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May 14, 2012

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Subject: 2011 Annual Radiological Environmental Operating Report  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
License No. DPR-28

Dear Sir or Madam,

In accordance with Vermont Yankee Technical Specification 6.6.E, attached is a copy of the 2011 Annual Radiological Environmental Operating Report. This report contains a summary and analysis of the radiological environmental data collected for the calendar year 2011.

There are no new regulatory commitments being made in this submittal.

Should you have any questions or require additional information concerning this submittal, please contact me at (802) 451-3166.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Wanczyk".

[RJW/JTM]

Attachment 1: Annual Radiological Environmental Operating Report – Year 2011

cc listing (next page)

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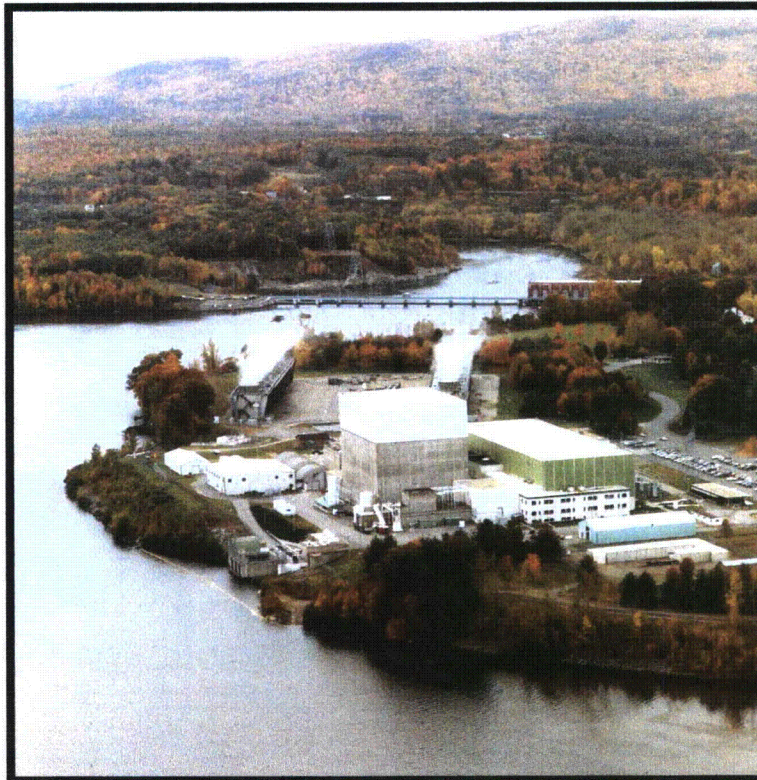
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**ENTERGY - VERMONT YANKEE  
Vermont Yankee Nuclear Power Station**

**ANNUAL RADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT**

**Year 2011**



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## 1. INTRODUCTION

This report summarizes the findings of the Radiological Environmental Monitoring Program (REMP) conducted by Entergy-Vermont Yankee in the vicinity of the Vermont Yankee Nuclear Power Station (VYNPS) in Vernon, Vermont during the calendar year 2011. The analyses of samples collected indicated that no plant-generated radioactive material was found in any location off site. In all cases, the possible radiological impact was negligible with respect to exposure from natural background radiation. In no case did the detected levels exceed the most restrictive federal regulatory or plant license limits for radionuclides in the environment. Measured values were several orders of magnitude below reportable levels listed in Table 4.5 of this report. Except for sample deviations listed in Section 6.1, all other samples were collected and analyzed as required by the program.

This report is submitted annually in compliance with plant Technical Specification 6.6.E. The remainder of this report is organized as follows:

Section 2: Provides an introductory explanation of background radioactivity and radiation detected in the plant environs.

Section 3: Provides a brief description of the Vermont Yankee Nuclear Power Station site and its environs.

Section 4: Provides a description of the overall REMF program design. Included is a summary of the Vermont Yankee Nuclear Power Station (VYNPS) Off-Site Dose Calculation Manual (ODCM) requirements for REMF sampling, tables listing all locations sampled or monitored in 2011 with compass sectors and distances from the plant, and maps showing each REMF location. Tables listing Lower Limit of Detection requirements and Reporting Levels are also included.

Section 5: Consists of the summarized data as required by the VYNPS ODCM. The tables are in a format similar to that specified by the NRC Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 1). Also included is a summary of the 2011 environmental TLD measurements.

Section 6: Provides the results of the 2011 monitoring program. The performance of the program in meeting regulatory requirements as given in the ODCM is discussed, and the data acquired during the year are analyzed.

Section 7: Provides an overview of the Quality Assurance programs used at AREVA Framatome ANP Environmental Laboratory, Teledyne Brown Engineering and Entergy James A. Fitzpatrick Environmental Laboratory.

Section 8: Summarizes the requirements and the results of the 2011 Land Use Census.

Section 9: Gives a summary of the 2011 Radiological Environmental Monitoring Program.

