.	4.07E-04
AC227+D	1.87E-03	2.48E-04	1.11E-04	0.	8.00E-05	0.	8.19E-05
TH227+D	1.37E-05	2.48E-07	3.95E-07	0.	1.41E-06	0.	5.40E-04
TH228+D	4.96E-04	8.40E-06	1.68E-05	0.	4.67E-05	0.	5.63E-04
TH229	7.98E-03	1.19E-04	3.91E-04	0.	5.75E-04	0.	5.12E-04
TH230	2.06E-03	1.17E-04	5.70E-05	0.	5.65E-04	0.	6.02E-05
TH232+D	2.30E-03	1.00E-04	1.50E-04	0.	4.82E-04	0.	5.12E-05
TH234	8.01E-08	4.71E-09	2.31E-09	0.	2.67E-08	0.	1.13E-04
PA231+D	4.10E-03	1.54E-04	1.59E-04	0.	8.64E-04	0.	7.17E-05
PA233	5.26E-09	1.06E-09	9.12E-10	0.	3.99E-09	0.	1.64E-05
U232+D	4.13E-03	0.	2.95E-04	0.	4.47E-04	0.	6.78E-05
U233+D	8.71E-04	0.	5.28E-05	0.	2.03E-04	0.	6.27E-05
U234	8.36E-04	0.	5.17E-05	0.	1.99E-04	0.	6.14E-05
U235+D	8.01E-04	0.	4.86E-05	0.	1.87E-04	0.	7.81E-05
U236	8.01E-04	0.	4.96E-05	0.	1.91E-04	0.	5.76E-05
U237	5.52E-8	0.	1.47E-08	0.	2.27E-07	0.	1.94E-05
U238+D	7.67E-04	0.	4.54E-05	0.	1.75E-04	0.	5.50E-05
NP237+D	1.37E-03	1.19E-04	5.54E-05	0.	4.12E-04	0.	7.94E-05
NP238	1.37E-08	3.69E-10	2.13E-10	0.	1.25E-09	0.	3.43E-05
NP239	1.19E-09	1.17E-10	6.45E-11	0.	3.65E-10	0.	2.40E-05
PU238	6.80E-04	9.58E-05	1.71E-05	0.	7.32E-05	0.	7.30E-05
PU239	7.87E-04	1.06E-04	1.91E-05	0.	8.11E-05	0.	6.66E-05
PU240	7.85E-04	1.06E-04	1.91E-05	0.	8.10E-05	0.	6.78E-05
PU241+D	1.65E-05	8.44E-07	3.32E-07	0.	1.53E-06	0.	1.40E-06
PU242	7.29E-04	1.02E-04	1.84E-05	0.	7.81E-05	0.	6.53E-05
PU244	8.52E-04	1.17E-04	2.11E-05	0.	8.95E-05	0.	9.73E-05
AM241	8.19E-04	2.88E-04	5.41E-05	0.	4.07E-04	0.	7.42E-05
AM242M	8.24E-04	2.78E-04	5.43E-05	0.	4.05E-04	0.	9.34E-05
AM243	8.18E-04	2.78E-04	5.30E-05	0.	3.99E-04	0.	8.70E-05
CM242	2.06E-05	2.10E-05	1.37E-06	0.	6.22E-06	0.	7.92E-05
CM243	6.39E-04	2.41E-04	3.75E-05	0.	1.75E-04	0.	7.81E-05
CM244	4.83E-04	2.07E-04	2.87E-05	0.	1.34E-04	0.	7.55E-05
CM245	1.02E-03	2.87E-04	5.76E-05	0.	2.69E-04	0.	7.04E-05
CM246	1.01E-03	2.87E-04	5.75E-05	0.	2.68E-04	0.	6.91E-05
CM247+D	9.84E-04	2.83E-04	5.67E-05	0.	2.64E-04	0.	9.09E-05
CM248	8.18E-03	2.33E-03	4.67E-04	0.	2.18E-03	0.	1.47E-03
CF252	2.64E-04	0.	6.29E-06	0.	0.	0.	2.88E-04

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TABLE 2.2

**PALISADES
Liquid Effluent**

Design Basis Quantity

<u>Nuclide</u>	<u>Half-Life</u>	<u>Dose Conversion Factors (mrem/Ci)</u>	<u>Individual/Organ</u>	<u>Design Basis Quantity (Curies)</u>
H-3	12.3 yr	1.75E-06	Adult/TB	1.71E+06
Na-24	15 h	5.44E-03	Teen/TB	551.5
Sc-46	83.9 d	2.02E-02	Teen/TB	148.5
Cr-51	27.8 d	1.56E-03	Adult/GI (LLI)	6,410.0
Mn-54	303 d	3.50E-02	Teen/TB	85.7
Fe-55	2.6 yr	4.48E-03	Child/Bone	2,232.0
Mn-56	2.576 h	1.86E-03	Teen/TB	1,612.0
Co-57	270 d	4.39E-03	Teen/TB	683.4
Co-58	71.3 d	1.03E-02	Teen/TB	291.3
Fe-59	45.6 d	4.08E-02	Adult/GI (LLI)	245.1
Co-60	5.26 yr	4.71E-01	Teen/TB	6.37
Cu-64	12.8 h	1.32E-03	Teen/GI (LLI)	7,575.0
Ni-65	2.56 h	5.82E-04	Teen/TB	5,154.0
Zn-65	245 d	1.83E-01	Teen/TB	16.4
Br-84	31.8 mo	2.02E-03	Teen/TB	1,485.2
Rb-86	1.02 mo	3.06E-01	Child/TB	9.80
Rb-88	17.8 mo	6.92E-04	Teen/TB	4,335.3
Sr-89	52.7 d	1.56E-01	Child/Bone	64.1
Sr-90	27.7 yr	2.71E-00	Adult/Bone	3.69
Sr-91	9.67 h	1.16E-03	Teen/TB	2,586.0
Sr-92	2.71 h	1.51E-03	Teen/TB	1,986.8
Y-92	3.53 h	2.69E-04	Teen/TB	11,150.0
Nb-95	35 d	7.24E+00	Adult/GI (LLI)	1.38
Zr-95	65.5 d	6.17E-03	Teen/TB	486.2
Nb-97	72 mo	6.95E-04	Teen/TB	4,316.6
Zr-97	17 h	9.28E-04	Teen/TB	3,232.8
Mo-99	66.7 h	1.11E-03	Teen/Kidney	9,009.0
Tc-99m	6.05 h	1.42E-04	Teen/TB	21,126.8
Ru-103	39.5 d	2.74E-03	Teen/TB	1,094.9
Ag-110m	255 d	7.75E-02	Teen/TB	38.7

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TABLE 2.2 (continued)

**PALISADES
Liquid Effluent**

Design Basis Quantity

Nuclide	Half-Life	Dose Conversion Factors (mrem/Ci)	Individual/Organ	Design Basis Quantity (Curies)
Cd-113m	13.6 yr	6.02E-02	Adult/GI (LLI)	166.1
Sb-124	60 d	1.51E-02	Teen/TB	198.7
Sb-125	2.7 yr	5.11E-02	Teen/TB	58.7
Te-127	9.4 h	7.38E-03	Teen/GI (LLI)	1,355.0
Te-127m	109 d	1.39E-01	Teen/Kidney	71.9
Te-129m	34.1 d	2.66E-01	Adult/GI (LLI)	37.6
I-130	12.3 h	1.17E-02	Child/Thyroid	854.7
I-131	8.05 d	3.27E-01	Child/Thyroid	30.6
Te-131m	30 h	2.27E-01	Adult/GI (LLI)	44.0
I-132	2.26 h	3.18E-05	Teen/TB	94,339.0
Te-132	77.7 h	2.93E-01	Adult/GI (LLI)	34.1
I-133	20.3 h	3.94E-02	Child/Thyroid	253.8
Cs-134	2 yr	2.86E+00	Adult/TB	1.04
I-134	52 mo	2.43E-03	Teen/TB	1,234.0
I-135	6.68 h	1.64E-03	Child/Thyroid	6,097.0
Cs-136	13.7 d	4.13E-01	Adult/TB	7.26
Cs-137	30 yr	1.71E+00	Adult/TB	1.75
Cs-138	32.2 mo	2.31E-03	Teen/TB	1,298.0
Ba-139	82.9 mo	4.66E-05	Teen/TB	64,377.0
Ba-140	12.8 d	7.96E-04	Teen/TB	3,768.0
La-140	40.22 h	1.85E-02	Adult/GI (LLI)	540.5
Ce-141	32.5 d	3.70E-04	Teen/TB	8,108.0
Ce-144	284 d	1.56E-03	Teen/TB	1,923.0
Eu-152	12.7 yr	3.24E-01	Teen/TB	9.25
W-187	23.9 h	1.98E-01	Adult/GI (LLI)	50.5
Np-239	2.346 d	2.26E-03	Adult/GI (LLI)	4,424.0

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PALISADES NUCLEAR PLANT
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Revision 21

III. URANIUM FUEL CYCLE DOSE

A. SPECIFICATION

In accordance with Appendix A, Section III.I.1, if either liquid or gaseous quarterly releases exceed the quantity which would cause offsite doses more than twice the limit of Appendix A, Sections III.C.1, III.D.1, or III.H.1, then the cumulative dose contributions from combined release plus direct radiation sources (from the reactor unit and radwaste storage tanks) shall be calculated. The dose is to be determined for the member of the public protected to be the most highly exposed to these combined sources.

B. ASSUMPTIONS

1. The full time resident determined to be maximally exposed individual (excluding infant) is assumed also to be a fisherman. This individual is assumed to drink water and ingest local fish at the rates specified in Sections II.C.2.1 and II.C.2.2.
2. Amount of shore line fishing (at accessible shoreline adjacent to site security fence) is conservatively assumed as 48 hours per quarter (average of approximately 1/2 hour per day each day of the quarter) for the second and third quarters of the year, 36 hours for the fourth quarter and 16 hours for the first quarter.

PALISADES NUCLEAR PLANT
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Revision 21

C. DOSE CALCULATION

Maximum doses to the total body and internal organs of an individual shall be determined by use of LADTAP and GASPAR computer codes, and doses to like organs and total body summed. Added to this sum will be a mean dose rate, calculated or measured for the shoreline due to Plant present during the quarter in question, times the assumed fishing time.

$$D_{40} = D_G + D_L + (R_T)(T) \quad (2.15)$$

where:

D_{40} = 40 CFR 190 dose (mrem).

D_G = Limiting dose to an individual from gaseous source term (mrem).

D_L = Limiting dose to an individual from liquid source term (mrem).

R_T = Mean dose rate calculated to be applicable to Lake Michigan shoreline adjacent to Plant site (mrem/hr).

T = Assumed shoreline fishing time for the quarter in questions (hours).

IV. REVISIONS TO THE OFFSITE DOSE CALCULATION MANUAL

A. REQUIREMENTS

1. For all revisions to the Offsite Dose Calculation Manual, complete Attachment 1.
2. All revisions to the Offsite Dose Calculation Manual are required to be reviewed by the Onsite Safety Review Committee.

2-10-09

OFFSITE DOSE CALCULATION MANUAL CHANGE REVIEWS

1. Description and Evaluation:

Provide a brief description of each change and provide sufficient information to support the change, with appropriate analyses or evaluations justifying the change if needed.

2. Determination:

Answer the following questions:

- a. Does the proposed change maintain the level of radioactive effluent control required by 10 CFR 20.1302? (Compliance with dose limits for individual members of the public, where annual average concentrations of radioactive material released in gaseous and liquid effluents at the boundary of the unrestricted area do not exceed the values specified in Table 2 of Appendix B Part 20.)

Yes

No

- b. Does the proposed change maintain the level of radioactive effluent control required by 40 CFR 190? (Total dose uranium fuel cycle - less than or equal to 25 mrem total body or any organ, or less than or equal to 75 mrem thyroid.)

Yes

No

2-10-08

OFFSITE DOSE CALCULATION MANUAL CHANGE REVIEWS

- c. Does the proposed change maintain the level of radioactive effluent control required by 10 CFR 50.36a? (Technical Specifications on effluents from nuclear power reactors, where the Offsite Dose Calculation Manual is the document where the effluent controls are specified, and all the requirements of this regulation are demonstrated.)

Yes

No

- d. Does the proposed change maintain the level of radioactive effluent control required by 10 CFR 50, Appendix I? (Numerical guides for design objectives and limiting conditions for operation to meet the criterion "as low as reasonably achievable," for radioactive material in light-water-cooled nuclear power reactor effluents, lists the annual dose commitments to unrestricted areas for liquid and gaseous effluents.)

Yes

No

- e. Does the proposed change adversely impact the accuracy or reliability of effluent calculations?

Yes

No

OFFSITE DOSE CALCULATION MANUAL CHANGE REVIEWS

f. Does the proposed change adversely impact the accuracy or reliability of dose calculations?

Yes

No

g. Does the proposed change adversely impact the accuracy or reliability of setpoint calculations?

Yes

No

3. Conclusion:

Changes to the ODCM were made in accordance to the provisions of Technical Specification 5.5.1, Section c.

Prepared By: _____ / _____ Date

Reviewed By: _____ / _____ Date

ENCLOSURE 2
BRP RADIOACTIVE EFFLUENT RELEASE REPORT
LIQUID EFFLUENTS – SUMMATION OF RELEASES
JANUARY – DECEMBER 2008

This report provides information relating to radioactive effluent releases and solid radioactive waste disposal at Big Rock Point (BRP) for the year 2008. The report format is detailed in the BRP Offsite Dose Calculation Manual (ODCM), Section III. Effluent releases from BRP are controlled by the Defueled Technical Specifications and the ODCM requirements.

2008 Plant Operating History

During 2008, normal independent spent fuel storage installation (ISFSI) operations continued. There were no operational activities that generated any solid radioactive waste.

Liquid and gaseous effluent monitoring is no longer conducted as the former BRP nuclear plant property has been released from the license. Short-lived radionuclides, including iodines and noble gas, are neither expected nor reported.

