

Serial: RNP-RA/12-0040

APR 2 6 2012

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

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

2011 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Ladies and Gentlemen:

Attached is the Annual Radioactive Effluent Release Report for the period of January 1, 2011, through December 31, 2011, for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. This report is submitted in accordance with 10 CFR 50.4 as required by 10 CFR 50.36a(a)(2) and the HBRSEP, Unit No. 2, Technical Specifications Section 5.6.3.

This document contains no new Regulatory Commitments. If you have any questions on this subject, please contact me at (843) 857-1329.

Sincerely,

W. Richard Highton

Supervisor – Licensing/Regulatory Programs

WRH/rjr

Attachment

c: V. M. McCree, NRC, Region II
Ms. Araceli Billoch Colòn, NRC, NRC (w/o Attachments)
NRC Resident Inspector

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

I EH8

EFFLUENT AND WASTE DISPOSAL

ANNUAL REPORT

January 1, 2011 - December 31, 2011

PROGRESS ENERGY CAROLINAS

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

RENEWED OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

TABLE OF CONTENTS

	Desc	<u>Cription</u>	<u>Page</u>
I.	EXE	CUTIVE SUMMARY	4
	A.	Discussion	4
	B.	Significant Variances	8
	C.	Regulatory Compliance	8
II.	SUP	PLEMENTAL INFORMATION	9
	A.	Regulatory Limits	
	В.	Measurements and Approximations of Total Radioactivity	10
	C.	Estimated Total Errors	11
III.	GAS	SEOUS EFFLUENTS	12
	A.	Batch Releases	12
	B.	Abnormal Releases	12
	C.	Data Tables	12
IV.	LIQ	UID EFFLUENTS	18
	A.	Batch Releases	18
	B.	Abnormal Releases	18
	C.	Data Tables	18
V.	SOL	ID WASTE AND IRRADIATED FUEL SHIPMENTS	24
	A.	Waste Class A	24
	В.	Waste Class B	27
	C.	Waste Class C	29
VI.	40 C	CFR 190 DOSE CONFORMANCE	32
VII.	MET	TEOROLOGICAL DATA	32
	A.	Continuous Release Diffusion Analysis	32

LIST OF TABLES

<u>Table</u>	<u>Description</u>	<u>Page</u>
Table III-A	Gaseous Effluents - Summation of All Releases	13
Table III-B	Gaseous Effluents - Ground Level and Mixed Mode Releases	15
Table III-C	Typical Lower Limits of Detection for Gaseous Effluents	17
Table IV-A	Liquid Effluents - Summation of All Releases	19
Table IV-B	Liquid Effluents - Continuous Mode and Batch Mode Releases	21
Table IV-C	Typical Lower Limits of Detection for Liquid Effluents	23
Table VII-A	Joint Occurrence Frequencies for LOWNDDEG and LOWNDSPD -	-
	Ground Continuous Releases	33

Page 4 of 39

I. EXECUTIVE SUMMARY

A. Discussion

1. Effluent Controls

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Offsite Dose Calculation Manual specifies controls and dose limits pertaining to releases of radioactivity to the environment. None of these controls or dose limits were exceeded during 2011.

2. Protection Standards

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

3. Sources of Radioactivity Released

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

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

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

4. Noble Gas

Some of the fission products released in airborne effluents are radioactive isotopes of noble gases, such as argon and xenon. Noble gases are by nature inert and do not concentrate in humans or other organisms. Noble gases contribute to human radiation exposure as external exposure.

United States Nuclear Regulatory Commission

Attachment to Serial: RNP-RA/12-0040

Page 5 of 39

5. Iodines and Particulates

The main contribution of radioactive iodine to human exposure is to the thyroid gland, where the body concentrates iodine. The particulates contribute to internal exposure of tissues such as the muscle, liver, and intestines. These particulates can also be a source of exposure if deposited on the ground.

March and April 2011, RNP's Radiological Environmental Monitoring Program identified detectable concentration of I-131 from samples obtained from iodine cartridges at the control station #1in Florence, SC and similar locations through the region. The plant's gaseous effluent indicated similar activities of I-131. As such, the atypical detection of I-131 in the gaseous effluent is credibly attributed to the trans-Pacific transport of airbone releases from Dai-Ichi, Fukushima following the March 11, 2011 Tohoku earthquake and is not related to plant operations and was not accounted for in this report. (NCR-00464849)

6. Tritium

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

7. Processing and Monitoring

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

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

Page 6 of 39

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

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

8. Exposure Pathways

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

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

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

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

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

Page 7 of 39

9. Plant Operation

With the exception of September 26, 2011 thru September 29, 2011 HBRSEP, Unit No. 2, operated continuously.

10. Results

The Radioactive Effluent Release Report is a detailed listing of the radioactivity released from the HBRSEP, Unit No. 2, during the period from January 1, 2011 through December 31, 2011. Some of the gaseous and liquid release parameters for this reporting period are summarized below:

GASEOUS EFFLUENTS	<u>Units</u>	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
Fission & Act. Gas	Ci	5.48E-02	7.06E-02	6.92E-02	1.05E-01
I-131	Ci	ND ¹	ND	1.58E-07	9.97E-07
Part. >8 Day Half-Lives	Ci	ND	8.36E-08	ND	ND
Tritium	Ci	1.36E+00	2.31E+00	1.76E+00	9.80E-01
LIQUID EFFLUENTS	<u>Units</u>	1st Qtr	2nd Otr	3rd Qtr	4th Qtr
Fission & Act. Products Tritium Dilution Volume Waste Volume	Ci	3.67E-04	1.47E-03	8.91E-04	1.99E-04
	Ci	6.14E+00	1.59E+01	6.77E+01	3.34E+02
	Liters	2.80E+11	2.73E+11	2.89E+11	2.87E+11
	Liters	9.66E+04	2.10E+05	3.51E+05	9.03E+05

During the period of January 1, 2011 through December 31, 2011, the estimated maximum individual offsite dose due to radioactivity released in effluents was:

Liquid Effluents:

•	Total Body Dose	0.0000385 millirem
•	Critical Organ Dose	0.0000392 millirem, Liver

Note – an additional 0.163 mrem to a child was estimated based on the evaporation of tritium from Lake Robinson. This is based on Lake Robinson 2011 environmental sample results, 2011 meteorology and represents the dose from the buildup in the lake. This conservatively bounds the dose due to 2011 tritium effluents.

¹ ND, No Detectable Activity

Page 8 of 39

Gaseous Effluents:

Beta Air Dose 0.00150 millirad
 Gamma Air Dose 0.00303 millirad
 Critical Organ Dose 0.08830 millirem, Thyroid

Note - Carbon-14 releases resulted in 0.122 mrem to the total body and 0.610 mrem to the bone of a child, which is not included in the above doses. It is estimated that 8.95 curies of Carbon-14 were released during 2011.

B. Significant Variances

1. No variances in historical data of significance were identified during this period.

C. Regulatory Compliance

- 1. The 10 CFR 50, Appendix I, doses were calculated using the Canberra Effluent Management System (EMS¹). The EMS Software provides day-by-day dose estimates that are conservative because all releases are assigned to the limiting receptor, using the continuous ground level dispersion factors calculated from 1978 meteorology. When projected on a day-by-day basis, utilizing conservative meteorological conditions, the dose commitment from gaseous and liquid effluents is a small fraction of the 10 CFR 50, Appendix I, limits. The direct radiation assessment to the most likely exposed member of the public is reported in the Annual Radiological Environmental Operating Report. During 2011, the results of the direct radiation assessment demonstrated no measurable effect above background for plant operations.
- 2. There were no changes to the waste solidification Process Control Program (PCP) during this reporting period. See page 36.
- 3. There were no changes to the Radioactive Waste Systems (i.e., liquid, gaseous, or solid) during this reporting period. See page 36.
- 4. There were no reportable instrumentation inoperability events during this reporting period. See page 37.
- 5. There were no outside liquid holdup tanks that exceeded the 10 curie limit during this reporting period. See page 37.
- 6. There were no Waste Gas Decay Tanks that exceeded the 1.9E+04 curie limit during this reporting period. See page 37.
- 7. There were no instances of missed compensatory samples during this reporting period. See page 37.
- 8. There was one revision to the ODCM during this reporting period. See page 36.

¹ EMS, Effluent Management System Software is a product of Canberra Nuclear Industries used for determining dose from radioactive effluent releases.

Page 9 of 39

- 9. There were no dose calculations performed or special reports made as a result of any spills or leaks during this period. See page 37.
- 10. There were no events associated with a failure to meet an ODCM specified sampling frequency. See page 37.