## **2. BACKGROUND RADIOACTIVITY**

Radiation or radioactivity potentially detected in the Vermont Yankee environment can be grouped into three categories. The first is “naturally-occurring” radiation and radioactivity. The second is “man-made” radioactivity from sources other than the Vermont Yankee plant. The third potential source of radioactivity is due to emissions from the Vermont Yankee plant. For the purposes of the Vermont Yankee REMP, the first two categories are classified as “background” radiation, and are the subject of discussion in this section of the report. The third category is the one that the REMP is designed to detect and evaluate.

### **2.1 Naturally Occurring Background Radioactivity**

Natural radiation and radioactivity in the environment, which provide the major source of human radiation exposure, may be subdivided into three separate categories: “primordial radioactivity,” “cosmogenic radioactivity” and “cosmic radiation.” “Primordial radioactivity” is made up of those radionuclides that were created with the universe and that have a sufficiently long half-life to be still present on the earth. Included in this category are the newly-formed “daughter” radionuclides descending from these original elements. A few of the more important radionuclides in this category are Uranium-238 (U-238), Thorium-232 (Th-232), Rubidium-87 (Rb-87), Potassium-40 (K-40), Radium-226 (Ra-226), and Radon-222 (Rn-222). Uranium-238 and Thorium-232 are readily detected in soil and rock, whether through direct field measurements or through laboratory analysis of samples. Radium-226 in the earth can find its way from the soil into ground water, and is often detectable there. Radon-222 is one of the components of natural background in air, and its daughter products are detectable on air sampling filters. Potassium-40 comprises about 0.01 percent of all natural potassium in the earth, and is consequently detectable in most biological substances, including the human body. There are many more primordial radionuclides found in the environment in addition to the major ones discussed above (Reference 2).

The second sub-category of naturally-occurring radiation and radioactivity is “cosmogenic radioactivity.” This is produced through the nuclear interaction of high energy cosmic radiation with elements in the earth’s atmosphere, and to a much lesser degree, in the earth’s crust. These radioactive elements are then incorporated into the entire geosphere and atmosphere, including the earth’s soil, surface rock, biosphere, sediments, ocean floors, polar ice and atmosphere. The major radionuclides in this category are Carbon-14 (C-14), Hydrogen-3 (H-3 or Tritium), Sodium-22 (Na-22), and Beryllium-7 (Be-7). Beryllium-7 is the one most readily detected, and is found on air sampling filters and occasionally in biological media (Reference 2).



The third sub-category of naturally-occurring radiation and radioactivity is “cosmic radiation.” This consists of high energy atomic and sub-atomic particles of extra-terrestrial origin and the secondary particles and radiation that are produced through their interaction in the earth’s atmosphere. The majority of this radiation comes from outside of our solar system, and to a lesser degree from the sun. We are protected from most of this radiation by the earth’s atmosphere, which absorbs the radiation. Consequently, one can see that with increasing elevation one would be exposed to more cosmic radiation as a direct result of a thinner layer of air for protection. This “direct radiation” is detected in the field with gamma spectroscopy equipment, high pressure ion chambers and thermoluminescent dosimeters (TLDs).

## **2.2 Man-Made Background Radioactivity**

The second source of “background” radioactivity in the Vermont Yankee environment is from “man-made” sources not related to the power plant. The most recent contributor (prior to year 2011) to this category was the fallout from the Chernobyl accident in April of 1986, which was detected in the Vermont Yankee environment and other parts of the world. Some smaller amounts of radioactivity were detected in the environment following the Fukushima Daiichi plants accidents in March 2011. A much greater contributor to this category, however, has been fallout from atmospheric nuclear weapons tests. Tests were conducted from 1945 through 1980 by the United States, the Soviet Union, the United Kingdom, China and France, with the large majority of testing occurring during the periods 1954-1958 and 1961-1962. (A test ban treaty was signed in 1963 by the United States, Soviet Union and United Kingdom, but not by France and China.) Atmospheric testing was conducted by the People’s Republic of China as recently as October 1980. Much of the fallout detected today is due to this explosion and the last large scale one, done in November of 1976 (Reference 3).

The radioactivity produced by these detonations was deposited worldwide. The amount of fallout deposited in any given area is dependent on many factors, such as the explosive yield of the device, the latitude and altitude of the detonation, the season in which it occurred, and the timing of subsequent rainfall which washes fallout from the troposphere (Reference 4). Most of this fallout has decayed into stable elements, but the residual radioactivity is still readily detectable in environmental samples worldwide. The two predominant radionuclides are Cesium-137 (Cs-137) and Strontium-90 (Sr-90). They are found in soil and in vegetation, and since cows and goats graze large areas of vegetation, these radionuclides are also often detected in milk.

Other potential “man-made” sources of environmental “background” radioactivity include other nuclear power plants, coal-fired power plants, national defense installations, hospitals, research laboratories and

industry. These, collectively, are insignificant on a global scale when compared to the sources discussed above (natural and fallout).