1. Supplemental Information

A. Batch Releases

There were no batch releases of gaseous or liquid effluents during 2008. All batch releases of radioactive liquids as described in the ODCM ceased in 2004.

B. Abnormal Releases

There were no abnormal releases from BRP during 2008.

C. Radioactive Effluent Monitoring Instrumentation

BRP ODCM, Section I, currently specifies required actions when less than the minimum number of radioactive effluent monitoring instrument channels are operable. The ODCM also specifies these actions be taken when installed effluent monitoring systems are removed from service for decommissioning.

As decommissioning of the former operating plant is complete, all plant-installed liquid and gaseous radioactive effluent monitoring instrument channels have been permanently removed and dismantled.

2. Gaseous Effluents

Although there were no gaseous effluents released during 2008, Table 2 provides a summary of all gaseous radioactive effluent monitoring conducted during the reporting period as required by the ODCM.

3. Liquid Effluents

There were no liquid effluent batch releases during 2008. Table 3 lists and summarizes liquid effluent releases in accordance with the ODCM.

4. Solid Waste

There was no solid radioactive waste generated or shipped during 2008.

5. Summary of Radiological Impact on Man

The ODCM specifies that the annual effluent release report provide potential dose calculations based on measured effluent to liquid and gaseous pathways, if estimates of dose exceed 1 millirem to an organ or total body of any individual or more than 1 person-rem to the population within 50 miles. During 2008, there were no releases. Therefore, no calculations were required.

6. Offsite Dose Calculation Manual

The ODCM describes the radiological release requirements for the BRP site. There were no revisions to the ODCM in 2008.

7. Process Control Program (PCP)

The Process Control Program (PCP) describes solid waste processing and disposal methods at the BRP site. The PCP was not revised during 2008.

TABLE 1
BATCH RELEASES
 January 1, 2008 to December 31, 2008

A. GASEOUS

B. LIQUID	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
Number of Releases		N/A	N/A	N/A	N/A
Total Release Time	Minutes	N/A	N/A	N/A	N/A
Maximum Release Time	Minutes	N/A	N/A	N/A	N/A
Average Release Time	Minutes	N/A	N/A	N/A	N/A
Minimum Release Time	Minutes	N/A	N/A	N/A	N/A

TABLE 2
GASEOUS EFFLUENT RELEASES
 January 1, 2008 to December 31, 2008

A. FISSION AND ACTIVATION GASES	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Est Total Error %
1. Total release	Ci	N/A	N/A	N/A	N/A	N/A
2. Average release rate for period	μCi/sec	N/A	N/A	N/A	N/A	
3. Percent of annual avg EC	%	N/A	N/A	N/A	N/A	

B. IODINES	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Est Total Error %
1. Total iodine	Ci	N/A	N/A	N/A	N/A	N/A
2. Average release rate for period	μCi/sec	N/A	N/A	N/A	N/A	
3. Percent of annual avg EC	%	N/A	N/A	N/A	N/A	

C. PARTICULATES	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Est Total Error %
1. Particulates with half-life >8 day	Ci	N/A	N/A	N/A	N/A	N/A
2. Average release rate for period	μCi/sec	N/A	N/A	N/A	N/A	
3. Percent of annual avg EC	%	N/A	N/A	N/A	N/A	
4. Gross alpha radioactivity	Ci	N/A	N/A	N/A	N/A	

D. TRITIUM	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
1. Total Release	Ci	N/A	N/A	N/A	N/A
2. Average release rate for period	μCi/sec	N/A	N/A	N/A	N/A
3. Percent of annual avg EC	%	N/A	N/A	N/A	N/A

E. WHOLE BODY DOSE	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
1. Beta Air dose at Site Boundary due to Noble Gases (ODCM Section 1, 1.3.2 a (1) (2))	mrads	N/A	N/A	N/A	N/A
2. Percent limit	%	N/A	N/A	N/A	N/A
3. Gamma Air dose at Site Boundary due to Noble Gas (ODCM Section 1, 1.3.2 a (1) (2))	mrads	N/A	N/A	N/A	N/A
4. Percent limit	%	N/A	N/A	N/A	N/A

F. ORGAN DOSE (ODCM Section 1, 1.3.2b (1) (2))	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
1. Maximum organ dose to public based on Critical Receptors (child bone)	mrem	N/A	N/A	N/A	N/A
2. Percent of limit (7.5 mrem/quarter)	%	N/A	N/A	N/A	N/A

TABLE 2
GASEOUS EFFLUENT RELEASES
 January 1, 2008 to December 31, 2008

1. FISSION GASES	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
Krypton-85m	Ci	N/A	N/A	N/A	N/A
Krypton-87	Ci	N/A	N/A	N/A	N/A
Krypton-88	Ci	N/A	N/A	N/A	N/A
Xenon-133	Ci	N/A	N/A	N/A	N/A
Xenon-133m	Ci	N/A	N/A	N/A	N/A
Xenon-135	Ci	N/A	N/A	N/A	N/A
Xenon-135m	Ci	N/A	N/A	N/A	N/A
Xenon-138	Ci	N/A	N/A	N/A	N/A
Total for Period	Ci	N/A	N/A	N/A	N/A

2. IODINES					
Iodine-131	Ci	N/A	N/A	N/A	N/A
Iodine-132	Ci	N/A	N/A	N/A	N/A
Iodine-133	Ci	N/A	N/A	N/A	N/A
Iodine-134	Ci	N/A	N/A	N/A	N/A
Iodine-135	Ci	N/A	N/A	N/A	N/A
Total for Period	Ci	N/A	N/A	N/A	N/A

TABLE 2
GASEOUS EFFLUENT RELEASES
 January 1, 2008 to December 31, 2008

3. PARTICULATES*	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
Chromium-51	Ci	N/A	N/A	N/A	N/A
Manganese-54	Ci	N/A	N/A	N/A	N/A
Cobalt-58	Ci	N/A	N/A	N/A	N/A
Iron-59	Ci	N/A	N/A	N/A	N/A
Cobalt-60	Ci	N/A	N/A	N/A	N/A
Zinc-65	Ci	N/A	N/A	N/A	N/A
Silver-110m	Ci	N/A	N/A	N/A	N/A
Cesium-134	Ci	N/A	N/A	N/A	N/A
Cesium-137	Ci	N/A	N/A	N/A	N/A
Barium-140	Ci	N/A	N/A	N/A	N/A
Europium-152	Ci	N/A	N/A	N/A	N/A
Strontium-89	Ci	N/A	N/A	N/A	N/A
Strontium-90	Ci	N/A	N/A	N/A	N/A
Net unidentified beta	Ci	N/A	N/A	N/A	N/A
Total	Ci	N/A	N/A	N/A	N/A

* Particulates with half-life >8 days

TABLE 3
LIQUID EFFLUENT RELEASES
 January 1, 2008 to December 31, 2008

A. FISSION AND ACTIVATION PRODUCTS	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Est Total Error %
1. Total release (not including tritium, gases, alpha)	Ci	N/A	N/A	N/A	N/A	N/A
2. Average diluted concentration during period	μCi/ml	N/A	N/A	N/A	N/A	
3. Percent of EC	%	N/A	N/A	N/A	N/A	

B. TRITIUM	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Est Total Error %
1. Total release	Ci	N/A	N/A	N/A	N/A	N/A
2. Average diluted concentration during period	μCi/ml	N/A	N/A	N/A	N/A	
3. Percent of EC	%	N/A	N/A	N/A	N/A	

C. DISSOLVED AND ENTRAINED GASES	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Est Total Error %
1. Total release	Ci	N/A	N/A	N/A	N/A	N/A
2. Average diluted concentration during period	μCi/ml	N/A	N/A	N/A	N/A	
3. Percent of EC	%	N/A	N/A	N/A	N/A	

D. GROSS ALPHA RADIOACTIVITY	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
	Ci	N/A	N/A	N/A	N/A

E. VOLUME OF WASTE RELEASED (Prior to dilution)	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
	Liters	N/A	N/A	N/A	N/A

F. VOLUME OF DILUTION WATER USED DURING PERIOD	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
	Liters	N/A	N/A	N/A	N/A

G. MAXIMUM DOSE COMMITMENT WHOLEBODY	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
	mrem	N/A	N/A	N/A	N/A
Percent of ODCM Section 1, 2.3.2 a (1.5 mrem)	%	N/A	N/A	N/A	N/A

H. MAXIMUM DOSE COMMITMENT – ORGAN	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
	Mrem	N/A	N/A	N/A	N/A
Percent of ODCM Section 1, 2.3.2 b (3.0 mrem)	%	N/A	N/A	N/A	N/A

TABLE 3
LIQUID EFFLUENT RELEASES
 January 1, 2008 to December 31, 2008

1. NUCLIDES RELEASED	Units	1ST QTR	2ND QTR	3RD QTR	4TH QTR
Chromium-51	Ci	--	--	--	--
Manganese 54	Ci	--	--	--	--
Cobalt-58	Ci	--	--	--	--
Iron-59	Ci	--	--	--	--
Cobalt-60	Ci	--	--	--	--
Zinc-65	Ci	--	--	--	--
Strontium-89	Ci	--	--	--	--
Strontium-90	Ci	--	--	--	--
Molybdenum-99	Ci	--	--	--	--
Silver-110m	Ci	--	--	--	--
Iodine-131	Ci	--	--	--	--
Cesium-134	Ci	--	--	--	--
Cesium-137	Ci	--	--	--	--
Antimony-125	Ci	--	--	--	--
Tin-113	Ci	--	--	--	--
Net Unidentified Beta	Ci	--	--	--	--
Fission & Activation Product Total	Ci	--	--	--	--
Xenon-133	Ci	--	--	--	--
Tritium	Ci	--	--	--	--
Grand Total	Ci	--	--	--	--

ATTACHMENT 1

**BIG ROCK POINT
OFFSITE DOSE CALCULATION MANUAL**

REVISION 30

63 Pages Follow

VOLUME 25 OFF-SITE DOSE CALCULATION MANUAL
AND RELATED DOCUMENTS
A. OFF-SITE DOSE CALCULATION MANUAL
SECTION I – PROCEDURAL AND
SURVEILLANCE REQUIREMENTS

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ODCM SECTION I

PROCEDURAL AND SURVEILLANCE REQUIREMENTS

(Relocated Technical Specifications)

1.0 GASEOUS EFFLUENTS

1.1 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

1.1.1 Applicability

All installed gaseous effluent monitoring equipment has been removed from service as a result of decommissioning and dismantlement activities. When required for activities that have the potential for significant releases of particulate airborne radioactivity, air sampling and analyses shall be utilized to document that effluents do not exceed the levels specified by ODCM, Section I, Requirement 1.2.2.

1.1.2 Requirement

Work areas shall be sampled during evolutions that have potential for releasing dusts of concentration greater than ten times the Effluent Concentration (EC) values of 10CFR20, Appendix B, Table 2, Column 1, for the mixture of radionuclides present. Grab samples or continuous air monitor systems set up for personnel monitoring shall be analyzed for particulate concentrations over the interval of activity release from such areas. If remote techniques of demolition are utilized for activities in such areas and no local area samples are available, downwind sampling shall be utilized.

1.1.3 Action

With air particulate data unavailable for demolition areas that have beta-gamma surface activity greater than ten times the levels specified in Regulatory Guide 1.86, Table I, AND effluents have potential to enter the environment (contaminated particulate matter is expected to become suspended in air and is not confined), either:

- a. Suspend operations until local or downwind sampling is instituted, or
- b. Utilize conservative analyses for release from similarly contaminated areas to calculate dose at the site boundary in accordance with methodology of ODCM, Section II, Part 1.2.2.b.

1.1.4 Surveillance Requirements

Equipment utilized for particulate air sampling shall be calibrated, source checked, maintained and operated in accordance with Radiological Protection procedures applicable to worker protection.

1.1.5 Basis

Plant systems have been dismantled and fuel is present only in sealed dry storage containers at a location separate from the dismantlement area. Equipment, concrete and other structural materials having significant levels of activation or contamination have been shipped off as radiological waste. Radioactive materials that remain are predominantly of concentrations less than detectable at the lower limits of detection established for environmental analyses of solids (sediments) in ODCM, Section I, Table 1-3.

Worker protection monitoring is performed for all atmospheres with potential to reach 0.3 DAC over a 40-hour work week, and any short-term concentration above 1.0 DAC. At maximum (Cs-137*), DAC-to-EC ratio is $(6E-8)/(2E-10)=300$ at the work location. One DAC equals only 0.282 EC at off-site locations, due to atmospheric dilution of $9.4E-4$ times local on-site concentration at the site boundary (EA-BRP-RAE-0501).

Suspension of particulate radioactivity from surfaces has been calculated to provide higher potential concentrations than releases from bulk materials during decontamination and dismantlement activities (EA-BRP-RAE-0301). Maximum off-site dose with surface radioactivity at a level equal to ten times the Regulatory Guide 1.86 levels for beta-gamma radioactivity is 0.16 mrem/year, assuming 2000 hours per year of release.

Removal of plant-installed monitoring equipment has been performed in accordance with ODCM, Section III, Part 4.2.2. Since that time, conservative use of airborne samples from work areas as estimates of airborne release concentrations has shown no 31-day dose greater than 0.01% of the annual guideline (highest month was December 2004 at 0.0064% of the annual guideline value).

*Co-60 ratio is 200 or 350 (mean = 275), depending on chemical form.

1.2 GASEOUS EFFLUENTS DOSE RATE

1.2.1 Applicability

This section remains applicable only for tritium and radionuclides in particulate form. Surveillance requirements will cease to be applicable when analyses show no further potential for releases above the action levels of Requirement 1.2.3.

1.2.2 Requirement

The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the site boundary (see Figure 2-1) shall be limited to the following:

- a. For noble gases: NA
- b. For tritium and for all radionuclides in particulate form with half-lives greater than eight days: Less than or equal to 1500 mrem/year to any organ.

1.2.3 Action

With the dose rate averaged over a period of one hour exceeding the above limits (>35 DAC in the on-site work area); upon discovery, promptly restore the release rate to within the above limit(s).