II. SUPPLEMENTAL INFORMATION

A. Regulatory Limits

1. Fission and Activation Gases:

10 CFR 20 Limits (Instantaneous Release Rate)

Total Body Dose ≤500 mrem/yr

Skin Dose ≤3000 mrem/yr

10 CFR 50, Appendix I

For Calendar Quarter

Gamma Dose ≤5 mrad

Beta Dose ≤10 mrad

For Calendar Year

Gamma Dose ≤10 mrad

Beta Dose <20 mrad

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

10 CFR 20 Limits (Instantaneous Release Rate)

Dose from Inhalation (only) to a child to any organ ≤1500 mrem/yr

10 CFR 50, Appendix I (Organ Doses)

For Calendar Quarter ≤7.5 mrem For Calendar Year ≤15 mrem

3. Liquids:

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

10 CFR 50, Appendix I
For Calendar Quarter
Total Body Dose ≤1.5 mrem
Any Organ Dose ≤5 mrem
For Calendar Year
Total Body Dose ≤3 mrem
Any Organ Dose ≤10 mrem

Page 10 of 39

B. Measurements and Approximations of Total Radioactivity

1. Continuous Gaseous Releases

- a) Fission and Activation Gases The total activity released is determined from the net count rate of the gaseous monitor, its calibration factor, and the total exhaust flow. The activity of radioactive gas is determined by the fraction of that radioactive gas in the isotopic analysis for that period.
- b) Iodines The activity released as Iodine-131, 133, and 135 is based on isotopic analysis of the charcoal cartridge and particulate filter, and the total exhaust flow.
- c) Particulates The activity released via particulates with half-lives greater than eight days is determined by isotopic analysis of particulate filters and the total exhaust flow.
- d) Tritium The activity released as tritium is based on weekly grab sample analysis and total exhaust flow.
- e) Carbon 14 The activity released is determine by using NUREG-0017 (GALE Code) Section 2.2.25 and corrected for Effective Full Power Days (EFPD) for 2011.

2. Batch Gaseous Releases

- a) Fission and Activation Gases The activity released is based on the volume released and the activity of the individual nuclides obtained from an isotopic analysis of the grab sample taken prior to the release.
- b) Iodines The iodines from mixed mode batch releases are included in the iodine determination from the mixed mode continuous Reactor Auxiliary Building release.
- c) Particulates The particulates from mixed mode batch releases are included in the particulate determination from the mixed mode continuous Reactor Auxiliary Building release.
- d) Tritium The activity released as tritium is based on the grab sample analysis of each batch and the batch volume.
- e) Carbon 14 The activity released is determine by using NUREG-0017 (GALE Code) Section 2.2.25 and corrected for Effective Full Power Days (EFPD) for 2011.

Page 11 of 39

3. Liquid Releases

- a) Fission and Activation Products The total release values (not including tritium, gases, and alpha) are comprised of the sum of the individual radionuclide activities in each release to the discharge canal for the respective quarter. These values represent the activity known to be present in the liquid radwaste effluent.
- b) Tritium The activity released as tritium is based on the grab sample analysis of each batch and the batch volume. For continuous releases, the activity released as tritium is based on analysis of a weekly composite sample. For continuous releases without a composite sampler, the tritium activity is based on analysis of daily grab samples or a composite of grab samples.
- c) Alpha The measured alpha concentration in a monthly composite sample is used to calculate the total release and average diluted concentration during each period.
- d) Strontium-89, 90, and Iron-55 The total release values are measured quarterly from composite samples.

C. Estimated Total Errors

- 1. Estimated total errors for gaseous effluents are based on uncertainties in counting equipment calibration, counting statistics, exhaust flow rates, exhaust sample flow rates, non-steady release rates, chemical yield factors, and sample losses for such items as charcoal cartridges.
- 2. Estimated total errors for liquid effluents are based on uncertainties in counting equipment calibration, counting statistics, non-steady release flow rate, sampling and mixing losses, and volume determinations.
- 3. Estimated total errors for solid waste are based on uncertainties in equipment calibration, dose rate measurements, geometry, and volume determinations.

Page 12 of 39

III. GASEOUS EFFLUENTS

A. Batch Releases

	Jan - June 2011	July - Dec 2011
Number of batch releases	58	66
Total time period for batch releases	2.97E+04 min	1.96E+04 min
Maximum time period for a batch release	9.68E+03 min	6.90E+02 min
Average time period for a batch release	5.12E+02 min	2.97E+02 min
Minimum time period for a batch release	3.00E+01 min	6.00E+00 min

B. Abnormal Releases

	Jan - June 2011	July – Dec 2011
Number of releases	0	0
Total activity released	0.00E+00 Ci	0.00E+00 Ci

C. Data Tables

The following tables provide the details of gaseous releases:

Table III-A Summation of All Releases

Table III-B Ground Level and Mixed Mode Releases

Table III-C Typical Lower Limits of Detection for Gaseous Effluents

Page 13 of 39

TABLE III-A EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 GASEOUS EFFLUENTS - SUMMATION OF ALL RELEASES

		Unit	Quarter 1	Quarter 2	Est. Total Error %
A.	Fission and Activation Gases				
·	1. Total release	Ci	5.48E-02	7.06E-02	3.24E+01
	2. Average release rate for period	μCi/sec	7.04E-03	8.99E-03	
B.	Iodines				
	1. Total Iodine-131	Ci	ND^3	ND ³	6.21E+01
	2. Average release rate for period	μCi/sec	ND ³	ND ³	
C.	Particulates				
	1. Particulates with half-lives >8 days	Ci	ND	8.36E-08	5.80E+01
	2. Average release rate for period	μCi/sec	ND	1.06E-08	
	3. Gross alpha radioactivity	Ci	ND	ND	
D.	Tritium				
	1. Total release	Ci	1.36E+00	2.31E+00	5.25E+01
	2. Average release rate for period	μCi/sec	1.74E-01	2.94E-01	
E.	Carbon-14				
	1. Total release ¹	Ci	2.24E+00	2.24E+00	
	2. Average release rate for period	μCi/sec	2.84E-01	2.84E-01	
F.	Percent of 10 CFR 50, Appendix I				
	Quarterly limit Gamma air Beta air Organ: Thyroid ²	% % %	1.54E-02 3.27E-03 2.49E-01	1.50E-02 3.62E-03 4.24E-01	
	 Cumulative Annual limit* Gamma air Beta air Organ: Thyroid² 	% % %	7.71E-03 1.64E-03 1.24E-01	1.52E-02 3.45E-03 3.36E-01	

^{*}Cumulative total for the year-to-date using the methodology in the ODCM.

The estimated releases of Carbon-14 are not based on measurements of effluents, but on the methodology of NUGEG-0017 adjusted for EFPD. The calculated annual release is divided equally among the four calendar quarters.

²The maximum organ dose (determined to be the thyroid from measured effluents) does not include Carbon-14 child bone dose of 0.153 mrem per quarter. Total Body dose from Carbon-14 releases is 0.0304 mrem per quarter.

³Iodines were detected in effluent sample during March and April while at the same time period the Environmental Samples reveal the similar concentrations due to Dai-Ichi, Fukushima and are not reported. (NCR-00464849)

Page 14 of 39

TABLE III-A (Continued) EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 GASEOUS EFFLUENTS - SUMMATION OF ALL RELEASES

		Unit	Quarter 3	Quarter 4	Est. Total Error %
A.	Fission and Activation Gases				
	1. Total release	Ci	6.92E-02	1.05E-01	3.24E+01
	2. Average release rate for period	μCi/sec	8.71E-03	1.32E-02	
B.	Iodines				
	1. Total Iodine-131	Ci	1.58E-07	9.97E-07	6.21E+01
	2. Average release rate for period	μCi/sec	1.99E-08	1.26E-07	
C.	Particulates				
	1. Particulates with half-lives >8 days	Ci	ND	ND	5.80E+01
	2. Average release rate for period	μCi/sec	ND	ND	,
	3. Gross alpha radioactivity	Ci	ND	ND	
D.	Tritium				
	1. Total release	Ci	1.76E+00	9.80E-01	5.25E+01
	2. Average release rate for period	μCi/sec	2.21E-01	1.23E-01	
E.	Carbon-14				
	1. Total release ¹	Ci	2.24E+00	2.24E+00	
	2. Average release rate for period	μCi/sec	2.84E-01	2.84E-01	
F.	Percent of 10 CFR 50, Appendix I				
	 Quarterly limit Gamma air Beta air Organ: Thyroid² 	% % %	1.36E-02 3.41E-03 3.22E-01	1.67E-02 4.70E-03 1.82E-01	
	 Cumulative Annual limit* Gamma air Beta air Organ: Thyroid² 	% % %	2.20E-02 5.15E-03 4.97E-01	3.03E-02 7.50E-02 5.88E-01	

^{*}Cumulative total for the year-to-date using the methodology in the ODCM.