### **3. GENERAL PLANT AND SITE INFORMATION**

The Vermont Yankee Nuclear Power Station is located in the town of Vernon, Vermont in Windham County. The 130-acre site is on the west shore of the Connecticut River, immediately upstream of the Vernon Hydroelectric Station. The plant site is bounded on the north, south and west by privately-owned land, and on the east by the Connecticut River. The surrounding area is generally rural and lightly populated, and the topography is flat or gently rolling on the valley floor.

Construction of the single unit 540 megawatt BWR (Boiling Water Reactor) plant began in 1967. The pre-operational Radiological Environmental Monitoring Program, designed to measure environmental radiation and radioactivity levels in the area prior to station operation, began in 1970. Commercial operation began on November 30, 1972. An Extended Power Uprate, conducted in 2006, resulted in the present generation capacity of 650 megawatts electric.

#### 4. PROGRAM DESIGN

The Radiological Environmental Monitoring Program (REMP) for the Vermont Yankee Nuclear Power Station (VYNPS) was designed with specific objectives in mind. These are:

- To provide an early indication of the appearance or accumulation of any radioactive material in the environment caused by the operation of the station.
- To provide assurance to regulatory agencies and the public that the station's environmental impact is known and within anticipated limits.
- To verify the adequacy and proper functioning of station effluent controls and monitoring systems.
- To provide standby monitoring capability for rapid assessment of risk to the general public in the event of unanticipated or accidental releases of radioactive material.

The program was initiated in 1970, approximately two years before the plant began commercial operation. It has been in operation continuously since that time, with improvements made periodically over those years.

The current program is designed to meet the intent of NRC Regulatory Guide 4.1, *Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants*; NRC Regulatory Guide 4.8, *Environmental Technical Specifications for Nuclear Power Plants*; the NRC Radiological Assessment Branch Technical Position of November 1979, *An Acceptable Radiological Environmental Monitoring Program*; and NRC NUREG-0473, *Radiological Effluent Technical Specifications for BWRs*. The environmental TLD program has been designed and tested around NRC Regulatory Guide 4.13, *Performance, Testing and Procedural Specifications for Thermoluminescence Dosimetry: Environmental Applications*. The quality assurance program is designed around the guidance given in NRC Regulatory Guide 4.15, *Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment*.

The sampling requirements of the REMP are given in the Off-Site Dose Calculation Manual Table 3.5.1 and are summarized in Table 4.1 of this report. The identification of the required sampling locations is given in the Off-Site Dose Calculation Manual (ODCM), Chapter 7. These sampling and monitoring locations are shown graphically on the maps in Figures 4.1 through 4.6 of this report.

The Vermont Yankee Chemistry Department conducts the radiological environmental monitoring program and collects all airborne, terrestrial and ground water samples. VYNPS maintains a contract with Normandeau Associates to collect all fish, river water and river sediment samples. In 2011, analytical measurements of environmental samples were performed at the Entergy Nuclear Northeast J. A. Fitzpatrick N.P.P Environmental laboratory in Oswego, New York. TLD badges are posted and retrieved by the Vermont Yankee Chemistry Department, and were analyzed by the AREVA NP INC. Environmental Laboratory in Westborough, Massachusetts.

#### **4.1 Monitoring Zones**

The REMP is designed to allow comparison of levels of radioactivity in samples from the area possibly influenced by the plant to levels found in areas not influenced by the plant. Monitoring locations within the first zone are called "indicators." Those within the second zone are called "controls." The distinction between the two zones, depending on the type of sample or sample pathway, is based on one or more of several factors, such as site meteorological history, meteorological dispersion calculations, relative direction from the plant, river flow, and distance. Analysis of survey data from the two zones aids in determining if there is a significant difference between the two areas. It can also help in differentiating between radioactivity and radiation due to plant releases and that due to other fluctuations in the environment, such as atmospheric nuclear weapons test fallout or seasonal variations in the natural background.

#### **4.2 Pathways Monitored**

Four pathway categories are monitored by the REMP. They are the airborne, waterborne, ingestion and direct radiation pathways. Each of these four categories is monitored by the collection of one or more sample media, which are listed below, and are described in more detail in this section:

##### Airborne Pathway

- Air Particulate Sampling
- Charcoal Cartridge (Radioiodine) Sampling

##### Waterborne Pathways

- River Water Sampling
- Ground Water Sampling
- Sediment Sampling

##### Ingestion Pathways

- Milk Sampling
- Silage Sampling
- Mixed Grass Sampling
- Fish Sampling

##### Direct Radiation Pathway

- TLD Monitoring

### **4.3 Descriptions of Monitoring Programs**

#### **4.3.1 Air Sampling**

Continuous air samplers are installed at seven locations. (Five are required by the VYNPS ODCM.) The sampling pumps at these locations operate continuously at a flow rate of approximately one cubic foot per minute. Airborne particulates are collected by passing air through a 50 mm glass-fiber filter. A dry gas meter is incorporated into the sampling stream to measure the total volume of air sampled in a given interval. The entire system is housed in a weatherproof structure. The filters are collected on a weekly frequency and, to allow for the decay of radon daughter products, the analysis for gross beta radioactivity is delayed for more than 24 hours. The weekly filters are composited by location at the environmental laboratory for a quarterly gamma spectroscopy analysis.