1.2.4 Surveillance Requirements

- a. For noble gases: NA.
- b. The dose rate due to tritium and all radionuclides in particulate form with half lives greater than eight days in gaseous effluents shall be determined to be within the limits of Requirement 1.2.2 above by utilizing the methodology and parameters in Section II of this ODCM.

1.2.5 Basis

This specification is provided to allow the Licensee operational flexibility in meeting the limits of 10CFR50, Appendix I. The instantaneous dose rates of this specification are higher than the implied dose rates of 10CFR20, Appendix B, Table 2, Column 1, Effluent Concentrations for Members of the Public. However, the ALARA philosophy for atmospheric effluents ensures doses to the public at and beyond the site boundary are minimized and less than the annual doses of 10CFR50, Appendix I.

The required detection capabilities for radioactive materials in gaseous effluent samples are tabulated in terms of the lower limits of detection (LLDs). See Notation c of Table 1-3.

The relationship between DAC and the 10 EC of Requirement 1.1.2 is provided in Basis 1.1.5: one DAC at the work location equals 0.282 EC at the site boundary. Therefore, the hourly maximum of 10 EC at the site boundary equals $(10 \text{ EC}) / (0.282 \text{ EC/DAC}) = 35.4 \text{ DAC}$ at the work location.

1.3 AIRBORNE RADIOACTIVITY DOSE

1.3.1 Applicability

This section remains applicable only for doses due to tritium and radionuclides in particulate form. Surveillance requirements will cease to be applicable when analyses show no further potential for releases above the action levels of Requirements 1.3.3.b.

1.3.2 Requirements

- a. The air dose due to noble gases released in gaseous effluents is not applicable.

- b. The dose to a member of the public from tritium and all radionuclides in particulates form with half lives greater than eight days in gaseous effluents released to areas at and beyond the site boundary (see Figure 2.1) shall be limited to the following:
 - 1) During any calendar quarter: Less than or equal to 7.5 mrem to any organ, and
 - 2) During any calendar year: Less than or equal to 15 mrem to any organ.

1.3.3 Actions

- a. With the calculated dose from the release of radioactive material exceeding any of the above limits, prepare and submit to the Commission within 30 days a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. With projected dose in the next 31 days greater than two percent of the annual limits defined by Requirement 1.3.2.b above, institute controls to reduce release below two percent of the annual limit per month.

1.3.4 Surveillance Requirement

- a. Cumulative and projected dose contributions for the current calendar quarter and current calendar year for radioactive materials shall be determined at least once per 31 days in accordance with the methodology and parameters in this ODCM.
- b. Projected dose for the next 31 days shall be calculated at least once per 31 days.

1.3.5 Basis

This specification is provided to implement the guides set forth in Sections II.B and II.C of Appendix I. The action statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in airborne effluents to unrestricted areas will be kept "as low as is reasonably achievable."

The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a member of the public through appropriate pathways is unlikely to be substantially underestimated.

The dose calculation methodology and parameters established in Section II, Parts 1.2 and 1.3 of this ODCM 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 10CFR50, 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.

Section II, Part 1.2.2.b, provides methodology for evaluation of releases from unconfined areas. This methodology may be used for releases from contaminated structures in the process of dismantlement, in the absence of, or in lieu of, airborne analyses in the work area itself.

2.0 LIQUID EFFLUENTS

2.1 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

2.1.1 Applicability

Installed liquid effluent monitoring equipment is no longer required. Effluents purposefully discharged to the lake form surface and groundwater that have been detained for sedimentation will undergo precautionary sampling and analysis for tritium and radionuclides other than dissolved or entrained noble gases.

2.1.2 Requirement

Pending determination that such precaution is not necessary, any systems containing water detained for sedimentation or other purposes shall be sampled prior to initiation of a season of release and a minimum of monthly throughout the season thereafter, from grab samples or effluent composites.

2.1.3 Action

- a. With a detained water sample indicating radioactivity concentration greater than twice the lower limit of detection for environmental water samples as specified in ODCM, Section I, Table 1-1, prohibit further release of water until calculations confirm that the EC fraction is less than the requirement of ODCM, Section I, Part 2.2.2, AND
- b. With a sample indicating detectable radioactivity concentration greater than twice the lower limit of detection for environmental water samples as specified in ODCM, Section I, Table 1-1, prohibit release until calculations confirm that monthly release will not exceed the requirement of ODCM, Section I, Part 2.3.2.

2.1.4 Surveillance Requirements

Analytical accuracy for liquid samples is documented in routine calibration and quality control checks sufficient to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10CFR50.

2.1.5 Basis

Sampling of detained water is provided to indicate and quantify presence of radioactive material prior to and during releases of clarified liquids such that controls may be applied, as applicable, to limit such releases.

With the exception of tritium, previous experience has shown that site drainage water has contained radioactive materials only in association with suspended soils. Water is detained to allow sedimentation. This sedimentation serves to clarify the water for release and to minimize the potential for effluent to contain detectable radioactivity. Sampling is precautionary.

2.2 LIQUID EFFLUENTS CONCENTRATION

2.2.1 Applicability

Effluents purposefully discharged to the lake from surface and groundwater that have been detained for sedimentation will undergo precautionary sampling and analysis for tritium and radionuclides other than dissolved or entrained noble gases.

2.2.2 Requirement

The concentration of radioactive material released in liquid effluents from the site to UNRESTRICTED AREAS (identified as the site boundary, see Figure 2-1) shall be limited to ten times the concentration values specified in Appendix B, Table 2, Column 2, to 10CFR20 for radionuclides other than dissolved or entrained noble gases.

2.2.3 Action

With liquid effluent concentrations in areas at or beyond the site boundary (see Figure 2-1) exceeding limits, upon discovery, promptly restore the concentration to within the above limits.

2.2.4 Surveillance Requirements

- a. A representative grab sample of water to be released shall be analyzed prior to initiating a season of release.
- b. Composite or grab samples of potentially radioactive effluents shall be sampled and analyzed at least monthly during release periods for radionuclides other than dissolved and entrained noble gases.
- c. The results of the radioactivity analyses shall be used in accordance with the methodology and parameters in this ODCM, to assure that the concentrations at the point of release are maintained within the limits of Requirement 2.2.2 above.

2.2.5 Basis

This requirement ensures that the concentration of radioactive materials released in effluents to unrestricted areas will be less than ten times the concentration levels specified in 10CFR20, Appendix B, Table 2, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in unrestricted areas will result in exposures within (1) the Section II.A design objectives of Appendix I, 10CFR50, to a member of the public, and (2) the limits of 10CFR20.1301(e) to the population. Iodines, noble gases and short-lived particulates ($t_{1/2}$ less than approximately five years) are no longer observed at Big Rock Point (BRP) due to the time period elapsed since permanent shut down.

See Notation c to Table 1-3 for further information on the LLDs referenced in this section.

2.3 LIQUID EFFLUENT DOSE

2.3.1 Applicability

All installed liquid radioactive waste treatment systems have been removed in the plant dismantlement process, after being shown not necessary for maintenance of public doses below two percent of Requirements 2.3.2.a and 2.3.2.b, below. However, effluents purposefully discharged to the lake from surface and groundwater sources will undergo precautionary sampling and analysis for tritium and radionuclides other than dissolved or entrained noble gases.

2.3.2 Requirement

The dose or dose commitment to a member of the public from radioactive materials in liquid effluents released to areas at and beyond the site boundary (see Figure 2-1) shall be limited:

- a. During any calendar quarter: to less than or equal to 1.5 mrem to the total body and to less than or equal to five mrem to any organ, and
- b. During any calendar year: to less than or equal to three mrem to the total body and to less than or equal to 10 mrem to any organ.

2.3.3 Actions

- a. With the calculated dose from the release of radioactive material exceeding any of the above limits, prepare and submit to the Commission within 30 days a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. With projected dose in the next 31 days greater than two percent of the annual limit of Requirement 2.3.2.b, take action to ensure further releases do not exceed the two percent level.

2.3.4 Surveillance Requirements

- a. Cumulative and projected dose contributions for the current calendar quarter and current calendar year for radioactive materials shall be determined in accordance with the methodology and parameters in this ODCM at least once per 31 days.
- b. Projected dose for the next 31 days shall be calculated prior to each batch release, or at least once every 31 days if continuous release is in progress.

2.3.5 Basis

This specification is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10CFR Part 50. The Requirement 2.3.2 for Operation implements the guides set forth in Section II.A of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents to unrestricted areas will be kept "as low as is reasonably achievable." Also, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40CFR141.

The dose calculation methodology and parameters in this ODCM implement the requirements in Section III.A of Appendix I that conformance be shown by calculational procedures based on models and data, such that the actual exposure of the public through appropriate pathways is unlikely to be substantially underestimated.

The methods specified in the ODCM for calculating the doses due to the actual and estimated release rates of radioactive materials in liquid effluents are consistent with the methodology of Regulatory Guide 1.109, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10CFR Part 50, Appendix I, Revision 1, October, 1977 and Regulatory Guide 1.113, Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I, April 1977.

The requirement for action when effluents are projected to exceed two percent of the annual Appendix I guidelines in any 31 days dose due to effluents will be minimized.

3.0 TOTAL FUEL CYCLE DOSE

3.1 APPLICABILITY

Requirement and actions set forth below are applicable when liquid effluent dose exceeds twice the limits of Requirement 1.3.2.a, 1.3.2.b.1), 1.3.2.b.2), 2.3.2.a, or 2.3.2.b of this section.

3.2 REQUIREMENT

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 mrem to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem.

3.3 ACTION

With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Requirements 1.3.2.a, 1.3.2.b.1), 1.3.2.b.2), 2.3.2.a, or 2.3.2.b of this section, calculations should be made including direct radiation contributions from fuel pool systems and from outside storage tanks to determine whether the limits of Requirement 3.2 above have been exceeded. If such is the case:

Prepare and submit to the Commission within 30 days, 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 10CFR20.2203(a)(4), 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 concentrations of radioactive material involved and the cause of the exposure levels or concentrations.

3.4 SURVEILLANCE REQUIREMENTS

- a. Cumulative dose contributions from liquid and gaseous effluents shall be determined to comply with Requirement 3.2 above at a minimum of once per 31 days, and in accordance with the methodology and parameters described in Section II of this ODCM.
- b. Cumulative dose contributions from direct radiation from spent fuel and from radwaste storage shall be determined in accordance with the methodology and parameters in ODCM, Section II, Part 3.2, Assumptions, and 3.3, Dose Calculation.

3.5 BASIS

This specification is provided to meet the dose limitations of 40CFR190 that have been incorporated into 10CFR20 by 46FR18525. The specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant generated radioactive effluents and direct radiation exceed 25 mrem to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem.

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 40CFR190 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 five miles must be considered.

If the dose to any member of the public is estimated to exceed the requirements of 40CFR190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40CFR190 have not already been corrected), in accordance with the provisions of 40CFR190.11 and 10CFR20.2203(a)(4) is considered to be a timely request and fulfills the requirements of 40CFR190 until NRC staff action is completed. The requested variance relates only to the limits of 40CFR190 and shall not apply in any way to the other requirements for dose limitation of 10CFR20, as addressed in Specifications.

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.

4.0 RADIOLOGICAL ENVIRONMENTAL MONITORING

4.1 APPLICABILITY

The requirements and actions for environmental monitoring are applicable until the Final Status Survey (FSS) has been completed in accordance with the License Termination Plan (LTP). However, if any groundwater monitoring well exceeds, or is projected to exceed, 20,000 pCi/l at the time the FSS report is submitted, monitoring of groundwater will continue as specified (see Table 1-1).

4.2 REQUIREMENT

The radiological environmental monitoring program shall be conducted as specified in Table 1-1.

4.3 ACTION

- a. With the radiological environmental monitoring program not being conducted as specified in Table 1-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Section III of this ODCM, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

- b. 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 1-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days 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. When more than one of the radionuclides in Table 1-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{Concentration (1)}}{\text{Reporting Level (1)}} + \frac{\text{Concentration (2)}}{\text{Reporting Level (2)}} + \dots \geq 1.0$$

When radionuclides other than those in Table 1-2 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 is equal to or greater than the calendar year limits of Requirements 1.3.2 or 2.3.2 of ODCM, Section I. 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.

4.4 SURVEILLANCE REQUIREMENTS

- a. The radiological environmental monitoring samples shall be collected and analyzed pursuant to the requirements of Table 1-1 and the detection capabilities required by Table 1-3.
- b. A final land use census was undertaken in the last year of plant operation. No further census data is required.
- c. Analytical Accuracy

Records of instrument calibrations and quality control data for the instrumentation used for environmental analyses shall be maintained. Interlaboratory comparison participation shall be required for off-site environmental sample analyses. Environmental TLD readouts will be performed by an NVLAP-accredited facility.

4.5 BASIS

a. Monitoring Program

The radiological environmental monitoring program required by this specification provides representative measurements of radiation and of radioactive resulting from post-operational conditions. This monitoring program implements Section IV.B.2 of Appendix I to 10CFR50 by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of low effluent levels due to the defueled conditions and the modeling of the environmental exposure pathways.

Upon termination of the current radiological environmental monitoring program, this program may be used to confirm that the Independent Spent Fuel Storage Installation (ISFSI) is meeting the requirements of 10CFR72.104. Specifically, calculated annual doses from plant-generated radioactive effluents and direct radiation, including ISFSI operations, cannot exceed 25 mrem to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem to any real individual beyond the controlled area.

b. Basis, Radiological Monitoring

The iodine and noble gas source terms for the defueled facility are negligible, and particulate release has been reduced more than a thousandfold, compared to power operations. Consequently, off-site sampling of the food chain, and off-site air particulate and iodine sampling for radionuclides normally linked to atmospheric releases have been deleted from the ODCM. Liquid releases during initial stages of decommissioning, although much smaller than during power operation, will continue to be monitored for food chain uptake at the most sensitive indicator location: the lake environment in the area that clarified ground and surface water effluents reach the lake.