¹The estimated releases of Carbon-14 are not based on measurements of effluents, but on the methodology of NUREG-0017 adjusted for EFPD. The calculated annual release is divided equally among the four calendar quarters

²The maximum organ dose (determined to be the thyroid from measured effluents) does not include Carbon-14 bone dose of 0.153 mrem per quarter. Total Body dose from Carbon-14 releases is 0.0304 mrem per quarter.

Page 15 of 39

TABLE III-B EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 GASEOUS EFFLUENTS - GROUND LEVEL AND MIXED MODE RELEASES

·		Continuo	ous Mode	Batch	Mode
Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 1	Quarter 2
1. Fission Gases					
Ar-41	Ci	ND	ND	3.15E-02	2.99E-02
Kr-85	Ci	ND	ND	ND	5.65E-04
Xe-133	Ci	ND	2.70E-02	2.33E-02	1.32E-02
Xe-135	Ci	ND	ND	1.95E-05	ND
Total for Period	Ci	ND	2.70E-02	5.48E-02	4.37E-02
2. Iodines ¹					
I-131	Ci	ND	ND	ND	ND
I-133	Ci	ND	ND	ND	ND
Total for Period	Ci	ND	ND	ND	ND
3. Particulates ¹					
Co-60	Ci	ND	ND	ND	8.36E-08
Total for Period	Ci	ND	ND	ND	8.36E-08
4. Carbon-14					
C-14	Ci	1.38E+00	1.38E+00	8.59E-01	8.59E-01
Total for Period	Ci	1.38E+00	1.38E+00	8.59E-01	8.59E-01

¹Mixed mode continuous accountability includes mixed mode batch accountability (excludes tritium).

Page 16 of 39

TABLE III-B (Continued) EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 GASEOUS EFFLUENTS - GROUND LEVEL AND MIXED MODE RELEASES

		Continuo	ous Mode	Batch	Mode
Nuclides Released	Unit	Quarter 3	Quarter 4	Quarter 3	Quarter 4
1. Fission Gases					
Ar-41	Ci	ND	ND	2.69E-02	3.22E-02
Kr-85	Ci	ND	ND	3.15E-04	4.10E-04
Kr-85m	Ci	ND	ND	ND	1.17E-05
Xe-131m	Ci	ND	ND	ND	6.42E-04
Xe-133	Ci	3.15E-02	1.63E-02	1.06E-02	5.38E-02
Xe-133m	Ci	ND	ND	ND	4.96E-04
Xe-135	Ci	ND	ND	2.01E-06	7.97E-04
Total for Period	Ci	3.15E-02	1.63E-02	3.78E-02	8.84E-02
2. Iodines ¹					
I-131	Ci	1.58E-07	9.97E-07	ND	ND
I-133	Ci	ND	2.75E-06	ND	ND
Total for Period	Ci	1.58E-07	3.75E-06	ND	ND
3. Particulates ¹					
Total for Period	Ci	ND	ND	ND	ND
4. Carbon-14					
C-14	Ci	1.38E+00	1.38E+00	8.59E-01	8.59E-01
Total for Period	Ci	1.38E+00	1.38E+00	8.59E-01	8.59E-01

¹Mixed mode continuous accountability includes mixed mode batch accountability (excludes tritium).

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

Nuclide	LLD (μCi/cc)
H-3	6.85E-09
Ar-41	2.54E-08
Mn-54	9.55E-15
Co-58	5.70E-14
Fe-59	6.00E-14
Co-60	1.41E-14
Zn-65	6.47E-14
Br-82	1.93E-13
Kr-85	2.60E-06
Kr-85m	1.75E-08
Kr-87	4.60E-08
Kr-88	4.52E-08
Sr-89	1.92E-15
Sr-90	8.25E-16
Mo-99	7.40E-13
I-131	5.30E-14
Xe-131m	7.03E-07
I-133	1.20E-12
Xe-133	4.45E-08
Xe-133m	1.29E-07
Cs-134	3.91E-14
I-135	2.21E-09
Xe-135	1.72E-08
Xe-135m	6.63E-08
Cs-137	2.42E-14
Xe-138	2.07E-07
Ba-140	1.67E-13
La-140	5.62E-14
Ce-141	6.23E-14
Ce-144	2.28E-13
Gross Alpha	3.44E-15

Page 18 of 39

IV. LIQUID EFFLUENTS

A. Batch Releases

	Jan - June 2011	July - Dec 2011
Number of batch releases	10	44
Total time period for batch releases	2.04E+03 min	9.56E+03 min
Maximum time period for a batch release	2.36E+02 min	3.07E+02 min
Average time period for a batch release	2.04E+02 min	2.17E+02 min
Minimum time period for a batch release	1.13E+02 min	7.00E+01 min
Average stream flow during release periods	3.75E+05 gpm	3.96E+05 gpm

B. Abnormal Releases

	Jan - June 2011	July - Dec 2011
Number of releases	0	0
Total activity released	0.00E+00 Ci	0.00E+00 Ci

C. Data Tables

The following tables provide the details of liquid releases:

Table IV-A Summation of All Releases

Table IV-B Continuous Mode and Batch Mode Releases

Table IV-C Typical Lower Limits of Detection for Liquid Effluents

Page 19 of 39

TABLE IV-A EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES

	•	Unit	Quarter 1	Quarter 2	Est. Total Error %
A.	Fission and Activation Products				
	Total release (not including tritium, gases, alpha)	Ci	3.67E-04	1.47E-03	2.23E+01
	Average diluted concentration during period	μCi/ml	1.31E-12	5.40E-12	
B.	Tritium				
	1. Total release	Ci	6.14E+00	1.59E+01	3.03E+01
i	Average diluted concentration during period	μCi/ml	2.19E-08	5.84E-08	
C.	Dissolved and entrained gases				
	1. Total release	Ci	2.57E-06	7.49E-06	4.72E+01
	2. Average diluted concentration during period	μCi/ml	9.18E-15	2.75E-14	
	3. Percent of applicable limit	%	4.59E-09	1.38E-08	
D.	Gross alpha radioactivity				
	1. Total release	Ci	ND	ND	1.83E+01
E.	Volume of waste released prior to dilution	Liters	9.66E+04	2.10E+05]
F.	Volume of dilution water used during period	Liters	2.80E+11	2.73E+11	
G.	Percent of 10 CFR 50, Appendix I				
	Quarterly Limit Organ: GI-LLI, Liver ¹ Total body	% %	3.22E-06 7.08E-06	4.63E-05 1.25E-04	
	2. Cumulative Annual Limit* Organ: Liver, GI-LLI Total body	% %	1.61E-06 3.53E-06	2.42E-05 6.58E-05	

¹ GI-LLI, gastrointestinal-lower large intestine received the highest dose for Quarter 1 & Liver for Quarter 2.
^{*}Cumulative total for the year-to-date using the methodology in the ODCM.

Page 20 of 39

TABLE IV-A (Continued) EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES

		Unit	Quarter 3	Quarter 4	Est. Total Error %
A.	Fission and Activation Products				
	Total release (not including tritium, gases, alpha)	Ci	8.91E-04	1.99E-04	2.23E+01
	Average diluted concentration during period	μCi/ml	3.08E-12	6.92.E-13	
В	Tritium	·			
	Total release	Ci	6.77E+01	3.34E+02	3.03E+01
	Average diluted concentration during period	μCi/ml	2.34E-07	1.16E-06	
<u>C.</u>	Dissolved and entrained gases		,		
	Total release	Ci	7.71E-04	5.21E-02	4.72E+01
	Average diluted concentration during period	μCi/ml	2.67E-12	1.81E-10	
	3. Percent of applicable limit	%	2.39E-07	4.23E-06	
D.	Gross alpha radioactivity				
	1. Total release	Ci	ND	5.55E-05	1.83E+01
E.	Volume of waste released prior to dilution	Liters	3.51E+05	9.03E+05	
F.	Volume of dilution water used during period	Liters	2.89E+11	2.87E+11	
G.	Percent of 10 CFR 50, Appendix I				
	 Quarterly Limit Organ: Liver, GI-LLI¹ Total body 	% %	1.13E-04 3.64E-04	6.23E-04 2.07E-03	
	2. Cumulative Annual Limit* Organ:, GI-LLI Total body	% %	8.06E-05 2.48E-04	3.92E-04 1.28E-03	

¹Liver received the highest dose for Quarter 3 & 4.