If the gross-beta activity on an air particulate sample is greater than ten times the yearly mean of the control samples, ODCM Table 3.5.1, Note c, requires a gamma isotopic analysis on the sample. Whenever the main plant stack effluent release rate of I-131 is equal to or greater than 0.1  $\mu\text{Ci}/\text{sec}$ , weekly air particulate collection from the plant stack is required by ODCM Table 3.5.1, Note h.

#### **4.3.2 Charcoal Cartridge (Radioiodine) Sampling**

Continuous air samplers are installed at seven locations. (Five are required by the ODCM Table 3.5.1.) The sampling pumps at these locations operate continuously at a flow rate of approximately one cubic foot per minute. A 60 cc TEDA-impregnated charcoal cartridge is located downstream of the air particulate filter described in Section 4.3.1 above. A dry gas meter is incorporated into the sampling stream to measure the total volume of air sampled in a given interval. The entire system is housed in a weatherproof structure. These cartridges are collected and analyzed weekly for I-131.

Whenever the main plant stack effluent release rate of I-131 is equal to or greater than 0.1  $\mu\text{Ci}/\text{sec}$ , weekly charcoal cartridge collection from the plant stack is required, pursuant to ODCM Table 3.5.1, Note h.

#### **4.3.3 River Water Sampling**

An automatic compositing sampler is maintained at the downstream sampling location by the Vermont Yankee Chemistry Department staff. Normandeau Associates personnel maintain the pump that delivers river water to the sampler. The sampler is controlled by a timer that collects a frequent aliquot of river water. An additional grab sample is collected monthly at the upstream control location. Each sample is analyzed for gamma-emitting radionuclides. Although not required by the VYNPS ODCM, a gross-beta analysis is also performed on each sample. The monthly composite and grab samples are composited by location by the contracted environmental laboratory for a quarterly tritium (H-3) analysis.

#### **4.3.4 Ground Water (Deep Well Potable Water) Sampling**

Grab samples are collected quarterly from up to four indicator locations and one control location. Only one indicator and one control are required by the VYNPS ODCM. Each sample is analyzed for gamma-emitting radionuclides and H-3. Although not required by the VYNPS ODCM, a gross-beta analysis is also performed on each sample.

#### **4.3.5 Sediment Sampling**

River sediment grab samples are collected semiannually from the downriver location and at the North Storm Drain Outfall by Normandeau Associates. Each sample is analyzed at an offsite environmental laboratory for gamma-emitting radionuclides.

#### **4.3.6 Milk Sampling**

When milk animals are identified as being on pasture (May through October), milk samples are collected twice per month from that location. Throughout the rest of the year, and for the full year where animals are not on pasture, milk samples are collected on a monthly schedule. Three locations are chosen as a result of the annual Land Use Census, based on meteorological dispersion calculations. The fourth location is a control, which is located sufficiently far away from the plant to be outside any potential plant influence. Other samples may be collected from locations of interest.

Immediately after collection, each milk sample is refrigerated and then shipped to the contracted environmental laboratory. Each sample is analyzed for gamma-emitting radionuclides. A separate low-level I-131 analysis is performed to meet the Lower Limit of Detection requirements in the ODCM. Although not required by the ODCM, Sr-89 and Sr-90 analyses are also performed on quarterly composited samples.

#### **4.3.7 Silage (Chopped Corn or Grass) Sampling**

Silage samples are collected at the milk sampling location at the time of harvest, if available. The silage from each location is shipped to the contracted environmental laboratory where it is analyzed for gamma-emitting radionuclides. Although not required by the ODCM, the silage samples are analyzed for low-level I-131.

#### **4.3.8 Mixed Grass Sampling**

At each air sampling station, a mixed grass sample is collected quarterly, when available. Enough grass is clipped to provide the minimal sample weight needed to achieve the required Lower Limit of Detection (LLD). The mixed grass samples are analyzed for gamma-emitting radionuclides. Although not required by the ODCM, the grass samples are analyzed for low-level I-131.

#### **4.3.9 Fish Sampling**

Fish samples are collected semiannually at two Connecticut River locations (upstream of the plant and in the Vernon Pond) by Normandeau Associates. The samples are frozen and delivered to the environmental laboratory where the edible portions are analyzed for gamma-emitting radionuclides.

#### **4.3.10 TLD Monitoring**

Direct gamma radiation exposure is continuously monitored with the use of thermoluminescent dosimeters (TLDs). Specifically, Panasonic UD-801AS1 and UD-814AS1 calcium sulfate dosimeters are used, with a total of five elements in place at each monitoring location. Each pair of dosimeters is sealed in a plastic bag, which is in turn housed in a plastic screen cylinder. This cylinder is attached to an object such as a fence or utility pole.