Guidance for this monitoring program is provided by the Radiological Assessment Branch Technical Position on Environmental Monitoring. 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 1-3 are considered optimum for routine environmental measurements in industrial laboratories.

c. Land Use Census

A land use census from the final year of plant power operation is provided in ODCM, Section II, Table 2-4, for informational purposes. Use of an assumed garden and milk animal (critical receptors) at the site boundary in the downwind sector of highest D/Q, per ODCM, Section II, Table 2-4, is conservative for ground level release, with respect to any actual garden and milk animal locations.

d. Analytical Accuracy

Participation in an approved Interlaboratory Comparison Program is required for off-site environmental monitoring sample analyses. Analytical accuracy of radioactive material in effluent and other on-site samples is documented in routine calibration and quality control checks in order to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10CFR50. ThermoLuminescent Dosimetry (TLD) readouts are performed by a NVLAP Accredited laboratory in order to assure analytical reliability and accuracy.

TABLE 1-1
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and frequency of Analysis
1. Direct Radiation ^b	21 monitoring stations either with two or more TLDs or one instrument for measuring and recording dose rate continuously, placed as follows ^d : a) Miscellaneous site locations (4) b) A ring of stations (6) at or near the Site boundary c) Balance of stations (3) placed to serve as control stations d) Outside perimeter of ISFSI (4) ^e e) ISFSI protected area fence line (4) ^e	Quarterly	Gamma dose quarterly
2. Waterborne			
a. Lake	1 sample near site	Semiannual (grab)	Tritium and gamma isotopic ^d
b. Well (drinking) and groundwater monitoring wells	1 sample from Site well, if in use, and 1 sample from minimum of 6 monitor wells	Semiannual (grab) Semiannual (grab)	Tritium and gamma isotopic semiannually
3. Biota			
a. Marine	1 fish or invertebrate sample where clarified, detained water enters lake	Semiannual (grab) Apr-Nov	Gamma Isotopic Semiannually
4. Lake Sediment			
a. Shoreline	1 sample where clarified, detained water enters lake	Semiannual (grab) Apr-Nov	Gamma Isotopic Semiannually
b. Shoreline	1 sample each side of 4.a (above), within ~½ mile	Semiannual (grab) Apr-Nov	Gamma Isotopic Semiannually

TABLE 1-1
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Notations

- a. 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 the Reporting Requirements of ODCM, Section III. Alternative media and locations may be chosen for any particular pathway if designated locations or media are not available, and appropriate substitutions are made within 30 days in the radiological environmental monitoring program.
- b. 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. The background dosimetry requirement also may be met through use of dosimeters shared with another facility, or from data provided by another entity, such as the State of Michigan, as appropriate for this site.
- c. Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to licensed materials in the effluents from the facility.
- d. For the purposes of this table, a TLD is considered to be one phosphor; two or more phosphors or phosphor readout zones in a packet are considered as two or more dosimeters.
- e. TLDs designated for ISFSI only operation.

TABLE 1-2
REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS
IN ENVIRONMENTAL SAMPLES

Analysis	Reporting Level	
	Water (pCi/ l)	Fish (pCi/kg)
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	-
Cs-134	30	1,000
Cs-137	50	2,000
Ba-La-140**	200	-

- * For drinking water samples from site domestic water well (20,000 pCi/l is the 40CFR141 value).
- ** Short half-lives of these radionuclides may preclude presence due to plant effluents, but these nuclides may be observed from weapons testing.

TABLE 1-3
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS^a
LOWER LIMIT OF DETECTION (LLD)^{b, c}

Analysis	Water (pCi/-1)	Fish (pCi/kg, wet)	Sediment (pCi/kg, dry)
H-3	2,000	-	-
Mn-54*	15	130	-
Fe-59*	30	260	-
Co-58, 60	15	130	-
Zn-65*	30	260	-
Zr-Nb-95*	15	-	-
I-131*	1 ^d	-	-
Cs-134	15	130	150
Cs-137	18	150	180
Ba-La-140	15	-	-

* Short half-lives of these radionuclides may preclude presence due to plant effluents, but these nuclides may be observed from weapons testing.

Notations

- a. 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 the Reporting Requirements of ODCM, Section III.
- b. Required detection capabilities for thermoluminescent dosimeters used for environmental measurements are given in Regulatory Guide 4.13.
- c. 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 five percent probability of falsely concluding that a blank observation represents a "real" signal.**

**NUREG-0473, Draft Radiological Technical Specifications for BWRs, November 1978.

TABLE 1-3
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS^a
LOWER LIMIT OF DETECTION (LLD)^{b, c}

Notations

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

$$LLD = \frac{4.66 s_b}{E \times V \times 2.22 \times Y \times e^{-\lambda \Delta t}}$$

Where:

- LLD is the predetermined lower limit of detection as defined above, as pico-curies per unit mass or volume.
- s_b is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,
- E is the counting efficiency, as counts per disintegration,
- V is the sample size in units of mass or volume,
- 2.22 is the number of disintegrations per minute per pico-curie,
- Y is the fractional radiochemical yield, when applicable,
- λ is the radioactive decay constant for the particular radionuclide, and
- Δt for environmental samples is the elapsed time between sample collection or end of the sample collection period, and time of counting.

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

- d. LLD for drinking water samples.

5.0 TEMPORARY LIQUID STORAGE IN OUTSIDE TANKS

5.1 REQUIREMENT

The concentration of radioactive material contained in any unprotected outside tank used for temporary liquid radwaste storage shall be limited such that the mixture of radionuclides do not exceed 8000 times the Effluent Concentration (EC) as listed in 10CFR20, Appendix B, Table 2, Column 2.

$$\frac{C_a}{EC_a} + \frac{C_b}{EC_b} + \dots + \frac{C_i}{EC_i} = < 8000$$

5.2 ACTION

With the quantity of radioactive material in any of the tanks exceeding the above concentration, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank activity to within the limit, and describe the events leading to this condition in the next Radiological Effluent Release Report.

5.3 SURVEILLANCE REQUIREMENT

The concentration of radioactive material contained in each tank shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per seven days when radioactive materials are being added to the tank.

An outdoor unprotected liquid storage tank is any vessel which does not have dikes or walls capable of holding the vessel contents, or does not have overflows or drains which route leaks, overflows or other losses back to a containment system. A vessel or container that is intended for use as a containment system or packaging is not considered an outdoor unprotected storage tank.

5.4 BASIS

This requirement will provide reasonable assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations, averaged over not more than one year, would be less than 10 EC per 10CFR20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in the Unrestricted Area (the dilution between BRP and the Charlevoix drinking water supply has been established as 800). Such an uncontrolled release would not exceed the 10CFR20 annual dose limits for the public or 10CFR50, Appendix I guidelines due to the short interval over which that any such release would occur.

6.0 DEFINITIONS AND SURVEILLANCE REQUIREMENT TIME INTERVALS

6.1 APPLICABILITY

Requirements do not apply to equipment removed from service for dismantlement.

6.2 REQUIREMENT

Unless otherwise specified, each surveillance requirement shall be performed with time extensions not to exceed 25%.

6.3 ACTION

A surveillance not performed within the defined interval (including the allowable extension) shall constitute noncompliance with the operability requirements.

6.4 SURVEILLANCE REQUIREMENT

NA

6.5 BASIS

Terms and Surveillance interval extensions are as defined in Defueled Technical Specifications.

VOLUME 25 OFF-SITE DOSE CALCULATION MANUAL
AND RELATED DOCUMENTS
A. OFF-SITE DOSE CALCULATION MANUAL
SECTION II – METHODOLOGIES FOR
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ODCM SECTION II

METHODOLOGIES FOR REQUIREMENTS IMPLEMENTATION

1.0 GASEOUS EFFLUENTS

1.1 CALCULATION OF ALLOWABLE CONCENTRATION AND DOSE

This section of the ODCM describes appropriate methods for determination of allowable concentrations and dose from gaseous effluents.

1.1.1 Allowable Concentration

The total EC-fraction (R) for the release point will be calculated by the relationship defined by Note 1 of Appendix B, 10CFR20.

$$R = \left(\frac{X}{Q} \right) (F) \quad \sum_i \frac{A_i}{EC_i} = \leq 10 \quad (1.1)$$

Where:

- R = The total EC-fraction for the release point.
- X/Q = Most conservative sector site boundary dispersion (8.10E-08 sec/m; for ground level releases from Table 2-4).
- F = Release flow rate cubic feet per minute (cfm).
- A_i = The measured or calculated concentration, at ambient temperature and pressure, of nuclide i (μCi/cc) at the release point.
- EC_i = The EC of nuclide i from 10CFR20, Appendix B.

1.1.2 Monitor Response

Due to lack of installed instrumentation, this section has been deleted.

1.2 DOSE CALCULATION

1.2.1 Dose Pathway Analyses

Doses are calculated for radionuclides detected in accordance with the analytical requirements of ODCM, Section I. All dose pathways of major importance in the BRP environs are considered. Dose calculation is by direct use of the NRC-approved GASPARG computer program, or by use of the constants of Table 2-6. Site-specific parameters for GASPARG use in such analyses are provided in Tables 2-4 and 2-5.

1.2.2 Equations for Determining Air Concentration

a. For determining the air concentration at distance x:

$$X_i = \sum_{j=1}^7 \sum_{k=1}^7 \left(\frac{2}{\pi}\right)^{1/2} \frac{f_{jk} Q_i P}{\sum_{zk} u_j \left(\frac{2\pi x}{n}\right)} \exp\left(-\lambda_i \frac{x}{u_j}\right) \exp\left(\frac{-h^2}{2\sigma_{zk}^2}\right) \quad (1.3)$$

Where:

- X_i = Air concentration of radionuclide i, $\mu\text{Ci}/\text{m}^3$;
- f_{jk} = Joint relative frequency of occurrence of winds in wind speed class j, stability class k, blowing toward this exposure point, expressed as a fraction.
- Q_i = Average release rate of radionuclide i, $\mu\text{Ci}/\text{s}$.
- P = Fraction of radionuclide remaining in plume.
- \sum_{zk} = Vertical dispersion coefficient for stability class k (m).
- u_j = Midpoint value of wind speed class interval j, m/s.
- x = Downwind distance, m.
- n = Number of sectors, 16.
- λ_i = Radioactive decay coefficient of radionuclide i, s^{-1} .
- $2Ex/n$ = Sector width at point of interest, m.

- h = Release height (formerly 73 meters).
 σ_{zk}^2 = Vertical dispersion coefficient of stability class k.

b. Special Case for Ground Level Release with Unknown Release Rate

When dismantlement of significantly contaminated structures (those with surface contamination levels greater than ten times the Table 1, Acceptable Surface Contamination Levels, of Regulatory Guide 1.86) occurs in such a way that contaminated dust is released to the environment, there may be no identifiable release rate (parameter Q_i of Equation 1.2) by which calculations may be performed using the previously discussed methods. However, by use of Figure 2-2, particulate air concentration at the site boundary may be calculated from Equation 1.3:

$$X_{id2} = (X_{id1}) (X/Q)_{d2} / (X/Q)_{d1}^* \quad (1.3)$$

And

$$Q_i = X_{id2} / (X/Q)_{d2} \quad (1.4)$$

Where:

- X_{id2} = Site boundary air concentration ($\mu\text{Ci}/\text{m}^3$)
 X_{id1} = Measured air concentration at distance d_1 from source (typically from downwind portable air sampler), in $\mu\text{Ci}/\text{m}^3$
 $(X/Q)_{d2}$ = Dispersion constant at site boundary (ground level value from Table 2-4)
 $(X/Q)_{d1}$ = Dispersion constant at sample point (from Figure 2-2)
 Q_i = Release Rate ($\mu\text{Ci}/\text{sec}$)

* $(X/Q)_{d2} / (X/Q)_{d1} = 9.4\text{E}-04$ may be used as default for dilution to site boundary for samples taken within work areas.

1.2.2 Design Basis Quantities

The design basis quantity (DBQ) of a radionuclide emitted to the atmosphere is the amount of that nuclide, when released in one year, which would result in a dose not exceeding any of the following:

- a. The 10CFR50 Appendix I limit of 15 millirems to any organ of an individual from iodines and particulates with half-life greater than eight days.
- b. Fifteen-millirad air dose for beta radiation from noble gas (this is conservatively less than the 10CFR50 Appendix I limit of 20 millirad).
- c. Five-millirad air dose for gamma radiation from noble gas (this is conservatively less than the 10CFR50 Appendix I limit of 10 millirad).

Design basis quantity values corresponding to the above annual limits are provided in Table 2-9. Design basis quantity (Ci) is the smallest value for each nuclide, calculated by dividing the dose limits (as indicated in Sections 1.2.2.a through 1.2.2.c above) by the appropriate dose calculated in Section 1.2; the result then is multiplied by the amount of radionuclide (Ci) used to conservatively estimate the doses as listed in Table 2-1 (or assumed a hypothetical 1 Ci/year for nuclides not actually present):

$$DBQ = \frac{D_{Al}}{D_c} (C_c) \quad (1.5)$$

Where:

- D_{AI} = Appendix I dose limit for organ dose (mrem) and conservative values less than the Appendix I limits as specified in b. and c. above for beta and gamma air dose (mrad).
- D_C = Calculated dose from GASPAR.
- C_C = Quantity of nuclide resulting in dose D_C (Ci).
- DBQ = Design Basis Quantity (Ci). The limiting values for Design Basis Quantities for radionuclides released to the atmosphere are given in Table 2-6.

The inverse of the ratio C_C/D_C in the above equation (i.e., D_C/C_C) is a useful value, since it represents the most limiting dose per unit quantity of each nuclide released.