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

Page 21 of 39

Total for Period

<u>TABLE IV-B</u> <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011</u> <u>LIQUID EFFLUENTS - CONTINUOUS MODE AND BATCH MODE RELEASES</u>

		Continu	ous Mode	Batch	Mode
Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 1	Quarter 2
H-3	Ci	ND	ND	6.13E+00	1.59E+01
Fe-55	Ci	ND	ND	8.78E-05	7.13E-05
Mn-54	Ci	ND	ND	ND	1.58E-05
Co-57	Ci	ND	ND	1.02E-06	ND
Co-58	Ci	ND	ND	4.25E-05	5.74E-05
Co-60	Ci	ND	ND	1.79E-04	1.22E-03
Nb-95	Ci	ND	ND	ND	4.53E-06
Ag-110m	Ci	ND	ND	ND	5.39E-06
Sb-125	Ci	ND	ND	5.61E-05	6.00E-05
Cs-134	Ci	ND	ND	ND	9.68E-06
Cs-137	Ci	ND	ND	ND	2.51E-05
Total for Period	Ci	ND	ND	3.67E-04	1.47E-03
Xe-133	Ci	ND	ND	2.57E-06	7.49E-06
		1		1	1

ND

Ci

2.57E-06

7.49E-06

ND

Page 22 of 39

TABLE IV-B (Continued) EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2011 LIQUID EFFLUENTS - CONTINUOUS MODE AND BATCH MODE RELEASES

		Continue	ous Mode	Batch	Mode
Nuclides Released	Unit	Quarter 3	Quarter 4	Quarter 3	Quarter 4
H-3	Ci	ND	ND	6.77E+01	3.33E+02
Fe-55	Ci	ND	ND	3.47E-04	8.18E-05
Mn-54	Ci	ND	ND	1.50E-06	3.14E-07
Co-57	Ci	ND	ND	1.06E-06	ND
Co-58	Ci	ND	ND	1.69E-05	4.68E-07
Co-60	Ci	ND	ND	4.67E-04	5.47E-05
Sb-125	Ci	ND	ND	5.17E-05	5.97E-05
Te-132	Ci	ND	ND	1.15E-06	ND
Cs-137	Ci	ND	ND	4.34E-06	7.05E-07
Ce-141	Ci	ND	ND	ND	2.08E-07
Total for Period	Ci	ND	ND	8.91E-04	1.98E-04
Xe-127	Ci	ND	ND	ND	1.50E-07
Xe-131m	Ci	ND	ND	ND	3.90E-04
Xe-133	Ci	ND	ND	7.71E-04	5.13E-02
Xe-133m	Ci	ND	ND	ND	3.67E-04
Xe-135	Ci	ND	ND	ND	1.77E-05
Total for Period	Ci	ND	ND	7.71E-04	5.21E-02
Gross Alpha	Ci	ND	ND	ND	5.55E-05

Page 23 of 39

TABLE IV-C
TYPICAL LOWER LIMITS OF DETECTION FOR LIQUID EFFLUENTS

Nuclide	LLD (μCi/ml)
H-3	4.19E-06
Cr-51	1.25E-07
Mn-54	1.84E-08
Fe-55	8.64E-08
Co-57	2.29E-08
Co-58	2.84E-08
Fe-59	2.88E-08
Co-60	2.48E-08
Zn-65	3.24E-08
Sr-89	3.70E-08
Sr-90	1.36E-08
Nb-95	1.21E-08
Zr-95	2.16E-08
Mo-99	1.61E-07
Tc-99m	2.06E-08
Ag-110m	1.87E-08
Sn-113	2.46E-08
Sb-122	2.72E-08
Te-123m	2.02E-08
Sb-124	1.44E-08
Sb-125	5.20E-08
Xe-127	1.45E-08
I-131	1.67E-08
Xe-131m	1.05E-06
Te-132	1.77E-08
Xe-133	7.07E-08
Xe-133m	1.90E-07
Cs-134	2.04E-08
Xe-135	2.67E-08
Cs-137	1.26E-08
Ba-140	7.30E-08
La-140	2.30E-08
Ce-141	3.71E-08
Ce-144	1.49E-07
Gross Alpha	8.74E-08

Page 24 of 39

V. <u>SOLID WASTE AND IRRADIATED FUEL SHIPMENTS</u> Report Time Period: January 1, 2011, through December 31, 2011

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

Waste Class <u>A</u>

1.	Type of Waste	Waste Volume (m³)	Activity (Ci)	Estimated Error (%)	No. Ship.
a.	Spent resins, filter sludge, evaporator bottoms, etc.	6.81E+00	5.41E+00	2.00E+01	2
b.	Dry compressible waste, contaminated equipment, etc.	5.59E+01	1.04E-01	2.00E+01	1
c.	Irradiated components, control rods, etc.	N/A	N/A	N/A	N/A
d.	Other: Oil	2.28E+00	3.62E-06	2.00E+01	11

¹⁾ shipped with Dry Compressible Waste

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

Resins				
Radionuclide	%	Ci		
Ni-63	7.66E+01	4.14E+00		
Fe-55	6.49E+00	3.51E-01		
Co-60	6.39E+00	3.45E-01		
Cs-137	4.15E+00	2.24E-01		
Cs-134	2.96E+00	1.60E-01		
C-14	1.14E+00	6.14E-02		
Sb-125	7.00E-01	3.78E-02		
Sr-90	4.73E-01	2.56E-02		
Ni-59	4.64E-01	2.51E-02		
Mn-54	3.45E-01	1.87E-02		
Co-58	1.43E-01	7.73E-03		
H-3	7.92E-02	4.28E-03		
Others *	8.85E-02	4.79E-03		

Dry Compressible Waste				
Radionuclide	%	Ci		
Fe-55	5.29E+01	5.50E-02		
Co-60	1.33E+01	1.39E-02		
Ni-63	1.14E+01	1.18E-02		
Co-58	8.59E+00	8.93E-03		
Cr-51	2.41E+00	2.51E-03		
Cs-137	2.00E+00	2.08E-03		
Ce-144	1.94E+00	2.02E-03		
Nb-95	1.80E+00			
H-3	1.72E+00	1.79E-03		
Zr-95	1.52E+00	1.58E-03		
Fe-59	8.55E-01	8.89E-04		
Ag-110m	6.20E-01	6.45E-04		
Others **	9.60E-01	1.04E-01		
	Oil			
Radionuclide	%	Ci		
Cs-137	7.89E+01	2.86E-06		
Co-60	1.88E+01	6.82E-07		
Ce-144	2.25E+00	8.14E-08		

^{*} Others include Co-57, Pu-241, Ce-144, Tc-99, Cm-243, Cm-242, Pu-238, Am-241, & Pu-239.

Total Curie Quantity and Principle Radionuclides were determined by estimate.

^{**} Others include Sb-125, Mn-54, C-14, Sr-90, Co-57, Cs134, Sn-113, Zn-65, Cm-242, Cm-243, Pu-238, Am-241, Pu-239, & Sn-117m.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/11-0027 Page 26 of 39

3. Irradiated Fuel Shipments

Number of Shipments:0Mode of TransportationN/ADestinationN/A

4. Solid Waste

Number of Shipments: 3

Mode of Transportation Highway - Exclusive Use

Destination Barnwell Disposal Facility, Duratek

Services, Inc.(Bear Creek)

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/11-0027 Page 27 of 39

V. <u>SOLID WASTE AND IRRADIATED FUEL SHIPMENTS</u> Report Time Period: January 1, 2011, through December 31, 2011

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

Waste Class <u>B</u>

1.	Type of Waste	Waste Volume (m ³)	Activity (Ci)	Estimated Error (%)	No. Ship.
a.	Spent resins, filter sludge, evaporator bottoms, etc.	N/A	N/A	N/A	N/A
b.	Dry compressible waste, contaminated equipment, etc.	N/A	N/A	N/A	N/A
c.	Irradiated components, control rods, etc.	N/A	N/A	N/A	N/A
d.	Other: N/A	N/A	N/A	N/A	N/A

Page 28 of 39

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

_		%	Ci
	Re	esins	
	N/A	N/A	N/A

3. Irradiated fuel shipments

Number of Shipments:

0

Mode of Transportation

N/A

Destination

N/A

4. Solid Waste

Number of Shipments:

0

Mode of Transportation

Exclusive Use

Destination

Barnwell Disposal Facility

No Class B Shipments were made in 2011.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/11-0027 Page 29 of 39