A total of 40 stations are required by the ODCM. Of these, 24 must be read out quarterly, while those from the remaining 16 incident response (outer ring) stations need only be de-dosed (annealed) quarterly, unless an ODCM gaseous release limit was exceeded during the period. Although not required by the ODCM, the TLDs from the 16 outer ring stations are read out quarterly along with the other stations' TLDs. In addition to the TLDs required by the ODCM, more than thirteen are typically posted at or near the site boundary. The plant staff posts and retrieves all TLDs, while the contracted environmental laboratory (Stanford Dosimetry) provides processing.

**TABLE 4.1**

**RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM**

(as required by ODCM Table 3.5.1)\*

Exposure Pathway and/or Sample Media	Collection			Analysis	
	Number of Sample Locations	Routine Sampling Mode	Collection Frequency	Analysis Type	Analysis Frequency
1. Direct Radiation (TLDs)	40	Continuous	Quarterly	Gamma dose – Once per quarter Outer Ring Incident Response - de-dose only quarterly, unless gaseous release Controls were exceeded.	Quarterly - Each TLD
2. Airborne (Particulates and Radioiodine)	5	Continuous	Weekly	Particulate Sample: Gross Beta  Gamma Isotopic  Radioiodine Canister: I-131	Each Sample  Quarterly Composite (by location)  Each Sample
3. Waterborne					
a. Surface water	2	Downstream. Automatic composite Upstream: grab	Monthly	Gamma Isotopic Tritium (H-3)	Each Sample Quarterly Composite
b. Ground water	3	Grab	Quarterly	Gamma Isotopic Tritium (H-3)	Each Sample Each Sample
c. Shoreline Sediment	2	Downstream: grab N. Storm Drain Outfall: grab	Semiannually	Gamma Isotopic	Each Sample

- See ODCM Table 3.5.1 for complete footnotes.



**TABLE 4.1, cont.**

**RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM**  
**(as required by ODCM Table 3.5.1)\***

Exposure Pathway and/or Sample Media	Collection			Analysis	
	Nominal Number of Sample Locations	Routine Sampling Mode	Nominal Collection Frequency	Analysis Type	Analysis Frequency
4. Ingestion					
a. Milk	4	Grab	Monthly (Semimonthly when on pasture)	Gamma Isotopic I-131	Each sample Each sample
b. Fish	2	Grab	Semiannually	Gamma Isotopic on edible portions	Each sample
c. Vegetation					
Grass sample	1 at each air sampling station	Grab	Quarterly when available	Gamma Isotopic	Each sample
Silage sample	1 at each milk sampling station	Grab	At harvest	Gamma Isotopic	Each sample

\* See ODCM Table 3.5.1 for complete footnotes.

**TABLE 4.2**

**RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2011  
VERMONT YANKEE NUCLEAR POWER STATION**

<u>Exposure Pathway</u>	<u>Station Code</u>	<u>Station Description</u>	<u>Zone<sup>(a)</sup></u>	<u>Distance From Plant Stack (km)</u>	<u>Direction From Plant</u>
<b>I. Airborne</b>					
	AP/CF-11	River Sta. No. 3.3	I	1.9	SSE
	AP/CF-12	N. Hinsdale, NH	I	3.6	NNW
	AP/CF-13	Hinsdale Substation	I	3.1	E
	AP/CF-14	Northfield, MA	I	11.6	SSE
	AP/CF-15	Tyler Hill Road	I	3.1	WNW
	AP/CF-21	Spofford Lake	C	16.4	NNE
	AP/CF-40	Gov. Hunt House	I	--	On-site
<b>2. Waterborne</b>					
<b>a. Surface</b>					
	WR-11	River Sta. No. 3.3	I	1.9	SSE
	WR-21	Rt.9 Bridge	C	11.8	NNW
<b>b. Ground</b>					
	WG-11	Plant Well	I	0.2	On-site
	WG-12	Vernon Nursing Well	I	2.1	SSE
	WG-14	Plant Support Bldg (PSB) Well	I	0.3	On-site
	WG-15	Southwest Well	I	0.3	On-site
	WT-14	Test Well 201	I	--	On-site
	WT-16	Test Well 202	I	--	On-site
	WT-17	Test Well 203	I	--	On-site
	WT-18	Test Well 204	I	--	On-site
	WG-22	Copeland Well	C	13.7	N
<b>c. Sediment</b>					
	SE-11	Shoreline Downriver	I	0.6	SSE
	SE-12	North Storm Drain Outfall	I	0.1	E