1.3 DESIGN BASIS QUANTITY (DBQ) LIMITS

1.3.1 Design Basis Quantity Fraction

Per Specification 2.3 of ODCM, Section I, the cumulative DBQ fraction for nuclides released is summed at least every 31 days (or alternatively, GASPAR may be run) to assure that the sum of the fractions of all nuclides released does not exceed 1.0 year to date or 0.5 in any calendar quarter, and forecast not to exceed 0.02 over the next 31 days. Forecasts should be based on historical performance, consideration of upcoming scheduled tasks and operational parameters, or a combination of factors. The equation for forecasting the cumulative dose by means of DBQs is provided below.

$$\sum_i \frac{A_i}{(DBQ)_i} < 1.0 \text{ Annual, } < 0.5 \text{ Quarter, } < 0.02 \text{ Next 31 Day} \quad (1.6)$$

Where:

- A_i = Activity of nuclide i
- $(DBQ)_i$ = Design Basis Quantity of nuclide i

1.3.2 Exceeding DBQ Limits

The DBQ is a very conservative estimate of activity which could give doses at 10CFR50, Appendix I limits. Because different organs are summed together and doses to different individuals are summed, the DBQ typically overestimates dose by about a factor of five. Thus, if calculations of the DBQ fraction exceed 1.0 for year to date, 0.5 for the quarter, or 0.02 forecast for the following 31 days, an accurate assessment of dose should be made by use of the NRC GASPARG computer code (either by running the code or by normalizing a prior run's dose output on a nuclide by nuclide basis). If GASPARG is not utilized to determine accurate doses, Actions of Specifications 2.3 or 3.3, ODCM, Section I, shall be performed based on the conservative DBQ fraction results of Equation 1.6.

1.3.3 Releasing Radionuclides not Listed in Table 2-6

Table 2-6 contains all nuclides identified to date as routine constituents of gaseous releases at BRP Plant, plus those common to boiling water reactors in general, even if not previously detected at BRP. From time to time, however, other nuclides may be detected.

If the unlisted nuclide constitutes less than ten percent of the EC-fraction for the release, and all unlisted nuclides total less than 25% of the EC-fraction, the nuclide may be considered not present. If the unlisted nuclide constitutes greater than ten percent of the EC-fraction, or all unlisted nuclides together constitute greater than 25%, then each nuclide should be assigned a DBQ equal to the most conservative value listed for the physical form of the nuclide involved (noble gas, halogen or particulate).

Should a nuclide not listed in Table 2-6 begin to appear in significant quantities (in concentrations greater than ten percent of its EC) on a routine basis, revision to this ODCM should be made in order to include a design basis quantity specific to that nuclide.

1.4 GASEOUS RADWASTE TREATMENT SYSTEM OPERATION

1.4.1 System Description

The gaseous radwaste system has been removed during the dismantlement process.

1.5 OFF-SITE RELEASE RATE

10CFR50.36a requires that the release of radioactive materials be kept as low as reasonably achievable. Appendix I to 10CFR50 provides the numerical guidelines on limiting conditions for operation to meet the as low as reasonably achievable requirement.

The GASPARG code has been run to determine a conservative relationship between release rate in Ci/sec and annual dose due to external radiation and inhalation. The source term used is listed in Table 2-1. Dose using annual average meteorology, to the individual with most limiting off-site dose (whole body) assumed to be residing at the residence with highest X/Q, is 0.105 mrem for one year. The release rate which would result in a dose equivalent of 500 mrem/y (using the total body limit upon which ODCM, Section I Requirement 3.1 is based) is the Curies/Year given in Table 2-1 ($1.29E04$) multiplied by $500/0.105$ or 1.95 Ci/sec.

The above is a one-time calculation during power operation and is informational only. Methods of exposure calculations to be used for specific releases over specific periods are described in Section II, Part 1.2.

1.6 PARTICULATE SAMPLING

Particulate samples are obtained from the continuous air monitors and grab samples from another areas of potential airborne radioactivity utilized through the course of decommissioning for work area monitoring.

Gamma and beta counting is performed on particulate filters. Beta yields of the gamma isotopes detected on individual particulate filters at the time of sampling are applied to determine "identified" beta, and after suitable decay time for decay of radon and thoron daughters, the "identified" count rate is subtracted from the observed count rate to give "unidentified" beta. The "unidentified" beta is assumed to be Sr-90 until results of an optional analysis specific to Sr-90 (from a quarterly composite of filters) are obtained. Alternatively, Cs-137, if detected, may be utilized as a surrogate for Sr-90, with Sr-90 equal to 3.0% of the Cs-137 value.

1.7 NOBLE GAS MONITORING AND SAMPLING

Noble gas monitoring and sampling are no longer required, since all spent fuel is stored at the ISFSI facility in hermetically sealed containers.

1.8 TRITIUM SAMPLING

Tritium has a low dose consequence to the public because of the very small fraction of allowable quantity which is available for release. The major contributor to tritium gaseous effluents is evaporation from the barrels of groundwater that are evaporated rather than released as liquid, due to detectable gamma radioactivity levels (contamination sometimes occurs from contact with plant equipment and structural materials during dismantlement operations). Because of the low dose impact, and due to the continuous reduction in tritium source term since cessation of reactor operation, gaseous tritium sampling will not be required. Gaseous tritium release is estimated using conservative evaporation rate calculations from the fuel pool (702 uCi/day) at a time when its water contained significant levels of tritium.

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TABLE 2-1
BIG ROCK POINT GASEOUS AND LIQUID SOURCE TERMS, CURIES/YEAR ⁽¹⁾

<u>Nuclide</u>	<u>Gaseous</u>	<u>Liquid</u>	<u>Nuclide</u>	<u>Gaseous</u>	<u>Liquid</u>
H-3	1.21E+01	8.63E+00	Sb-124	NA	4.01E-04
N-13	1.53E+03	NA	I-131	1.94E-03	1.57E-04
Na-24	3.52E-04	1.12E-06	Xe-131m	4.38E-01	NA
Cr-51	2.82E-04	6.84E-03	I-132	8.07E-03	NA
Mn-54	5.50E-05	2.60E-02	I-133	1.99E-02	NA
Mn-56	1.70E-04	NA	Xe-133	2.01E+02	8.86E-05
Co-58	1.65E-06	6.17E-04	Xe-133m	6.00E+00	NA
Fe-59	2.81E-06	9.05E-03	Cs-134	4.04E-07	1.75E-02
Co-60	1.89E-04	4.21E-02	I-134	1.24E-02	NA
Zn-65	3.16E-05	9.01E-04	I-135	3.00E-02	NA
Br-82	8.11E-03	NA	Xe-135	1.11E+03	NA
Kr-83m	2.61E+02	NA	Xe-135m	1.15E+03	NA
Kr-85	9.55E-01	NA	Cs-136	4.74E-05	NA
Kr-85m	3.12E+02	NA	Cs-137	1.51E-04	2.04E-01
Kr-87	1.19E+03	NA	Xe-137	1.11E+03	NA
Kr-88	7.80E+02	NA	Cs-138	3.17E-01	NA
Kr-89	6.96E+02	NA	Xe-138	6.03E+03	NA
Sr-89	NA	2.27E-04	Ba-139	1.32E-03	NA
Kr-90	7.76E+02	NA	Xe-139	1.04E+03	NA
Sr-90	NA	2.22E-03	Ba-140	1.86E-03	NA
Kr-91	6.68E+00	NA	La-140	7.80E-03	5.04E-05
Sr-91	5.61E-03	NA	Xe-140	7.23E+01	NA
Sr-92	NA	1.54E-06	Hg-203	1.32E-06	NA
Nb-95	1.91E-06	NA	Np-239	1.44E-04	NA
Mo-99	3.10E-05	NA	Unidentified		
Ag110m	1.57E-05	6.88E-05	Beta	2.42E-03	6.76E-02

⁽¹⁾ Operating plant data derived from taking the effluents released during January-June 1980 through July-December 1983 and dividing by four. "NA" indicates that the nuclide was not detected in that effluent stream.

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TABLE 2-2
 BASIC RADIONUCLIDE DATA

	<u>NUCLIDE</u>	<u>HALF-LIFE</u> (days)	<u>LAMBDA</u> (1/s)	<u>BETA</u> ¹ (MEV/DIS)	<u>GAMMA</u> ¹ (MEV/DIS)
1	Tritium	4.49E 03	1.79E-09	5.68E-03	0.0
2	C-14	2.09E 06	3.84E-12	4.95E-02	0.0
3	N-13	6.94E-03	1.16E-03	4.91E-01	1.02E 00
4	O-19	3.36E-04	2.39E-02	1.02E 00	1.05E 00
5	F-18	7.62E-02	1.05E-04	2.50E-01	1.02E 00
6	Na-24	6.33E-01	1.273-05	5.55E-01	4.12E 00
7	P-32	1.43E 01	5.61E-07	6.95E-01	0.0
8	Ar-41	7.63E-02	1.05E-04	4.64E-01	1.28E 00
9	Cr-51	2.78E 01	2.89E-07	3.86E-03	3.28E-02
10	Mn-54	3.03E 02	2.65E-08	3.80E-03	8.36E-01
11	Mn-56	1.07E-01	7.50E-05	8.29E-01	1.69E 00
12	Fe-59	4.50E 01	1.78E-07	1.18E-01	1.19E 00
13	Co-58	7.13E 01	1.12E-07	3.41E-02	9.78E-01
14	Co-60	1.92E 03	4.18E-09	9.68E-02	2.50E 00
15	Zn-69m	5.75E-01	1.39E-05	2.21E-2	4.16E-01
16	Zn-69	3.96E-02	2.03E-04	3.19E-01	0.0
17	Br-84	2.21E-02	3.63E-04	1.28E 00	1.77E 00
18	Br-85	2.08E-03	3.86E-03	1.04E 00	6.60E-02
19	Kr-85m	1.83E-01	4.38E-05	2.53E-01	1.59E-01
20	Kr-85	3.93E 03	2.04E-09	2.51E-01	2.21E-03
21	Kr-87	5.28E-02	1.52E-04	1.32E 00	7.93E-01
22	Kr-88	1.17E-01	6.86E-05	3.61E-01	1.96E 00
23	Kr-89	2.21E-03	3.63E-03	1.36E 00	1.83E 00
24	Rb-88	1.24E-02	6.47E-04	2.06E 00	6.26E-01
25	Rb-89	1.07E-02	7.50E-04	1.01E 00	2.05E 00
26	Sr-89	5.20E 01	1.54E-07	5.83E-01	8.45E-05
27	Sr-90	1.03E 04	7.79E-10	1.96E-01	0.0
28	Sr-91	4.03E-01	1.99E-05	6.50E-01	6.95E-01
29	Sr-92	1.13E-01	7.10E-05	1.95E-01	1.34E 00
30	Sr-93	5.56E-03	1.44E-03	9.20E-01	2.24E 00
31	Y-90	2.67E 00	3.00E-06	9.36E-01	0.0
32	Y-91m	3.47E-02	2.31E-04	2.73E-02	5.30E-01
33	Y-91	5.88E 01	1.36E-07	6.06E-01	3.61E-03
34	Y-92	1.47E-01	5.46E-05	1.44E 00	2.50E-01
35	Y-93	4.29E-01	1.87E-05	1.17E 00	8.94E-02
36	Zr-95	6.50E 01	1.23E-07	1.16E-01	7.35E-01
37	Nb-95m	3.75E 00	2.14E-06	1.81E-01	6.06E-02
38	Nb-95	3.50E 01	2.29E-07	4.44E-02	7.64E-01

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TABLE 2-2
BASIC RADIONUCLIDE DATA

	<u>NUCLIDE</u>	<u>HALF-LIFE</u> (days)	<u>LAMBDA</u> (1/s)	<u>BETA</u> ¹ (MEV/DIS)	<u>GAMMA</u> ¹ (MEV/DIS)
39	Mo-99	2.79E 00	2.87E-06	3.96E-01	1.50E-01
40	Tc-99m	2.50E-01	3.21E-05	1.56E-02	1.26E-01
41	Tc-99	7.74E 07	1.04E-13	8.46E-02	0.0
42	Tc-104	1.25E-02	6.42E-04	1.60E 00	1.95E 00
43	Ru-106	3.67E 02	2.19E-08	1.01E-02	0.0
44	Te-132	3.24E 00	2.48E-06	1.00E-01	2.33E-01
45	I-129	6.21E 09	1.29E-15	5.43E-02	2.46E-02
46	I-131	8.05E 00	9.96E-07	1.90E-01	3.81E-01
47	I-132	9.58E-02	8.37E-05	4.89E-01	2.24E 00
48	I-133	8.75E-01	9.17E-06	4.08E-01	6.02E-01
49	I-134	3.61E-02	2.22E-04	6.16E-01	2.59E 00
50	I-135	2.79E-01	2.87E-05	3.68E-01	1.55E 00
51	Xe-131m	1.18E 01	6.80E-07	1.43E-01	2.01E-02
52	Xe-133m	2.26E 00	3.55E-06	1.90E-01	4.15E-02
53	Xe-133	5.27E 00	1.52E-06	1.35E-01	4.60E-02
54	Xe-135m	1.08E-02	7.43E-04	9.58E-02	4.32E-01
55	Xe-135	3.83E-01	2.09E-05	3.17E-01	2.47E-01
56	Xe-137	2.71E-03	2.96E-03	1.77E 00	1.88E-01
57	Xe-138	9.84E-03	8.15E-04	6.65E-01	1.10E 00
58	Cs-134	7.48E 02	1.07E-08	1.63E-01	1.55E 00
59	Cs-135	1.10E 09	7.29E-15	5.63E-02	0.0
60	Cs-136	1.30E 01	6.17E-07	1.37E-01	2.15E 00
61	Cs-137	1.10E 04	7.29E-10	1.71E-01	5.97E-01
62	Cs-138	2.24E-02	3.58E-04	1.20E 00	2.30E 00
63	Ba-139	5.76E-02	1.39E-04	8.96E-01	3.53E-02
64	Ba-140	1.28E 01	6.27E-07	3.15E-01	1.71E-01
65	La-140	1.68E 00	4.77E-06	5.33E-01	2.31E 00
66	Ce-144	2.84E 02	2.82E-08	9.13E-02	1.93E-02
67	Pr-143	1.36E 01	5.90E-07	3.14E-01	0.0
68	Pr-144	1.20E-02	6.68E-04	1.21E 00	3.18E 02
69	Eu-152	4.84E 03	1.66E-09	8.22E-02	1.06E 00

¹ Average energy per disintegration values were obtained from ICRP Publication Number 38, Radionuclide Transformations: Energy and Intensity of Emissions, 1983 and NUREG/CR-1413 (ORNL/NUREG-70), A Radionuclide Decay Data Base - Index and Summary Table, D.C. Kocher, May 1980.