V. <u>SOLID WASTE AND IRRADIATED FUEL SHIPMENTS</u> Report Time Period: January 1, 2011, through December 31, 2011

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

Waste Class C

1.	Type of Waste	Waste Volume (m ³)	Activity (Ci)	Estimated Error (%)	No. Ship.
a.	Spent resins, filter sludge, evaporator bottoms, etc.	1.02E+01	2.11E+02	2.00E+01	3
b.	Dry compressible waste, contaminated equipment, etc.	N/A	N/A	N/A	N/A
c.	Irradiated components, control rods, etc.	N/A	N/A	N/A	N/A
d.	Other	N/A	N/A	N/A	N/A

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/11-0027 Page 30 of 39

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

Resi	ns & Filters	
Radionuclide	%	Ci
Ni-63	5.71E+01	1.21E+02
Cs-137	1.32E+01	2.78E+01
Cs-134	1.04E+01	2.20E+01
Fe-55	9.01E+00	1.90E+01
Co-60	5.92E+00	1.25E+01
C-14	1.23E+00	2.60E+00
Sr-90	1.07E+00	2.27E+00
Mn-54	7.79E-01	1.65E+00
Sb-125	4.59E-01	9.70E-01
Co-58	4.36E-01	9.22E-01
H-3	1.64E-01	3.46E-01
Ce-144	6.44E-02	1.36E-01
Others*	1.58E-01	3.34E-01

^{*} Others include Co-57, Zr-95, Nb-95, Pu-241, Sn-113, Ni-59, Ag-110m, Zn-65, Tc-99, Cm-242, Pu-238, Cm-243, Fe-59, Cr-51, Pu-239, Am-241, Sr-89, Ru-103, Sn-117m

Total Curie Quantity and Principle Radionuclides were determined by estimate.

United States Nuclear Regulatory Commission Attachment to Serial: RNP-RA/11-0027 Page 31 of 39

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

3. Irradiated Fuel Shipments

Number of Shipments: 0
Mode of Transportation N/A
Destination N/A

4. Solid Waste

Number of Shipments: 0
Mode of Transportation N/A
Destination N/A

Page 32 of 39

VI. 40 CFR 190 DOSE CONFORMANCE

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

VII. METEOROLOGICAL DATA

A. Continuous Release Diffusion Analysis

Table VII-A presents the number and frequency of wind direction occurrences by wind speed class as recorded at the onsite meteorological system during continuous release, for the period January 1, 2011, through December 31, 2011.

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

Pertinent information available from the tables is as follows:

1. Stability

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

A	В	С	D	E	F	G
4.86	6.59	8.01	42.54	20.80	9.21	7.99

2.	Wind Speed	11 Meter
	Average Speed (mph)	4.89
	Percent Calm	3.79
	Percent Less than 3.5 mph	35.19 (excludes calm)
3.	Wind Direction	11 Meter
	Prevailing	S
	Percent Occurrence	10.4