**TABLE 4.2, cont.**

**RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2011  
VERMONT YANKEE NUCLEAR POWER STATION**

Direction Exposure Pathway Stack	Station Code	Station Description	Zone <sup>(a)</sup>	Distance	
				From Plant Stack(km)	From Plant
<b>3. Ingestion</b>					
a. Milk	TM-11	Miller Farm	I	0.8	W
	TM-14	Brown Farm	I	2.2	S
	TM-18	Blodgett Farm	I	3.6	SE
	TM-20	Dunklee Farm (Vern-Mont)	C	5.5	S
	TM-22	Franklin Farm	C	9.7	WSW
	TM-24	County Farm <sup>(c)</sup>	C	21.6	N
b. Fish	FH-11	Vernon Pond	I	0.6 <sup>(b)</sup>	SSE
	FH-21	Rt.9 Bridge	C	11.8	NNW
c. Mixed Grass	TG-11	River Sta. No. 3.3	I	1.9	SSE
	TG-12	N. Hinsdale, NH	I	3.6	NNW
	TG-13	Hinsdale Substation	I	3.1	E
	TG-14	Northfield, MA	I	11.6	SSE
	TG-15	Tyler Hill Rd.	I	3.1	WNW
	TG-21	Spofford Lake	C	16.4	NNE
	TG-40	Gov. Hunt House	I	--	On-site
d. Silage	TC-11	Miller Farm	I	0.8	W
	TC-14	Brown Farm	I	2.2	S
	TC-18	Blodgett Farm	I	3.6	SE
	TC-20	Dunklee Farm (Vern-Mont)	C	5.2	S
	TC-22	Franklin Farm	C	9.7	WSW

(a) I = Indicator Stations; C = Control Stations

(b) Fish samples are collected anywhere in Vernon Pond, which is adjacent to the plant (see Figure 4.1).

(c) County Farm ceased operations on May 4, 2011.

**TABLE 4.3**

**RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2011  
VERMONT YANKEE NUCLEAR POWER STATION**

Station Code	Station Description	Zone <sup>(a)</sup>	Distance From Plant (km) <sup>(d)</sup>	Direction From Plant <sup>(d)</sup>
DR-1	River Sta. No. 3.3	I	1.6	SSE
DR-2	N. Hinsdale, NH	I	3.9	NNW
DR-3	Hinsdale Substation	I	3.0	E
DR-4	Northfield, MA	C	11.3	SSE
DR-5	Spofford Lake	C	16.5	NNE
DR-6	Vernon School	I	0.52	WSW
DR-7	Site Boundary <sup>(c)</sup>	SB	0.28	W
DR-8	Site Boundary	SB	0.25	SSW
DR-9	Inner Ring	I	1.7	N
DR-10	Outer Ring	O	4.5	N
DR-11	Inner Ring	I	1.6	NNE
DR-12	Outer Ring	O	3.6	NNE
DR-13	Inner Ring	I	1.2	NE
DR-14	Outer Ring	O	3.9	NE
DR-15	Inner Ring	I	1.5	ENE
DR-16	Outer Ring	O	2.8	ENE
DR-17	Inner Ring	I	1.2	E
DR-18	Outer Ring	O	3.0	E
DR-19	Inner Ring	I	3.7	ESE
DR-20	Outer Ring	O	5.3	ESE
DR-21	Inner Ring	I	1.8	SE
DR-22	Outer Ring	O	3.3	SE
DR-23	Inner Ring	I	2.0	SSE
DR-24	Outer Ring	O	3.9	SSE
DR-25	Inner Ring	I	1.9	S
DR-26	Outer Ring	O	3.8	S
DR-27	Inner Ring	I	1.1	SSW
DR-28	Outer Ring	O	2.2	SSW
DR-29	Inner Ring	I	0.9	SW
DR-30	Outer Ring	O	2.4	SW

TABLE 4.3, cont.

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2011  
VERMONT YANKEE NUCLEAR POWER STATION

Station Code	Station Description	Zone <sup>(a)</sup>	Distance From Plant (km) <sup>(d)</sup>	Direction From Plant <sup>(d)</sup>
DR-31	Inner Ring	I	0.71	WSW
DR-32	Outer Ring	O	5.1	WSW
DR-33	Inner Ring	I	0.66	WNW
DR-34	Outer Ring	O	4.6	W
DR-35	Inner Ring	I	1.3	WNW
DR-36	Outer Ring	O	4.4	WNW
DR-37	Inner Ring	I	2.8	NW
DR-38	Outer Ring	O	7.3	NW
DR-39	Inner Ring	I	3.1	NNW
DR-40	Outer Ring	O	5.0	NNW
DR-41 <sup>(b)</sup>	Site Boundary	SB	0.38	SSW
DR-42 <sup>(b)</sup>	Site Boundary	SB	0.59	S
DR-43 <sup>(b)</sup>	Site Boundary	SB	0.44	SSE
DR-44 <sup>(b)</sup>	Site Boundary	SB	0.19	SE
DR-45 <sup>(b)</sup>	Site Boundary	SB	0.12	NE
DR-46 <sup>(b)</sup>	Site Boundary	SB	0.28	NNW
DR-47 <sup>(b)</sup>	Site Boundary	SB	0.50	NNW
DR-48 <sup>(b)</sup>	Site Boundary	SB	0.82	NW
DR-49 <sup>(b)</sup>	Site Boundary	SB	0.55	WNW
DR-50 <sup>(b)</sup>	Gov. Hunt House	I	0.35	SSW
DR-51 <sup>(b)</sup>	Site Boundary	SB	0.26	W
DR-52 <sup>(b)</sup>	Site Boundary	SB	0.24	SW
DR-53 <sup>(b)</sup>	Site Boundary	SB	0.21	WSW

(a) I = Inner Ring TLD; O = Outer Ring Incident Response TLD; C = Control TLD; SB = Site Boundary TLD.