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TABLE 2-3

USNRC COMPUTER CODE – XOQDOQ, VERSION 2.0 RUN DATE: 940629
 **** BIG ROCK POINT X0QD0Q82 *** USING 01/01/89 – 12/31/93 MET DATA ****
 ELEVATED RELEASE – 240' STACK

RELEASE ID	TYPE OF LOCATION	DIRECTION	DISTANCE FROM SITE		X/Q (SEC/M ³)			D/Q (PER SQ. METER)
			(MILES)	(METERS)	NO DECAY UNDEPLETED	2.26 D DECAY UNDEPLETED	8.0 D DECAY DEPLETED	
A	SITE BOUNDARY	E	0.57	917.	4.91E-08	4.90E-08	4.85E-08	1.25E-09
A	SITE BOUNDARY	ESE	0.52	837.	4.11E-08	4.10E-08	4.07E-08	1.16E-09
A	SITE BOUNDARY	SE	0.55	885.	3.09E-08	3.08E-08	3.05E-08	8.19E-10
A	SITE BOUNDARY	SSE	0.58	933.	2.25E-08	2.24E-08	2.22E-08	5.12E-10
A	SITE BOUNDARY	S	0.68	1094.	2.07E-08	2.06E-08	2.03E-08	3.68E-10
A	SITE BOUNDARY	SSW	0.71	1143.	1.95E-08	1.94E-08	1.91E-08	3.65E-10
A	SITE BOUNDARY	SW	0.50	805.	3.58E-09	3.57E-09	3.55E-09	1.16E-10
A	MAXIMUM CHI/Q	S	2.00	3219.	3.37E-08	3.35E-08	3.31E-08	1.34E-10
A	MAXIMUM CHI/Q	SSW	2.00	3219.	2.73E-08	2.71E-08	2.67E-08	1.31E-10
A	MAXIMUM CHI/Q	SW	2.50	4023.	1.85E-08	1.84E-08	1.82E-08	3.84E-11
A	MAXIMUM CHI/Q	WSW	50.00	80467.	0.00E+00	0.00E+00	0.00E+00	0.00E+00
A	MAXIMUM CHI/Q	W	50.00	80467.	0.00E+00	0.00E+00	0.00E+00	0.00E+00
A	MAXIMUM CHI/Q	WNW	15.00	24140.	1.12E-07	7.29E-08	8.26E-08	1.30E-10
A	MAXIMUM CHI/Q	NW	50.00	80467.	0.00E+00	0.00E+00	0.00E+00	0.00E+00
A	MAXIMUM CHI/Q	NNW	50.00	80467.	0.00E+00	0.00E+00	0.00E+00	0.00E+00
A	MAXIMUM CHI/Q	N	50.00	80467.	0.00E+00	0.00E+00	0.00E+00	0.00E+00
A	MAXIMUM CHI/Q	NNE	2.00	3219.	4.47E-08	4.46E-08	4.43E-08	1.90E-10
A	MAXIMUM CHI/Q	NE	1.50	2414.	4.63E-08	4.62E-08	4.54E-08	5.46E-10
A	MAXIMUM CHI/Q	ENE	1.50	2414.	5.32E-08	5.30E-08	5.22E-08	5.79E-10
A	MAXIMUM CHI/Q	E	1.00	1609.	5.40E-08	5.39E-08	5.30E-08	8.96E-10
A	MAXIMUM CHI/Q	ESE	0.75	1207.	4.29E-08	4.28E-08	4.21E-08	9.15E-10
A	MAXIMUM CHI/Q	SE	1.50	2414.	3.40E-08	3.38E-08	3.32E-08	3.60E-10
A	MAXIMUM CHI/Q	SSE	1.50	2414.	3.59E-08	3.58E-08	3.52E-08	2.57E-10

VENT AND BUILDING PARAMETERS:

RELEASE HEIGHT (METERS) 73.10 REP. WIND HEIGHT (METERS) 71.3

NOTE: Big Rock Point meteorological data was gathered from sensors mounted on the 73-meter stack. Sensors were mounted into the prevailing wind direction. Because of interference to the wind flow by the stack when winds were from the 71E to 159E (east, towards Lake Michigan), the meteorological data recorded in these sectors are considered invalid. For dose calculational purposes, this effectively invalidates six (6) lakeward sectors (WSW, W, WNW, NW, NNW, and N). Therefore zeros are recorded in Table 2-3 for these sectors. However, the program which calculates the annual average X/Q (Chi/Q) requires input of the full years met data. Any data recorded for these six sectors are input in the WNW sector to satisfy the program. Values of X/Q listed in the WNW sector are invalid.

TABLE 2-4
CONSERVATIVE BIG ROCK POINT GASPAR INPUT PARAMETERS

Critical Receptors

<u>Location</u>	<u>Release Type</u>	<u>Sector</u>	<u>Distance (miles)</u>	<u>X/Q (sec/m.)</u>	<u>X/Q Decay (sec/m.)</u>	<u>X/Q Decay and Dep (sec/m.)</u>	<u>D/Q (1/m5)</u>
Residence/ Garden	Stack	E	0.57	4.91E-08	4.90E-08	4.85E-08	1.25E-09
	Ground	E	0.57	8.10E-08	8.09E-08	8.00E-08	2.06E-09
Site Boundary	Stack	E	0.57	4.91E-08	4.90E-08	4.85E-08	1.25E-09
	Ground	E	0.57	8.10E-08	8.09E-08	8.00E-08	2.06E-09
Beef Cattle	Stack	E	0.57	4.91E-08	4.90E-08	4.85E-08	1.25E-09
	Ground	E	0.57	8.10E-08	8.09E-08	8.00E-08	2.06E-09
Dairy Cow	Stack	E	0.57	4.91E-08	4.90E-08	4.85E-08	1.25E-09
	Ground	E	0.57	8.10E-08	8.09E-08	8.00E-08	2.06E-09

NOTE: Long term X/Q and D/Q values for ground level release have been calculated for this table and for Figure 2-2 by multiplying the ratio of the elevated (stack) long term to short term X/Q at 0.57 miles times the short term ground level X/Q at various distances (in Table 2-4 above only at 0.57 miles).

Final (1998) Land Use Census illustrates actual land use:

<u>Sector</u>	<u>Residence</u>	<u>Garden</u>	<u>Dairy Cow</u>	<u>Beef Cattle</u>	<u>Goat</u>
WSW	2.5 mi	>5 mi	>5 mi	>5 mi	>5 mi
SW	1.1 mi	2.7 mi	>5 mi	>5 mi	>5 mi
SSW	1.3 mi	>5 mi	>5 mi	>5 mi	>5 mi
S	1.9 mi	2.1 mi	>5 mi	>5 mi	>5 mi
SSE	1.7 mi	1.7 mi	>5 mi	1.7 mi	>5 mi
SE	1.8 mi	1.8 mi	4.5 mi	1.7 mi	>5 mi
ESE	1.5 mi	1.8 mi	>5 mi	3.2 mi	>5 mi
E	1.4 mi	2.4 mi	3.5 mi	3.2 mi	>5 mi
ENE	2.3 mi	>5 mi	>5 mi	>5 mi	>5 mi

TABLE 2-5
BIG ROCK POINT SITE-SPECIFIC PARAMETERS FOR GASPAR

891.0	=	Meters from facility to the NE corner of US 31*
0.33	=	Fraction of year leafy vegetables are grown
0.58	=	Fraction of year cows are on pasture
0.76	=	Default value fraction of crop from garden
1.0	=	Default value fraction of daily intake of cows, goats and beef cattle derived from pasture while on pasture
2,160	=	Hours hold-up for stored feed
50	=	Kg/d feed consumed by cow and beef cattle
0.67	=	Fraction of year goats are on pasture
6.0	=	Kg/d feed consumed by goat
0.58	=	Fraction of year beef cattle are on pasture
2.0	=	Days transport time from feed to milk receptor

*NOTE: Independent Spent Fuel Storage Installation is located 300 meters from site boundary, but source of gaseous effluents is plant dismantlement, not release from ISFSI. Fuel containers at ISFSI are hermetically sealed, and provide no detectable gaseous effluent.

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TABLE 2-6
BIG ROCK POINT GASEOUS DESIGN OBJECTIVE ANNUAL QUANTITIES
BASED ON TABLE 2-4 CRITICAL RECEPTORS FOR STACK RELEASE

<u>Nuclide</u>	<u>Organ</u>	<u>Dose Factor</u> mrem/Ci	<u>Design Objective</u> Annual Quantity (Ci)
H-3	Total Body - C	1.06E-05	4.72E+05
C-14	Bone - C	8.70E-03	1.72E+03
Cr-51	GI Tract - T	7.03E-04	2.13E+04
Mn-54	GI Tract - T	9.00E-02	1.67E+02
Fe-55	Bone - C	4.15E-02	3.61E+02
Co-58	GI Tract - T	4.25E-02	3.53E+02
Fe-59	GI Tract - T	7.37E-02	2.04E+02
Co-60	GI Tract - T	1.00E+00	1.50E+01
Zn-65	Total Body - C	2.82E-01	1.77E+01
Sr-89	Bone - C	1.42E+00	1.06E+01
Sr-90	Bone - C	5.55E-01	2.70E-01
Zr-95	GI Tract - T	8.85E-02	1.69E+02
Sb-124	GI Tract - T	1.59E-01	9.43E+01
Ar-41	Total Body	9.07E-06	5.51E+05
Kr-83m	Skin	2.20E-08	6.82E+08
Kr-85	Skin	2.21E-06	6.79E+06
Kr-85m	Total Body	1.24E-06	4.03E+06
Kr-87	Skin	2.07E-05	7.25E+05
Kr-88	Total Body	1.54E-05	3.25E+05
Kr-89	Total Body	2.27E-06	2.20E+06
Xe-131m	Skin	9.29E-07	1.16E+07
Xe-133	Total Body	3.20E-07	1.56E+07
Xe-133m	Skin	1.94E-06	7.73E+06
Xe-135	Total Body	1.95E-06	2.56E-06
Xe-135m	Total Body	2.22E-06	2.25E+06
Xe-137	Skin	3.80E-06	3.95E+06
Xe-138	Total Body	6.02E-06	8.31E+05
I-131	Thyroid - I	1.11E+01	1.35E+00
I-133	Thyroid - I	1.08E-01	1.39E+02
Cs-134	Liver - C	2.10E+00	7.14E+00
Cs-136	Total Body - I	5.04E-02	9.92E+01
Cs-137	Bone - C	2.14E+00	7.01E+00
Ba-140	Bone - C	1.07E-02	1.40E+03
Ce-141	GI Tract - T	2.10E-02	7.15E+02
Ce-144	GI Tract - T	5.02E-01	2.99E+01
N-13	Total Body - C	6.81E-08	7.34E+07
Na-24	Total Body - I	8.19E-04	6.11E+03
Mn-56	GI Tract - C	2.16E-04	6.94E+04
Co-57	GI Tract - T	1.47E-02	1.02E+03
Ni-63	Bone - C	2.54E+00	8.45E+00
Ni-65	GI Tract - T	1.35E-04	1.11E+05

TABLE 2-6
BIG ROCK POINT GASEOUS DESIGN OBJECTIVE ANNUAL QUANTITIES
BASED ON TABLE 2-4 CRITICAL RECEPTORS FOR STACK RELEASE

CAUTION: To obtain ground-level release dose factors, multiply Table 2-6 values by 1.65.
 To obtain ground-level release design objective annual quantities, multiply by 0.61.

<u>Nuclide</u>	<u>Organ</u>	<u>Dose Factor</u> <u>mrem/Ci</u>	<u>Design Objective Annual</u> <u>Quantity (Ci)</u>
Br-82	Total Body – I	4.73E-03	1.06E+03
Rb-88	Total Body – C	1.29E-06	3.88E+06
Sr-91	Bone – I	6.23E-02	2.41E+02
Sr-92	GI Tract – C	3.88E-04	3.87E+04
Nb-95	GI Tract – A	1.79E-01	8.38E+01
Mo-99	Kidney – I	6.81E-03	2.20E+03
Tc-99	GI Tract – A	5.47E-01	2.74E+01
Tc-99m	GI Tract – T	1.67E-05	8.98E+05
Ru-103	GI Tract – A	2.66E-01	5.64E+01
Ru-105	GI Tract – C	1.74E-04	8.62E+04
Sb-125	GI Tract – T	7.05E-02	2.13E+02
Te-127	GI Tract – T	1.31E-04	1.15E+05
I-129	Thyroid – A	7.41E+01	2.02E-01
I-132	Thyroid – C	3.09E-04	4.85E+04
I-134	Thyroid – C	7.69E-05	1.95E+05
I-135	Thyroid – C	1.40E-03	1.07E+04
La-140	GI Tract – A	2.42E-03	6.20E+03
Tc-101	GI Tract – I	8.94E06	1.68E+06
Ag-110m	GI Tract – T	9.17E-01	1.64E+01
Cs-138	Total Body – C	1.16E-02	4.31E+02
Ba-139	GI Tract – C	8.59E-05	1.75E+05
Eu-152	Skin	8.19E-01	1.83E+01
Np-239	GI Tract – A	6.27E-04	2.39E+04
Pu-238	Bone – T	3.75E+01	4.00E-01
Pu-239	Bone – T	4.34E+01	3.46E-01
Pu-241	Bone – T	9.17E-01	1.64E+01
Am-241	Bone – T	1.51E+01	9.93E-01
Cm-242	Lung – T	8.32E-01	1.80E+01
Cm-244	Bone – T	9.70E+00	1.54E+00

NOTE: Ground-level releases result in doses that are 1.65 times the doses from stack releases.