Page 33 of 39

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

JOINT FREOUE	NCY DIS	TRIBUTI	ON OF W	IND SPE	ED AND	DIRECTI	ON	ΆT	MOSPHER	IC STAB	ILITY C	LASS A					
UMAX (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
0.36	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
1.56	0.000	0.011	0.000	0.000	0.011	0.011	0.011	0.011	0.011	0.000	0.000	0.011	0.000	0.011	0.000	0.000	0.092
3.35	0.023	0.034	0.103	0.126	0.103	0.183	0.206	0.115	0.160	0.298	0.562	0.481	0.218	0.046	0.046	0.011	2.717
5.59	0.011	0.000	0.000	0.000	0.000	0.023	0.011	0.023	0.252	0.436	0.378	0.252	0.126	0.138	0.160	0.023	1.834
8.27	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.034	0.046	0.034	0.034	0.011	0.034	0.011	0.000	0.206
10.95	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.011	0.000	0.000	0.000	0.000	0.000	0.000	0.011
15.65	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL	0.03	0.05	0.10	0.13	0.11	0.22	0.23	0.15	0.46	0.79	0.97	0.78	0.36	0.23	0.22	0.03	4.86%
Joint FREQUE	NCY DIS	TRIBUTI	ON OF W		ED AND				MOSPHER								
UMAX (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	MMM	MM	NNW	TOTAL
0.36	0.000	0.001	0.001	0.001	0.001	0.003	0.004	0.002	0.003	0.002	0.003	0.002	0.000	0.000	0.001	0.001	0.023
1.56	0.000	0.023	0.011	0.023	0.023	0.057	0.092	0.034	0.057	0.046	0.069	0.046	0.000	0.000	0.011	0.011	0.504
3.35	0.195	0.195	0.287	0.252	0.298	0.287	0.275	0.287	0.229	0.447	0.539	0.413	0.298	0.092	0.057	0.011	4.161
5.59	0.126	0.034	0.011	0.000	0.000	0.000	0.011	0.011	0.183	0.287	0.287	0.183	0.103	0.160	0.126	0.126	1.651
8.27	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.023	0.034	0.046	0.023	0.011	0.057	0.046	0.000	0.241
10.95	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.011	0.000	0.000	0.000	0.000	0.000	0.000	0.011
15.65	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL	0.32	0.25	0.31	0.28	0.32	0.35	0.38	0.33	0.50	0.83	0.94	0.67	0.41	0.31	0.24	0.15	6.59%
JOINT ERECITE	יאכע הדפ	יים ד פנוייו ל	ONOFW	IIND SPE	ED AND	חופקייד	ON	ΔТ	MOSPHER	TC STAR	TLITY C	TASS C					
JOINT FREQUE									MOSPHER				w	พพพ	NW	NNW	TOTAL.
UMAX (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	s	SSW	SW	WSW	W 0.000	WNW 0.000	NW 0.000	NNW 0.000	TOTAL
UMAX (M/S) 0.36	N 0.000	NNE 0.000	NE 0.000	ENE 0.000	E 0.000	ESE 0.000	SE 0.000	SSE 0.000	s 0.000	SSW 0.000	SW 0.000	WSW 0.000	0.000	0.000	0.000	0.000	0.000
UMAX (M/S) 0.36 1.56	N 0.000 0.034	NNE 0.000 0.057	NE 0.000 0.115	ENE 0.000 0.172	E 0.000 0.115	ESE 0.000 0.160	SE 0.000 0.057	SSE 0.000 0.034	S 0.000 0.069	SSW 0.000 0.046	SW 0.000 0.115	WSW 0.000 0.057	0.000 0.034	0.000 0.011	0.000	0.000	0.000 1.112
UMAX (M/S) 0.36 1.56 3.35	N 0.000 0.034 0.619	NNE 0.000 0.057 0.504	NE 0.000 0.115 0.504	ENE 0.000 0.172 0.355	E 0.000 0.115 0.218	ESE 0.000 0.160 0.264	SE 0.000 0.057 0.344	SSE 0.000 0.034 0.252	S 0.000 0.069 0.172	SSW 0.000 0.046 0.367	SW 0.000 0.115 0.390	WSW 0.000 0.057 0.229	0.000 0.034 0.229	0.000 0.011 0.183	0.000 0.023 0.115	0.000 0.011 0.092	0.000 1.112 4.838
UMAX (M/S) 0.36 1.56 3.35 5.59	N 0.000 0.034 0.619 0.218	NNE 0.000 0.057 0.504 0.092	NE 0.000 0.115 0.504 0.069	ENE 0.000 0.172 0.355 0.034	E 0.000 0.115 0.218 0.011	ESE 0.000 0.160 0.264 0.000	SE 0.000 0.057 0.344 0.046	SSE 0.000 0.034 0.252 0.057	S 0.000 0.069 0.172 0.160	SSW 0.000 0.046 0.367 0.195	SW 0.000 0.115 0.390 0.275	WSW 0.000 0.057 0.229 0.160	0.000 0.034 0.229 0.092	0.000 0.011 0.183 0.195	0.000 0.023 0.115 0.092	0.000 0.011 0.092 0.160	0.000 1.112 4.838 1.857
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27	N 0.000 0.034 0.619 0.218 0.000	NNE 0.000 0.057 0.504 0.092 0.000	NE 0.000 0.115 0.504 0.069 0.000	ENE 0.000 0.172 0.355 0.034 0.000	E 0.000 0.115 0.218 0.011 0.000	ESE 0.000 0.160 0.264 0.000 0.000	SE 0.000 0.057 0.344 0.046 0.000	SSE 0.000 0.034 0.252 0.057 0.011	S 0.000 0.069 0.172 0.160 0.034	SSW 0.000 0.046 0.367 0.195 0.069	SW 0.000 0.115 0.390	WSW 0.000 0.057 0.229	0.000 0.034 0.229	0.000 0.011 0.183	0.000 0.023 0.115	0.000 0.011 0.092	0.000 1.112 4.838 1.857 0.206
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95	N 0.000 0.034 0.619 0.218 0.000 0.000	NNE 0.000 0.057 0.504 0.092 0.000	NE 0.000 0.115 0.504 0.069 0.000	ENE 0.000 0.172 0.355 0.034 0.000	E 0.000 0.115 0.218 0.011 0.000 0.000	ESE 0.000 0.160 0.264 0.000 0.000	SE 0.000 0.057 0.344 0.046 0.000	SSE 0.000 0.034 0.252 0.057 0.011 0.000	S 0.000 0.069 0.172 0.160 0.034 0.000	SSW 0.000 0.046 0.367 0.195 0.069 0.000	SW 0.000 0.115 0.390 0.275 0.011 0.000	WSW 0.000 0.057 0.229 0.160 0.046 0.000	0.000 0.034 0.229 0.092 0.000	0.000 0.011 0.183 0.195 0.011 0.000	0.000 0.023 0.115 0.092 0.023 0.000	0.000 0.011 0.092 0.160 0.000	0.000 1.112 4.838 1.857 0.206 0.000
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65	N 0.000 0.034 0.619 0.218 0.000 0.000	NNE 0.000 0.057 0.504 0.092 0.000 0.000	NE 0.000 0.115 0.504 0.069 0.000 0.000	ENE 0.000 0.172 0.355 0.034 0.000 0.000	E 0.000 0.115 0.218 0.011 0.000 0.000	ESE 0.000 0.160 0.264 0.000 0.000 0.000	SE 0.000 0.057 0.344 0.046 0.000 0.000	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.000	S 0.000 0.069 0.172 0.160 0.034 0.000 0.000	SSW 0.000 0.046 0.367 0.195 0.069 0.000	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.000	WSW 0.000 0.057 0.229 0.160 0.046 0.000	0.000 0.034 0.229 0.092 0.000 0.000	0.000 0.011 0.183 0.195 0.011 0.000 0.000	0.000 0.023 0.115 0.092 0.023 0.000 0.000	0.000 0.011 0.092 0.160 0.000 0.000	0.000 1.112 4.838 1.857 0.206 0.000
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95	N 0.000 0.034 0.619 0.218 0.000 0.000	NNE 0.000 0.057 0.504 0.092 0.000	NE 0.000 0.115 0.504 0.069 0.000	ENE 0.000 0.172 0.355 0.034 0.000	E 0.000 0.115 0.218 0.011 0.000 0.000	ESE 0.000 0.160 0.264 0.000 0.000	SE 0.000 0.057 0.344 0.046 0.000	SSE 0.000 0.034 0.252 0.057 0.011 0.000	S 0.000 0.069 0.172 0.160 0.034 0.000	SSW 0.000 0.046 0.367 0.195 0.069 0.000	SW 0.000 0.115 0.390 0.275 0.011 0.000	WSW 0.000 0.057 0.229 0.160 0.046 0.000	0.000 0.034 0.229 0.092 0.000	0.000 0.011 0.183 0.195 0.011 0.000	0.000 0.023 0.115 0.092 0.023 0.000	0.000 0.011 0.092 0.160 0.000	0.000 1.112 4.838 1.857 0.206 0.000
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.000	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.000	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.000	E 0.000 0.115 0.218 0.011 0.000 0.000 0.000	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.000	SE 0.000 0.057 0.344 0.046 0.000 0.000 0.000	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.000	S 0.000 0.069 0.172 0.160 0.034 0.000 0.000	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.000	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.000	0.000 0.034 0.229 0.092 0.000 0.000 0.000	0.000 0.011 0.183 0.195 0.011 0.000 0.000	0.000 0.023 0.115 0.092 0.023 0.000 0.000	0.000 0.011 0.092 0.160 0.000 0.000 0.000	0.000 1.112 4.838 1.857 0.206 0.000 0.000 8.01%
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.000	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.69 ON OF W	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.000	E 0.000 0.115 0.218 0.011 0.000 0.000 0.000 0.34	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.000 0.42 DIRECTI ESE	SE 0.000 0.057 0.344 0.046 0.000 0.000 0.000 0.45	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.000 0.36	S 0.000 0.069 0.172 0.160 0.034 0.000 0.000 0.44 MOSPHER S	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.000 0.49	0.000 0.034 0.229 0.092 0.000 0.000 0.36	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26	0.000 1.112 4.838 1.857 0.206 0.000 0.000 8.01%
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000 0.87	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.000	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.000	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.000	E 0.000 0.115 0.218 0.011 0.000 0.000 0.000 0.34	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.000 0.42	SE 0.000 0.057 0.344 0.046 0.000 0.000 0.000 0.45	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.000 0.36	S 0.000 0.069 0.172 0.160 0.034 0.000 0.44 MOSPHER S 0.014	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 LASS D WSW 0.012	0.000 0.034 0.229 0.092 0.000 0.000 0.36	0.000 0.011 0.183 0.195 0.011 0.000 0.000	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26 NNW 0.006	0.000 1.112 4.838 1.857 0.206 0.000 0.000 8.01%
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36 1.56	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000 0.87 ENCY DIS N 0.011 0.413	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.65 TRIBUTI NNE 0.022 0.837	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.69 ON OF W NE 0.023 0.906	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.56 VIND SPE ENE 0.023 0.906	E 0.000 0.115 0.218 0.011 0.000 0.000 0.34 EED AND E 0.021 0.814	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.42 DIRECTI ESE 0.019 0.722	SE 0.000 0.057 0.344 0.046 0.000 0.000 0.45 ON SE 0.014 0.539	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.36 AT SSE 0.014 0.550	S 0.000 0.069 0.172 0.160 0.034 0.000 0.44 MOSPHER S 0.014 0.539	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015 0.573	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013 0.516	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 LASS D WSW 0.012 0.459	0.000 0.034 0.229 0.092 0.000 0.000 0.366	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40 www 0.008 0.310	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25 NW 0.005 0.195	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26 NNW 0.006 0.229	0.000 1.112 4.838 1.857 0.206 0.000 8.01% TOTAL 0.229 8.885
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36 1.56 3.35	N 0.000 0.034 0.619 0.218 0.000 0.000 0.87 ENCY DIS N 0.011 0.413 2.614	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.65 TRIBUTI NNE 0.022 0.837 4.127	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.69 ON OF W NE 0.023 0.906 1.937	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.56 VIND SPE ENE 0.023 0.906 1.525	E 0.000 0.115 0.218 0.011 0.000 0.000 0.34 ED AND E 0.021 0.814 0.848	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.42 DIRECTI ESE 0.019 0.722 0.527	SE 0.000 0.057 0.344 0.046 0.000 0.000 0.45 ON SE 0.014 0.539 0.883	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.36 AT SSE 0.014 0.550 2.625	S 0.000 0.069 0.172 0.160 0.034 0.000 0.44 MOSPHER S 0.014 0.539 1.995	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015 0.573 1.949	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013 0.516 1.674	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 LASS D WSW 0.012 0.459 0.997	0.000 0.034 0.229 0.092 0.000 0.000 0.36 W 0.010 0.378 0.653	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40 WNW 0.008 0.310 0.493	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25 NW 0.005 0.195 0.447	0.000 0.011 0.092 0.160 0.000 0.000 0.26 NNW 0.006 0.229 0.688	0.000 1.112 4.838 1.857 0.206 0.000 0.000 8.01% TOTAL 0.229 8.885 23.983
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36 1.56 3.35 5.59	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000 0.000 0.001 N 0.011 0.413 2.614 1.410	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.005 TRIBUTI NNE 0.022 0.837 4.127 1.066	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.69 ON OF W NE 0.023 0.906 1.937 0.092	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.000 0.56 IIND SPE ENE 0.023 0.906 1.525 0.023	E 0.000 0.115 0.218 0.011 0.000 0.000 0.34 ED AND E 0.021 0.814 0.848 0.023	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.42 DIRECTI ESE 0.019 0.722 0.527 0.023	SE 0.000 0.057 0.344 0.000 0.000 0.000 0.45 ON SE 0.014 0.539 0.883 0.252	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.36 AT SSE 0.014 0.550 2.625 0.642	S 0.000 0.069 0.172 0.160 0.034 0.000 0.44 MOSPHER S 0.014 0.539 1.995 1.433	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015 0.573 1.949 0.848	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013 0.516 1.674 0.539	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 CLASS D WSW 0.012 0.459 0.997 0.539	0.000 0.034 0.229 0.092 0.000 0.000 0.36 W 0.010 0.378 0.653 0.241	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40 www 0.008 0.310 0.493 0.287	0.000 0.023 0.115 0.092 0.023 0.023 0.000 0.000 0.25	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26 NNW 0.006 0.229 0.688 0.631	0.000 1.112 4.838 1.857 0.206 0.000 0.000 8.01% TOTAL 0.229 8.885 23.983 8.231
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36 1.56 3.35 5.59 8.27	N 0.000 0.034 0.619 0.218 0.000 0.000 0.87 ENCY DIS N 0.011 0.413 2.614	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.65 TRIBUTI NNE 0.022 0.837 4.127	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.69 ON OF W NE 0.023 0.906 1.937	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.56 VIND SPE ENE 0.023 0.906 1.525	E 0.000 0.115 0.218 0.011 0.000 0.000 0.34 ED AND E 0.021 0.814 0.848	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.42 DIRECTI ESE 0.019 0.722 0.527 0.023 0.000	SE 0.000 0.057 0.344 0.000 0.000 0.000 0.45 ON SE 0.014 0.539 0.883 0.252 0.057	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.36 AT SSE 0.014 0.550 2.625 0.642 0.195	S 0.000 0.000 0.162 0.160 0.034 0.000 0.44 MOSPHER S 0.014 0.539 1.995 1.433 0.287	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015 0.573 1.949 0.848 0.160	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013 0.516 1.674 0.539 0.057	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 LASS D WSW 0.012 0.459 0.997 0.539 0.057	0.000 0.034 0.229 0.092 0.000 0.000 0.36 W 0.010 0.378 0.653 0.241 0.000	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40 WNW 0.008 0.310 0.493 0.287	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25 NW 0.005 0.195 0.447 0.183 0.103	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26 NNW 0.006 0.229 0.683 0.631	0.000 1.112 4.838 1.857 0.206 0.000 8.01% TOTAL 0.229 8.885 23.983 8.231 1.181
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000 0.001 0.011 0.413 2.614 1.410 0.092 0.000	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.000 0.65 TRIBUTI NNE 0.022 0.837 4.127 1.066 0.011 0.000	NE 0.000 0.115 0.504 0.006 0.000 0.000 0.69 CN OF W NE 0.023 0.906 1.937 0.092 0.000	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.56 VIND SPE ENE 0.023 0.906 1.525 0.023 0.000 0.000	E 0.000 0.115 0.218 0.0011 0.000 0.000 0.34 EED AND E 0.021 0.814 0.848 0.023 0.000 0.000	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.42 DIRECTI ESE 0.019 0.722 0.527 0.023 0.000	SE 0.000 0.057 0.344 0.046 0.000 0.000 0.45 ON SE 0.014 0.539 0.883 0.252 0.057 0.000	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.36 AT SSE 0.014 0.550 0.642 0.195 0.011	S 0.000 0.069 0.172 0.160 0.034 0.000 0.44 MOSPHER S 0.014 0.539 1.995 1.433 0.287 0.023	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015 0.573 1.949 0.848 0.160 0.000	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013 0.516 1.674 0.539 0.057 0.000	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 CLASS D WSW 0.012 0.459 0.997 0.539 0.057 0.000	0.000 0.034 0.229 0.092 0.000 0.000 0.36 W 0.010 0.378 0.653 0.241 0.000 0.000	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40 www 0.008 0.310 0.493 0.287 0.023 0.000	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25 NW 0.005 0.195 0.447 0.183 0.103	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26 NNW 0.006 0.229 0.681 0.138	0.000 1.112 4.838 1.857 0.206 0.000 8.01% TOTAL 0.229 8.885 23.983 8.231 1.181 0.034
UMAX (M/S) 0.36 1.56 3.35 5.59 8.27 10.95 15.65 TOTAL JOINT FREQUE UMAX (M/S) 0.36 1.56 3.35 5.59 8.27	N 0.000 0.034 0.619 0.218 0.000 0.000 0.000 0.001 0.413 2.614 1.410 0.092	NNE 0.000 0.057 0.504 0.092 0.000 0.000 0.65 TRIBUTI NNE 0.022 0.837 4.127 1.066 0.011	NE 0.000 0.115 0.504 0.069 0.000 0.000 0.69 ON OF W NE 0.023 0.906 1.937 0.092 0.000	ENE 0.000 0.172 0.355 0.034 0.000 0.000 0.56 HIND SPE ENE 0.023 0.906 1.525 0.023 0.000	E 0.000 0.115 0.218 0.0011 0.000 0.000 0.34 ED AND E 0.021 0.814 0.848 0.023 0.000	ESE 0.000 0.160 0.264 0.000 0.000 0.000 0.42 DIRECTI ESE 0.019 0.722 0.527 0.023 0.000	SE 0.000 0.057 0.344 0.000 0.000 0.000 0.45 ON SE 0.014 0.539 0.883 0.252 0.057	SSE 0.000 0.034 0.252 0.057 0.011 0.000 0.36 AT SSE 0.014 0.550 2.625 0.642 0.195	S 0.000 0.000 0.162 0.160 0.034 0.000 0.44 MOSPHER S 0.014 0.539 1.995 1.433 0.287	SSW 0.000 0.046 0.367 0.195 0.069 0.000 0.68 IC STAB SSW 0.015 0.573 1.949 0.848 0.160	SW 0.000 0.115 0.390 0.275 0.011 0.000 0.79 ILITY C SW 0.013 0.516 1.674 0.539 0.057	WSW 0.000 0.057 0.229 0.160 0.046 0.000 0.49 LASS D WSW 0.012 0.459 0.997 0.539 0.057	0.000 0.034 0.229 0.092 0.000 0.000 0.36 W 0.010 0.378 0.653 0.241 0.000	0.000 0.011 0.183 0.195 0.011 0.000 0.000 0.40 WNW 0.008 0.310 0.493 0.287	0.000 0.023 0.115 0.092 0.023 0.000 0.000 0.25 NW 0.005 0.195 0.447 0.183 0.103	0.000 0.011 0.092 0.160 0.000 0.000 0.000 0.26 NNW 0.006 0.229 0.688 0.631 0.138	0.000 1.112 4.838 1.857 0.206 0.000 8.01% TOTAL 0.229 8.885 23.983 8.231 1.181