(b) This location is not considered a requirement of ODCM Table 3.5.1.

(c) DR-7 satisfies ODCM Table 3.5.1 for an inner ring direct radiation monitoring location. However, it is averaged as a Site Boundary TLD due to its close proximity to the plant.

(d) Distance and direction is relative to the center of the Turbine Building for direct radiation monitors.

**TABLE 4.4  
ENVIRONMENTAL LOWER LIMIT OF DETECTION (LLD) SENSITIVITY REQUIREMENTS**

Analysis	Water (pCi/l)	Airborne Particulates or Gases (pCi/m <sup>3</sup> )	Fish (pCi/Kg)	Milk (pCi/l)	Vegetation (pCi/Kg)	Sediment (pCi/Kg - dry)
Gross-Beta	4	0.01				
H-3	2000*					
Mn-54	15		130			
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131		0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

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

See ODCM Table 4.5.1 for additional explanatory footnotes.

**TABLE 4.5**

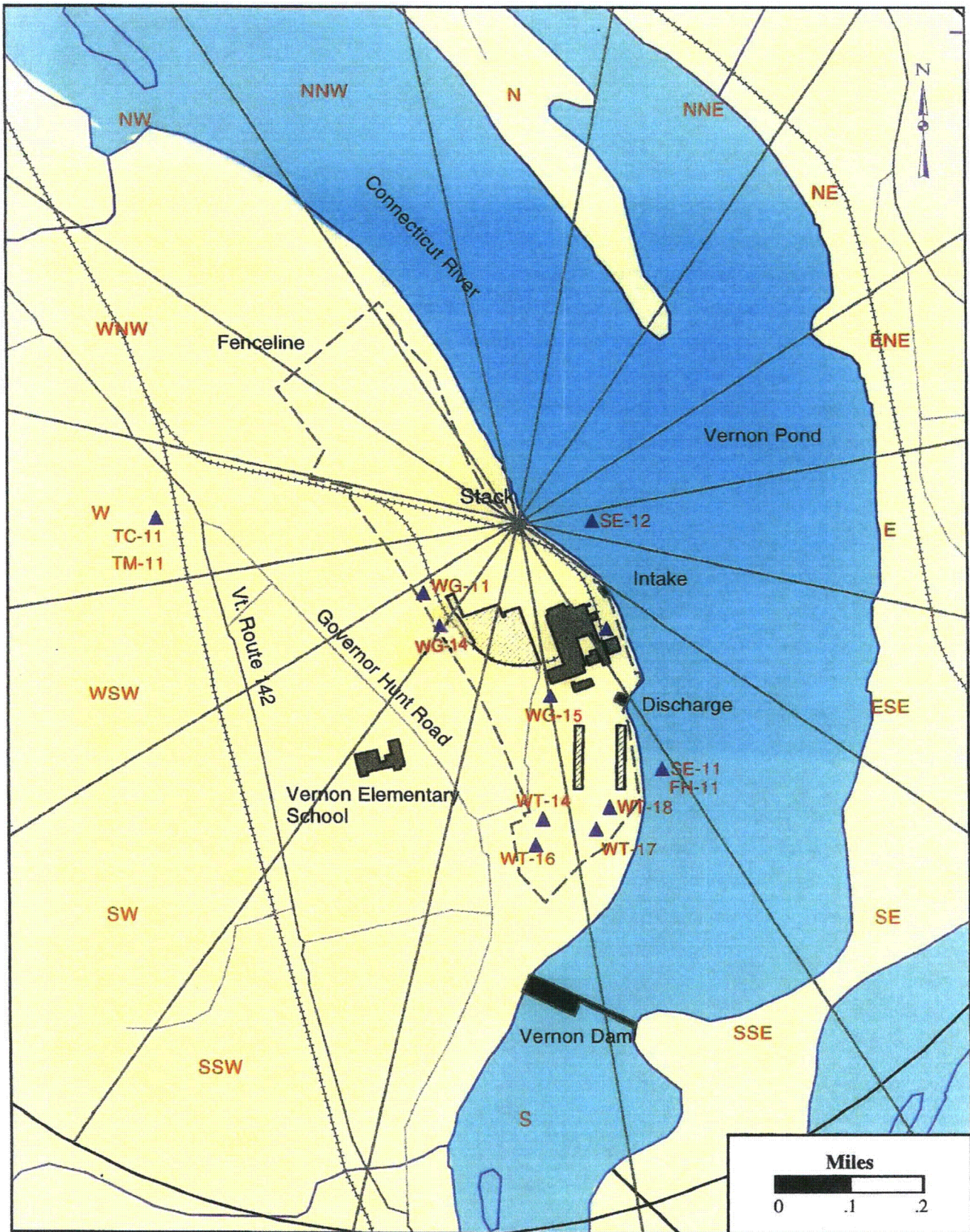
**REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS  
IN ENVIRONMENTAL SAMPLES**