2.0 LIQUID EFFLUENTS

2.1 ALLOWABLE CONCENTRATION

2.1.1 ODCM Requirement

Requirement 2.2.2 of ODCM, Section I specifies that the concentration of radioactive material released at any time from the site to unrestricted areas shall be limited to ten times the effluent concentration specified in 10CFR20, Appendix B, Table 2, Column 2 for nuclides other than dissolved or entrained noble gases. Plant effluents contain no more dissolved or entrained noble gases. The following approach will be used.

2.1.2 Pre-release Analysis

Prior to first release for a season from water detained for sedimentation, a grab sample will be obtained and analyzed.

2.1.3 Total Release-fraction

The total release-fraction (R_j) will be calculated by the relationship defined as:

$$R_j = \sum_{i=1}^n \frac{C_{ij}}{10 \times EC_i} \quad (2.1)$$

Where:

C_{ij} = Undiluted effluent concentration of radionuclide i , as determined in Section II, Part 2.1.2, $\mu\text{Ci/ml}$, at release point j .

EC_i = The 10CFR20 effluent concentration limit (EC) of radionuclide i , as specified in Section II, Part 2.1.1, $\mu\text{Ci/ml}$ (Big Rock Point still uses MPC terminology in some Liquid Analyses Programs, although EC values are utilized).

R_j = The total release-fraction for the release point.

2.2 INSTRUMENT ALARM SET POINTS

No installed monitors are required.

2.3 LIQUID EFFLUENT DOSE CALCULATION

2.3.1 Applicability

This section provides methodology for calculating doses in compliance with Section I, Requirement 2.3.2.

2.3.2 Calculation of Design Basis Quantity Fraction

Calculations shall be performed according to the formula:

$$\sum_i \frac{A_i}{(DBQ)_i} = \text{Fraction of DBQ} \quad (2.2)$$

Where:

A_i = Cumulative or projected 31-day, quarterly or annual activity of nuclide i identified or expected in liquid release (Ci).

$(DBQ)_i$ = Design objective annual quantity of radionuclide i from Table 2-8 (Ci).

2.3.3 Use of LADTAP

As an alternative to use of the DBQ fraction, the NRC LADTOP code may be run to confirm that ODCM, Requirement 2.3.2 of ODCM, Section I has been met.

2.3.4 Dose Calculation

Values for the design basis quantities (C_i), and the dose per curie (D_C/C_C)_i for each nuclide i shown in Table 2-8, were calculated by use of LADTAP. Site-specific values for LADTAP runs are found in Tables 2-8 and 2-9.

F = Amount of fish eaten per year; adult - 21 kg, teen - 16 kg, child - 6.9 kg and infant - none.

15 = Dispersion factor from discharge to fish exposure point.

Releasing Radionuclides Not Listed in Table 2-9

Table 2-9 contains all nuclides identified to date as routine constituents of liquid releases at BRP Plant, plus those common to boiling water reactors in general, even if not previously detected at BRP. From time to time, however, other nuclides may be detected.

If the unlisted nuclide constitutes less than ten percent of the EC-fraction for the release, and all unlisted nuclides total less than 25% of the EC-fraction, the nuclide may be considered not present.

If the unlisted nuclide constitutes greater than ten percent of the EC-fraction, or all unlisted nuclides together constitute greater than 25%, then each nuclide should be assigned a DBQ equal to the most conservative value listed for the physical form of the nuclide involved.

Should a nuclide not listed in Table 2-9 begin to appear in significant quantities on a routine basis, revision to this ODCM should be made in order to include a design basis quantity specific to that nuclide.

2.3.5 Annual Analysis

A complete analysis utilizing the NRC computer code LADTAP (either by running the code, or by normalization of data to results of a previous year's run) for the total release source will be done annually in conjunction with the annual environmental report. This analysis will provide estimates of dose to the total body and various organs in addition to the dose limiting organs.

2.4 FUNCTIONALITY OF LIQUID RADWASTE EQUIPMENT

All installed liquid radwaste systems have been removed from service for dismantlement.

2.5 OFF-SITE RELEASE RATE

10CFR50.36a requires that the release of radioactive materials be kept as low as is reasonably achievable. Appendix I to 10CFR50 provides the numerical guidelines on limiting conditions for operations to meet the as low as is reasonably achievable requirement.

Table 2-9 specifies a Design Basis Annual Quantity for the limiting radionuclide currently present on-site (Cs-137) equal to $6.62E-03$ Ci/y, or release rate of 18.4 uCi/day. The other two radionuclides currently detected in plant demolition debris are Co-60 and Eu-152. Both of these radionuclides have Design Basis Annual Quantities approximately order of magnitude higher Cs-137.

Annual analyses are run for the report specified in Part 1.5 of ODCM, Section III. LADTAP is used to calculate estimates of dose to the total body and limiting organs.

Radionuclides of highest dose consequence will remain predominately Cs-137 and Co-60 throughout the decommissioning interval. Iodine-131 and Cs-134, which have been important dose contributors during power operations, no longer are present in effluents in detectable concentrations due to decay.

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TABLE 2-7
BIOACCUMULATION FACTORS
($\mu\text{Ci/g}$ per $\mu\text{Ci/ml}$)

<u>Element</u>	<u>Freshwater Fish</u>
H	9.0E-01
C	4.6E+03
Na	1.0E+02
P	1.0E+03
Cr	2.0E+02
Mn	4.0E+02
Fe	1.0E+02
Co	5.0E+01
Ni	1.0E+02
Cu	5.0E+01
Zn	2.0E+03
Br	4.2E+02
Rb	2.0E+03
Sr	3.0E+01
Y	2.5E+01
Zr	3.3E+00
Nb	3.0E+04
Mo	1.0E+01
Tc	1.5E+01
Ru	1.0E+01
Rh	1.0E+01
Te	4.0E+02
I	1.5E+01
Cs	2.0E+03
Ba	4.0E+00
La	2.5E+01
Ce	1.0E+00
Pr	2.5E+01
Nd	2.5E+01
W	1.2E+03
Np	1.0E+01

TABLE 2-8
BIG ROCK POINT DESIGN OBJECTIVE ANNUAL QUANTITIES FOR LIQUID
 EFFLUENTS AS DETERMINED BY LADTAP

Design objective annual quantities for liquid effluents were calculated utilizing the computer code LADTAP, a program for calculating radiation exposure to man from routine releases of nuclear reactor liquid effluents (Reference NUREG/CR-1276).

Input parameters used are as follows:

<u>Pathway</u>	<u>Age Group</u>	<u>Usage</u>	<u>Dilution</u>	<u>Process Times (Hr)</u>
Fish	Adult	21.0 kg/yr	15.0	24.0
	Teen	16.0	15.0	24.0
	Child	6.9	15.0	24.0
	Infant	0.0	15.0	24.0
Drinking	Adult	730.0 L/yr	800.0	4.6
	Teen	510.0	800.0	4.6
	Child	510.0	800.0	4.6
	Infant	330.0	800.0	4.6
Shoreline	Adult	12.0 hr/yr	2.0	0.0
	Teen	67.0	2.0	0.0
	Child	14.0	2.0	0.0
	Infant	0.0	2.0	0.0
Swimming	Adult	12.0 hr/yr	2.0	0.0
	Teen	67.0	2.0	0.0
	Child	14.0	2.0	0.0
	Infant	0.0	2.0	0.0
Boating	Adult	100.0 hr/yr	15.0	0.0
	Teen	100.0	15.0	0.0
	Child	50.0	15.0	0.0
	Infant	0.0	15.0	0.0

The usage figures are obtained from Regulatory Guide 1.109 and are default values. Dilutions and the process time for drinking water were taken from the NUS study dated June 4, 1976. Including the process times shown in this table, total transit time for sport fish is 168 hours, commercial fish is 240 hours, and drinking water is 28.6 hours.

TABLE 2-8
BIG ROCK POINT DESIGN OBJECTIVE ANNUAL QUANTITIES FOR LIQUID
EFFLUENTS AS DETERMINED BY LADTAP

The following input parameters are used when running LADTAP for BRP:

1. 50-mile population - 1.94E05
2. Shore width factor - 0.3
3. Total discharge (ft./sec) – Actual value
4. Transit time for all pathways – See note for Table 2-2.
5. Sport fish harvest (kg/yr) - 3.29E05
6. Commercial fish harvest (kg/yr) - 1.70E05
7. Invertebrate and algae consumption - 0
8. Drinking water population - 7.07E03
9. Shoreline population usage (man-hours) - 3.8E07
10. Swimming population usage (man-hours) - 1.2E07
11. Boating population usage (man-hours) - 3.7E07
12. Dilution factor to drinking water intake - 800

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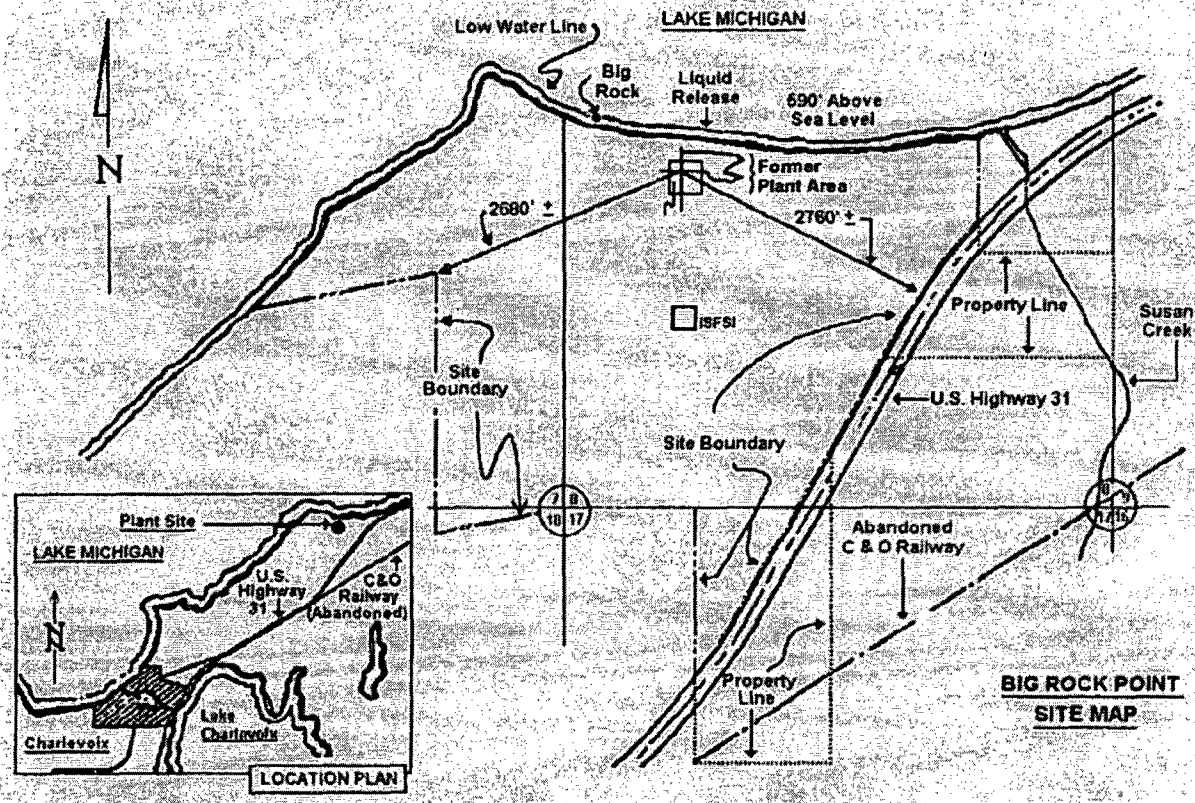
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TABLE 2-9
BIG ROCK POINT DESIGN OBJECTIVE ANNUAL QUANTITIES FOR LIQUID
 EFFLUENTS AS DETERMINED BY LADTAP*

<u>Nuclide</u>	<u>Dose Conversion Factors (mrem/Ci)</u>	<u>Individual/Organ</u>	<u>Design Objective Annual Quantity (Curies)</u>
H-3	5.11E-04	Adult/TB	5.87E+03
Sc-46	2.71E+00	Teen/TB	1.11E+00
Mn-54	1.83E+01	Adult/GI(LLI)	5.47E-01
Fe-55	1.20E-00	Child/Bone	8.36E00
Co-57	6.12E-01	Teen/TB	4.91E00
Co-58	1.52E+00	Teen/TB	1.97E00
Co-60	6.33E+01	Teen/TB	4.74E-02
Zn-65	4.67E+01	Child/TB	6.43E-02
Sr-89	4.21E+01	Child/Bone	2.37E-01
Sr-90	7.29E+02	Adult/Bone	1.38E-02
Zr-95	8.34E-01	Teen/TB	3.60E+00
Ag-110m	1.04E+01	Teen/TB	2.90E-01
Cd-113m	1.61E+01	Adult/GI(LLI)	6.23E-01
Sb-124	2.04E+00	Teen/TB	1.48E+00
Sb-125	6.84E+00	Teen/TB	3.39E-01
Te-127m	3.73E+01	Teen/Kidney	2.68E+01
Cs-134	7.63E+02	Adult/TB	3.93E-03
Cs-137	4.54E+02	Adult/TB	6.62E-03
Ce-144	8.91E-01	Adult/GI(LLI)	1.12E+01
Eu-152	4.33E+01	Teen/TB	6.91E-02