Page 34 of 39

TABLE VII-A (Continued) JOINT OCCURRENCE FREQUENCIES FOR LOWNDDEG AND LOWNDSPD - GROUND CONTINUOUS RELEASES

JOINT FREQU	ENCY DIS	TRIBUTI	ON OF W	IND SPE	ED AND	DIRECTI	ON	TA	MOSPHER	IC STAE	ILITY C	LASS E					
UMAX (M/S)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
0.36	0.015	0.028	0.018	0.012	0.008	0.007	0.018	0.047	0.063	0.080	0.062	0.049	0.030	0.026	0.019	0.022	0.504
1.56	0.298	0.539	0.344	0.241	0.160	0.126	0.355	0.906	1.227	1.548	1.204	0.940	0.573	0.493	0.367	0.424	9.744
3.35	0.436	0.160	0.160	0.023	0.080	0.034	0.034	1.089	1.525	1.250	0.963	0.516	0.642	0.470	0.562	1.422	9.366
5.59	0.011	0.000	0.000	0.000	0.000	0.000	0.000	0.069	0.275	0.103	0.103	0.046	0.069	0.011	0.057	0.413	1.158
8.27	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.011	0.000	0.000	0.000	0.000	0.000	0.000	0.011	0.023
10.95	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
15.65	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL	0.76	0.73	0.52	0.28	0.25	0.17	0.41	2.11	3.10	2.98	2.33	1.55	1.31	1.00	1.00	2.29	20.80%
JOINT FREOU	ENCY DIS	TRIBUTI	ON OF W	IND SPE	ED AND	DIRECTI	ON	АТ	MOSPHER	RIC STAE	ILITY C	LASS F					
UMAX (M/S)	N N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
0.36	0.055	0.026	0.009	0.005	0.000	0.002	0.024	0.109	0.115	0.095	0.098	0.088	0.067	0.044	0.078	0.102	0.917
1.56	0.344	0.160	0.057	0.034	0.000	0.011	0.149	0.688	0.722	0.596	0.619	0.550	0.424	0.275	0.493	0.642	5.766
3.35	0.069	0.000	0.011	0.000	0.000	0.000	0.011	0.115	0.069	0.183	0.310	0.092	0.069	0.103	0.344	1.101	2.476
5.59	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.011	0.011	0.023	0.046
8.27	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
10.95	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
15.65	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL	0.47	0.19	0.08	0.04	0.00	0.01	0.18	0.91	0.91	0.87	1.03	0.73	0.56	0.43	0.93	1.87	9.21%
JOINT FREOU	ENCV DIC	ייים דבוויי	ON OF W	ITMT) CDE	מאג משי	DIRECTI	ON	ልጥ	MOSPHER	RIC STAE	עידודע כ	T.ASS G					
UMAX (M/S)	N N	NNE	NE NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
0.36	0.092	0.005	0.000	0.005	0.009	0.014	0.046	0.207	0.216	0.170	0.156	0.179	0.129	0.170	0.353	0.372	2.121
1.56	0.229	0.011	0.000	0.011	0.023	0.034	0.115	0.516	0.539	0.424	0.390	0.447	0.321	0.424	0.883	0.929	5.296
3.35	0.023	0.000	0.000	0.000	0.000	0.000	0.000	0.011	0.000	0.000	0.000	0.046	0.023	0.000	0.183	0.287	0.573
5.59	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
8.27	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
10.95	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
15.65	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL	0.34	0.02	0.00	0.02	0.03	0.05	0.16	0.73	0.75	0.59	0.55	0.67	0.47	0.59	1.42	1.59	7.99%