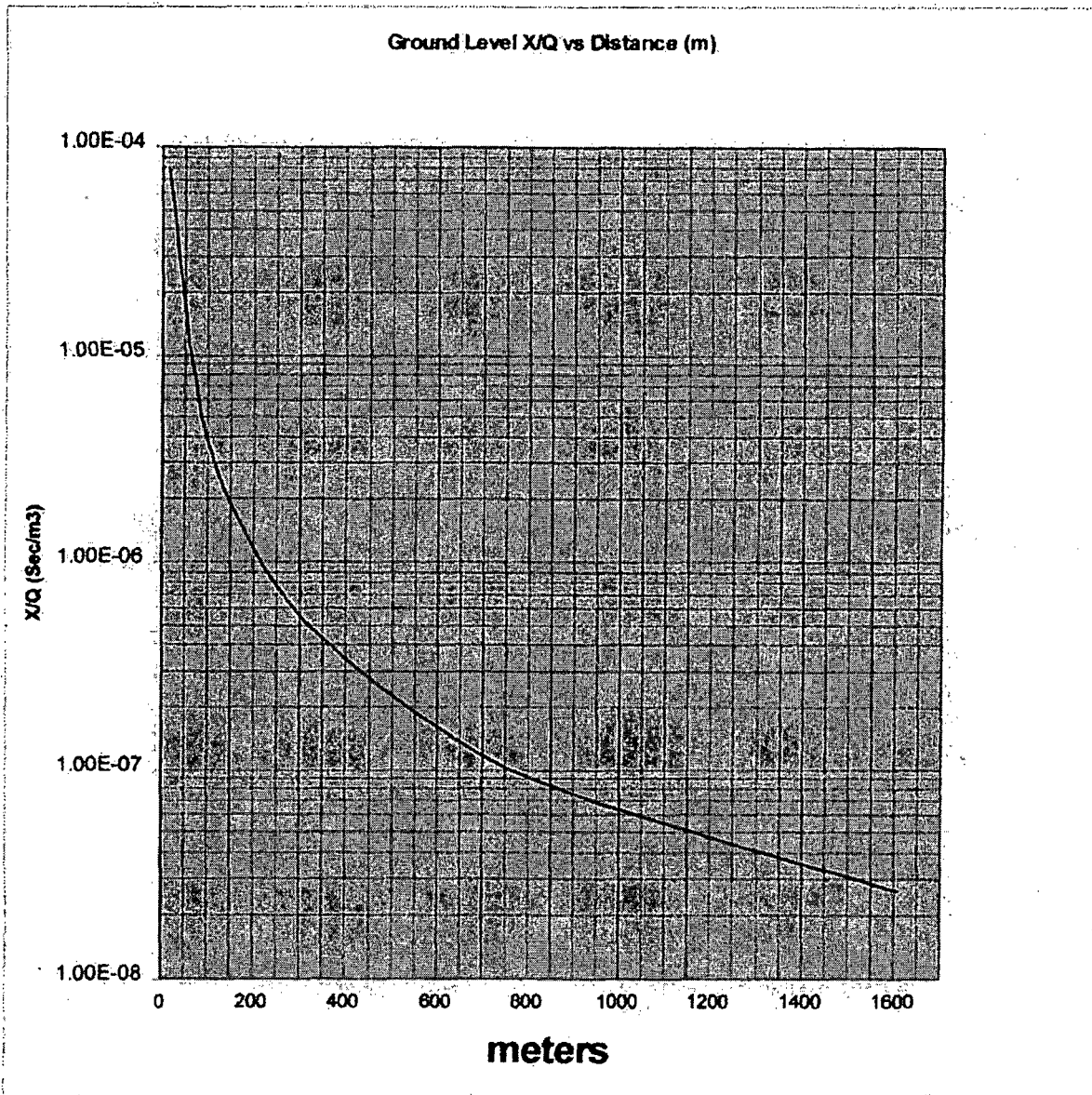
* Based on a current average discharge flow rate of 224 gpm.

FIGURE 2-1



* Gaseous release point is at ground level (590' above sea level) now that the stack has been removed for dismantlement.

FIGURE 2-2
GROUND LEVEL X/Qs FOR GROUND LEVEL RELEASE CALCULATIONS



3.0 CALCULATION OF URANIUM FUEL CYCLE DOSE

3.1 APPLICABILITY

Uranium Fuel Cycle dose is calculated when effluent doses exceed twice the levels specified in either ODCM, Section I, Requirement 1.3.2 or 3.2.2.

3.2 ASSUMPTIONS

3.2.1 The full time resident determined to be the maximally exposed individual (excluding infant) is assumed also to be a fisherman. This individual is assumed to drink water and ingest local fish at the rates indicated by the input parameters are summarized in Table 2-8.

3.2.2 Amount of shoreline fishing at accessible shoreline adjacent to the site is conservatively assumed as 48 hours per quarter (average of approximately 1/2 hour per day each day of the quarter) for the second and third quarters of the year, 36 hours for the fourth quarter and 18 hours for the first quarter.

3.2.3 The dose contribution due to uranium fuel cycle sources other than the plant (but including ISFSI) is ignored in the calculation. This is based on the lack of any operations that fall in the "cycles" definition within a five-mile radius of BRP.

3.3 DOSE CALCULATION

Maximum doses to the total body and internal organs of an individual shall be determined by use of LADTAP and GASPAP computer codes or optionally, by conservatively multiplying the mrem/Ci factors of Tables 2-6 and 2-9 by quantity released. Doses to like organs and total body shall be summed (organs are conservatively summed with total body when Tables 2-6 and 2-9 are utilized). Added to this sum will be a mean dose rate, calculated or measured for the shoreline due to the plant (ISFSI) during the quarter in question, times the assumed fishing time:

NOTE: For this calculation, the total body is conservatively assumed to be an additional organ.

$$D_{40i} = D_G + D_L + (R_T)(T) \quad (3.1)$$

Where:

- D_{40i} = 40CFR190 dose to organ (i) (mrem).
- D_G = Cumulative dose to an individual organ from gaseous releases (mrem).
- D_L = Cumulative dose to an individual organ from liquid releases (mrem).
- R_T = Mean dose rate (direct radiation component) calculated to be applicable to Lake Michigan shoreline adjacent to plant site (mrem/hr).
- T = Assumed shoreline fishing time for the quarter in question (hours) (see 3.2.2 above).

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ODCM SECTION III

REPORTING AND MAJOR MODIFICATION REQUIREMENTS

1.0 RADIOLOGICAL EFFLUENT RELEASE REPORT

The Radioactive Effluent Release Report shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and Process Control Program, and (2) in conformance with 10CFR50.36a and Section IV.B.1 of Appendix I to 10CFR50.

1.1 ESTIMATE OF UNCERTAINTY

The report shall include an estimate of the uncertainty associated with the measurement of radioactive effluents. This error term is included to provide an estimate of the uncertainty and is not to be considered the absolute error associated with the measurements or to be used in determining compliance with these requirements.

Estimates for liquid releases will be based on a statistical analysis of a series of sample results (weighed appropriately for counting statistics) taken once a year from a minimum of one typical liquid radwaste tank or other liquid effluent source. The error term for particulates released to the atmosphere will be based on the counting statistics for one air particulate sample taken during the year.

The report shall include an estimate of the lower level of detection (in uCi/ml) if the unidentified portion of the release exceeds ten percent of the total annual releases. This estimate of the lower level of detection will be made for gamma emitting isotopes listed in Appendix B of Regulatory Guide 1.21 (June 1974) and will be provided based on a typical background spectrum.

1.2 SUPPLEMENTAL INFORMATION

a. Batch Releases

Although both liquid and gaseous releases occur with variable rates and have variable durations, they shall be treated as continuous releases, rather than batches.

b. Abnormal Releases

The number of abnormal releases and number of curies of radioactive material released to the environment during abnormal releases should be reported.

1.3 GASEOUS EFFLUENTS

a. Gases (all plant contributions are zero).

b. Iodines (all plant contributions are zero).

c. Particulates

- 1) Total curies of radioactive material in particulate form with half-lives greater than eight days determined to have been released.
- 2) Average release rate (uCi/s) of radioactive material in particulate form with half-lives greater than eight days.
- 3) Percent of limit for radioactive material in particulate form with half-lives greater than eight days.
- 4) Total curies for each of the radionuclides in particulate form determined to be released based on analyses performed.
- 5) Total curies of gross alpha radioactivity of plant origin determined to be released.

d. Tritium

- 1) Total curies of tritium estimated to be released in gaseous effluent.
- 2) Average release rate (uCi/s) of tritium.
- 3) Percentage of applicable limits for tritium.

1.4 LIQUID EFFLUENTS

- a. Mixed Fission and Activation Products
 - 1) Total curies of radioactive material determined to be released in liquid effluents (not including tritium, dissolved and/or entrained gases, and alpha-emitting material).
 - 2) Average concentrations ($\mu\text{Ci/ml}$) of mixed fission and activation products released to unrestricted areas, averaged over the quarterly periods covered by the report.
 - 3) Percent of applicable limit of average concentrations released to unrestricted areas.
 - 4) Quarterly sums of total curies for each of the radionuclides determined to be released in liquid effluents based on analyses performed.
- b. Tritium
 - 1) Total curies of tritium determined to be released in liquid effluents.
 - 2) Average concentrations ($\mu\text{Ci/ml}$) of tritium released to unrestricted areas, averaged over the quarterly periods covered by the report.
 - 3) Percent of applicable limit of average concentrations released to unrestricted areas.
- c. Dissolved and/or Entrained Gases (all plant contributions are zero)
- d. Alpha Radioactivity

Total curies of gross alpha-emitting materials of plant origin determined to be released in liquid effluents.

e. Volumes

- 1) Total measured volume (liters), prior to dilution, of liquid effluent released.
- 2) Total determined volume, in liters, of dilution water used during the period of the report.

1.5 SOLID WASTE

The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10CFR61) shipped off-site during the report period:

- a. Container burial volume,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Source of waste and processing employed (i.e., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Type of container (i.e., LSA, Type A, Type B, Large Quantity); and
- f. Solidification agent or absorbent (i.e., cement, asphalt).

1.6 RADIOLOGICAL IMPACT ON MAN

The Radioactive Effluent Release Report shall include potential doses to individuals and populations calculated using measured effluent and averaged meteorological data in accordance with the methodologies of ODCM, Section II.

- a. Total body and significant organ doses (greater than 1 millirem) to individuals in restricted areas from receiving water-related exposure pathways.
- b. Maximum off-site air doses greater than one millirad due to beta and gamma radiation at locations near ground level from gaseous effluents.

- c. Organ doses greater than one millirem to individuals in unrestricted areas from radioactive iodine and radioactive material in particulate form from the major pathways of exposure.
- d. Total body doses greater than one manrem to the population and average doses greater than one millirem to individuals in the population from receiving water-related pathways to a distance of 50 miles from the site.
- e. Total body doses greater than one manrem to the population and average doses greater than one millirem to individuals in the population from gaseous effluents to a distance of 50 miles from the site.

1.7 ODCM CHANGES

The Radiological Effluent Release Report shall include any changes made during the reporting period to the Off-site Dose Calculation Manual (ODCM), including identification of new locations for dose calculations and/or environmental sampling (ODCM, Section II, Table 2-4 and ODCM, Section I, Table 1-1, respectively).

2.0 RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

The Radiological Environmental Operating Report covering the operation of the unit during the pervious calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations and analysis of trends of results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the ODCM and Sections IV.B.2, IV.B.3 and IV.C of Appendix I to 10CFR50.

The Radiological Environmental Operating Report shall include summaries, interpretation and statistical evaluation of the results of the radiological environmental surveillance activities for the report period, including a comparison with previous environmental surveillance report data of similar type and an assessment of the observed impacts of the Plant operation on the environment.

The Annual Radiological Environmental Operating Report shall include summarized and tabulated results of all radiological environmental samples taken during the report period. In the event that some 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 report also shall provide a summary description of the environmental monitoring program and a map depicting sample locations.

3.0 NON-ROUTINE REPORTS

A report shall be submitted to the NRC in the event that:

- a. The Radiological Environmental Monitoring Program is not substantially conducted as described in ODCM, Section I, Part 4.0.
- b. Dose to an off-site individual is estimated to have exceeded the requirements of 40CFR190, per ODCM, Section I, Part 3.0.
- c. An unusual or important event occurs due to plant operations that causes a significant radiological environmental impact or affects a potential environmental impact.
- d. Non-routine reports shall be submitted within 30 days of determining that an event has occurred to require such report.

4.0 MAJOR MODIFICATION OF RADIOACTIVE WASTE SYSTEMS

4.1 APPLICABILITY

All installed radioactive waste systems have been dismantled. Dismantlement was performed after determining that removal would not cause effluents to exceed Specifications 1.3 or 2.3 of ODCM, Section I, or cause effluents to exceed two percent of the annual limit on a monthly basis.

4.1.1 Major modifications of the radwaste system, as defined in Requirement 4.2.2 below, shall be reported to the NRC pursuant to 10CFR50.59. The discussion of each modification shall contain:

- a. A summary of the evaluation that led to the determination that the modification could be made in accordance with 10CFR50.59.
- b. A description of the equipment, components and processes involved, and the interfaces with other Plant systems.
- c. Documentation of the fact that the modification was reviewed and found acceptable by the NRC.

4.1.2 Shall become effective upon review and acceptance by the Site General Manager.

4.2 DEFINITION OF MAJOR RADWASTE SYSTEM MODIFICATION OR EQUIVALENT ODCM REVISION

4.2.1 Purpose

The purpose of this definition is to assure that modifications (including removal) of radwaste systems during decommissioning or revisions to ODCM do not increase the potential for dose due to effluents to exceed the quarterly or semiannual limits of Specifications 1.3 or 2.3, ODCM, Section I or cause effluent dose to exceed two percent of the annual limit on a monthly basis.

4.2.2 Definition

A major radwaste system modification is a modification which would cause reduction in effluent treatment, monitoring or control that would result in inability to meet the quarterly or semiannual off-site dose limits of Specifications 1.3 (airborne release) or 2.3 (liquid release), of ODCM, Section I. In addition, a major modification would be determined by inability of new equipment or techniques to maintain effluents below two percent of the annual limits in a month, provided that the original equipment would have been capable of meeting that goal.

Improvements or additions to reduce radioactivity in effluents shall not be considered major modifications, nor will any dismantlement activities that do not cause effluents to exceed two percent of the Appendix I limits in any 31-day interval.