TOTAL HOURS IN YEAR: 8760 TOTAL HOURS MISSING: 37

TOTAL HOURS CONSIDERED: 8723

TOTAL CALM HOURS: 331

Page 35 of 39

ADDENDUM 1

CHANGES TO ODCM, PCP, AND RADIOACTIVE WASTE SYSTEMS

TABLE OF CONTENTS

<u>Descr</u>	<u>iption</u>	<u>Page</u>
I.	Changes to the Offsite Dose Calculation Manual (ODCM)	36
II.	Changes to the Radioactive Waste Systems	36
III.	Changes to the Process Control Program (PCP)	36
IV.	Changes to the Land Use Census	36
V.	Instrument Inoperability	37
VI.	Liquid Holdup Tank Curie Limit	37
VII.	Waste Gas Decay Tank Curie Limit	37
VIII.	Missed Compensatory Samples	
IX.	Special Ground Water Protection Requirements	37
X.	Missed ODCM Samples	

Page 36 of 39

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

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

ODCM, Revision 33 Description of Changes

- 1) Page 2-4, Section 2.1.2 was revised to add guidance for the use of Cs-134 as a default radionuclide when no gamma emitting nuclides are present.
- 2) Page 2-27, Table 2.6-1, item 4.d was revised to delete minimum channel operable (MCO) requirements for outside temporary tanks.
- 3) Page 2-30 was revised by deleting Note 2 from Table 2.6-1 which defines an outside temporary tank.
- 4) Pages 3-102 through 3-107, Section 3.16 has been added detailing the methodology for the calculation of gaseous dose from C-14.

II. CHANGES TO THE RADIOACTIVE WASTE SYSTEMS

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

III. CHANGES TO THE PROCESS CONTROL PROGRAM (PCP)

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

IV. CHANGES TO THE LAND USE CENSUS

The Land Use Census is currently performed every 12 months and was last performed in 2011. The results of the 2011 Land Use Census and average meteorological data for the last 10 years identified no changes that required an ODCM change. The next Land Use Census will be performed in 2012.

V. INSTRUMENT INOPERABILITY

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

VI. <u>LIQUID HOLDUP TANK CURIE LIMIT</u>

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

VII. WASTE GAS DECAY TANK CURIE LIMIT

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

VIII. MISSED COMPENSATORY SAMPLES

There were no instances of missed compensatory samples during this reporting period.

IX. SPECIAL GROUND WATER PROTECTION REQUIREMENTS

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

Additional groundwater monitoring wells were sampled and analyzed during 2011 as part of the NEI Groundwater Protection Initiative. There were a total of seventeen wells monitored, fifteen of which are described in the ODCM and will be addressed in the Annual Radiological Environmental Operating Report. For the two wells not in the ODCM program, no plant related gamma activity was detected. Low level tritium activity was found in the wells. The following are the tritium results from the two additional wells:

Groundwater Tritium - 2011							
	pCi/L						
Well ID	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter			
PDW-05	345	320	396	395			
TS-07B	294	263	463	372			

X. MISSED ODCM SAMPLES

There were no failures to meet the ODCM specified sample frequencies or analyses during this reporting period.

ADDENDUM 2

CORRECTIONS TO PREVIOUS REPORTS

TABLE OF CONTENTS

	<u>Description</u>	<u>Page</u>
I.	DISCUSSION	39

I. <u>DISCUSSION</u>

There is one correction to the previous 2010 report letter 11-0027, dated April 26, 2011. Page 20 of 40, which contained the continued <u>Table IV -A</u>, <u>EFFLUENT AND WASTE DISPOSAL</u> <u>Annual Report -2009</u> should be 2010. A copy of the corrected page is attached.

Page 20 of 40

TABLE IV-A (Continued) <u>EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT - 2010</u> <u>LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES</u>

	Unit	Quarter 3	Quarter 4	Est. Total Error %
Fission and Activation Products				
Total release (not including tritium, gases, alpha)	Ci	8.46E-04	2.83E-04	1.07E+01
Average diluted concentration during period	μCi/ml	3.32E-12	1.07E-12	
Tritium				
1. Total release	Ci	7.83E+00	8.31E+01	9.20E+00
Average diluted concentration during period	μCi/ml	3.07E-08	3.15E-07	
Dissolved and entrained gases				
1. Total release	Ci	1.22E-04	2.23E-03	9.60E+00
Average diluted concentration during period	μCi/ml	4.78E-13	8.46E-12	
3. Percent of applicable limit	%	2.39E-07	4.23E-06	
Gross alpha radioactivity				
1. Total release	Ci	ND	ND	1.83E+01
				_
Volume of waste released prior to dilution	Liters	5.73E+05	5.68E+05	
				1
Volume of dilution water used during period	Liters	2.55E+11	2.64E+11	
Percent of 10 CFR 50, Appendix I				
1. Quarterly Limit				
- · · · · · · · · · · · · · · · · · · ·	70	1.47E-U4	1.40E-U3	
	0/	1 445 02	1 665 02	
Total body	% %	1.44E-03 3.01E-03	3.75E-03	
	1. Total release (not including tritium, gases, alpha) 2. Average diluted concentration during period Tritium 1. Total release 2. Average diluted concentration during period Dissolved and entrained gases 1. Total release 2. Average diluted concentration during period 3. Percent of applicable limit Gross alpha radioactivity 1. Total release Volume of waste released prior to dilution Volume of dilution water used during period Percent of 10 CFR 50, Appendix I 1. Quarterly Limit Organ: Liver, GI-LLI¹ Total body 2. Annual Limit* Organ:, GI-LLI	1. Total release (not including tritium, gases, alpha) 2. Average diluted concentration during period Tritium 1. Total release 2. Average diluted concentration during period Dissolved and entrained gases 1. Total release 2. Average diluted concentration during period Dissolved and entrained gases 1. Total release Ci 2. Average diluted concentration during period 3. Percent of applicable limit % Gross alpha radioactivity 1. Total release Ci Volume of waste released prior to dilution Liters Volume of dilution water used during period Percent of 10 CFR 50, Appendix I 1. Quarterly Limit Organ: Liver, GI-LLI¹ Total body 2. Annual Limit* Organ:, GI-LLI % Vogan:, GI-LLI % %	Fission and Activation Products 1. Total release (not including tritium, gases, alpha) 2. Average diluted concentration during period Tritium 1. Total release Ci 7.83E+00 2. Average diluted concentration during period Dissolved and entrained gases 1. Total release Ci 1.22E-04 2. Average diluted concentration during period Dissolved and entrained gases 1. Total release Ci 1.22E-04 2. Average diluted concentration during period 3. Percent of applicable limit % 2.39E-07 Gross alpha radioactivity 1. Total release Ci ND Volume of waste released prior to dilution Liters Volume of dilution water used during period Liters Percent of 10 CFR 50, Appendix I 1. Quarterly Limit Organ: Liver, GI-LLI¹ Organ: Liver, GI-LLI¹ Organ: GI-LLI % 5.23E-05 Total body 2. Annual Limit* Organ:, GI-LLI % 1.44E-03	Fission and Activation Products 1. Total release (not including tritium, gases, alpha) Ci 8.46E-04 2.83E-04 2.83E-04 2. Average diluted concentration during period μCi/ml 3.32E-12 1.07E-12 1.07E-13 1.07E-08 1.15E-07 1.15E-07

¹ Liver for Quarter 3 & GI-LLI, gastrointestinal-lower large intestine for Quarter 4 *Cumulative total for the year-to-date using the methodology in the ODCM.