Analysis	Water (pCi/l)	Airborne Particulates or Gases (pCi/m <sup>3</sup> )	Fish (pCi/Kg)	Milk (pCi/l)	Food Product (pCi/Kg)	Sediment (pCi/Kg-dry)
H-3	20,000 <sup>(a)</sup>					
Mn-54	1000		30,000			
Fe-59	400		10,000			
Co-58	1000		30,000			
Co-60	300		10,000			3000 <sup>(b)</sup>
Zn-65	300		20,000			
Zr-Nb-95	400					
I-131		0.9		3	100	
Cs-134	30	10	1000	60	1000	
Cs-137	50	20	2000	70	2000	
Ba-La-140	200			300		

(a) Reporting Level for drinking water pathways. For non-drinking water, a value of 30,000 pCi/liter may be used.

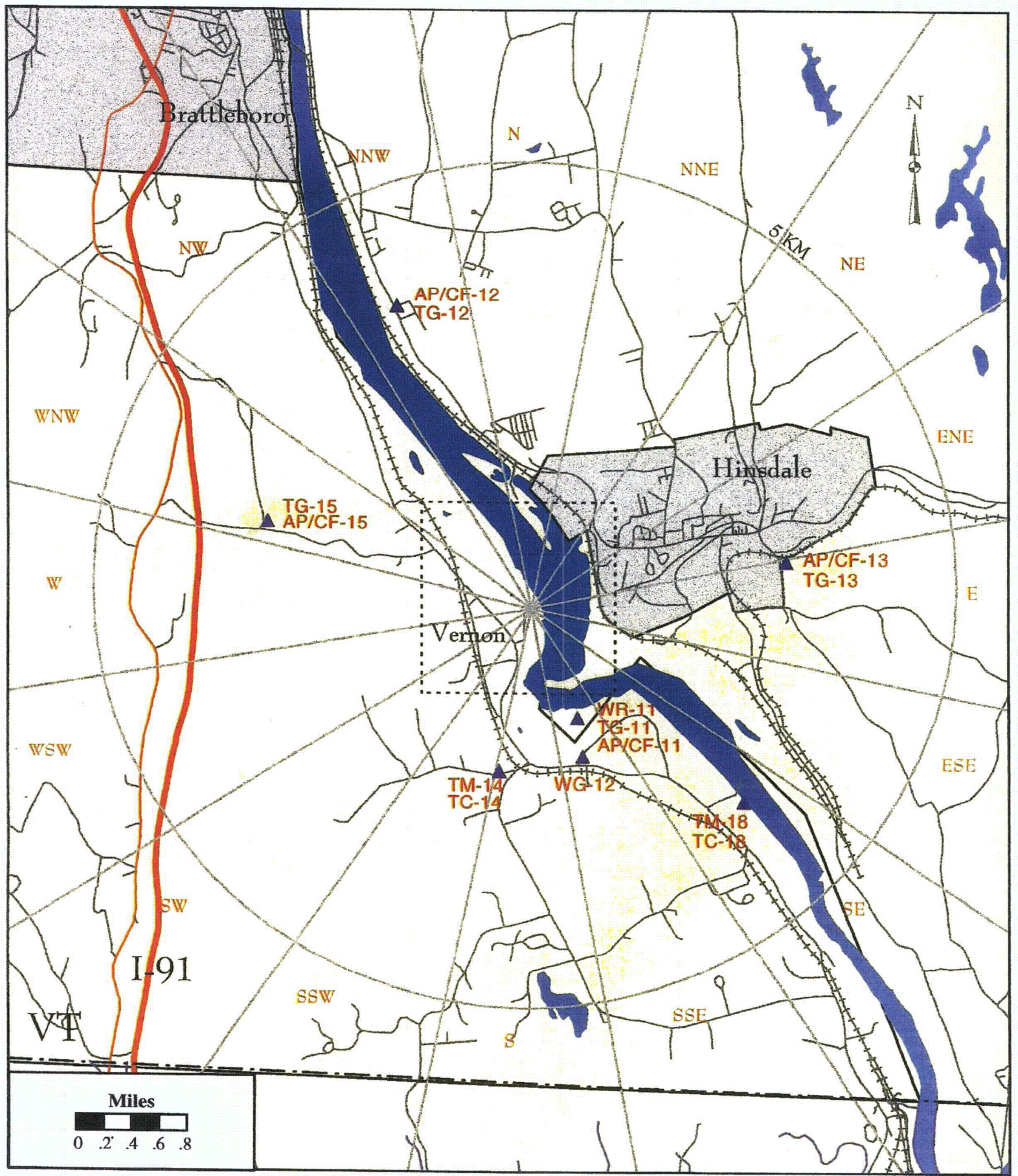
(b) Reporting Level for grab samples taken at the North Storm Drain Outfall only.

See ODCM Table 3.5.2 for additional explanatory footnotes.

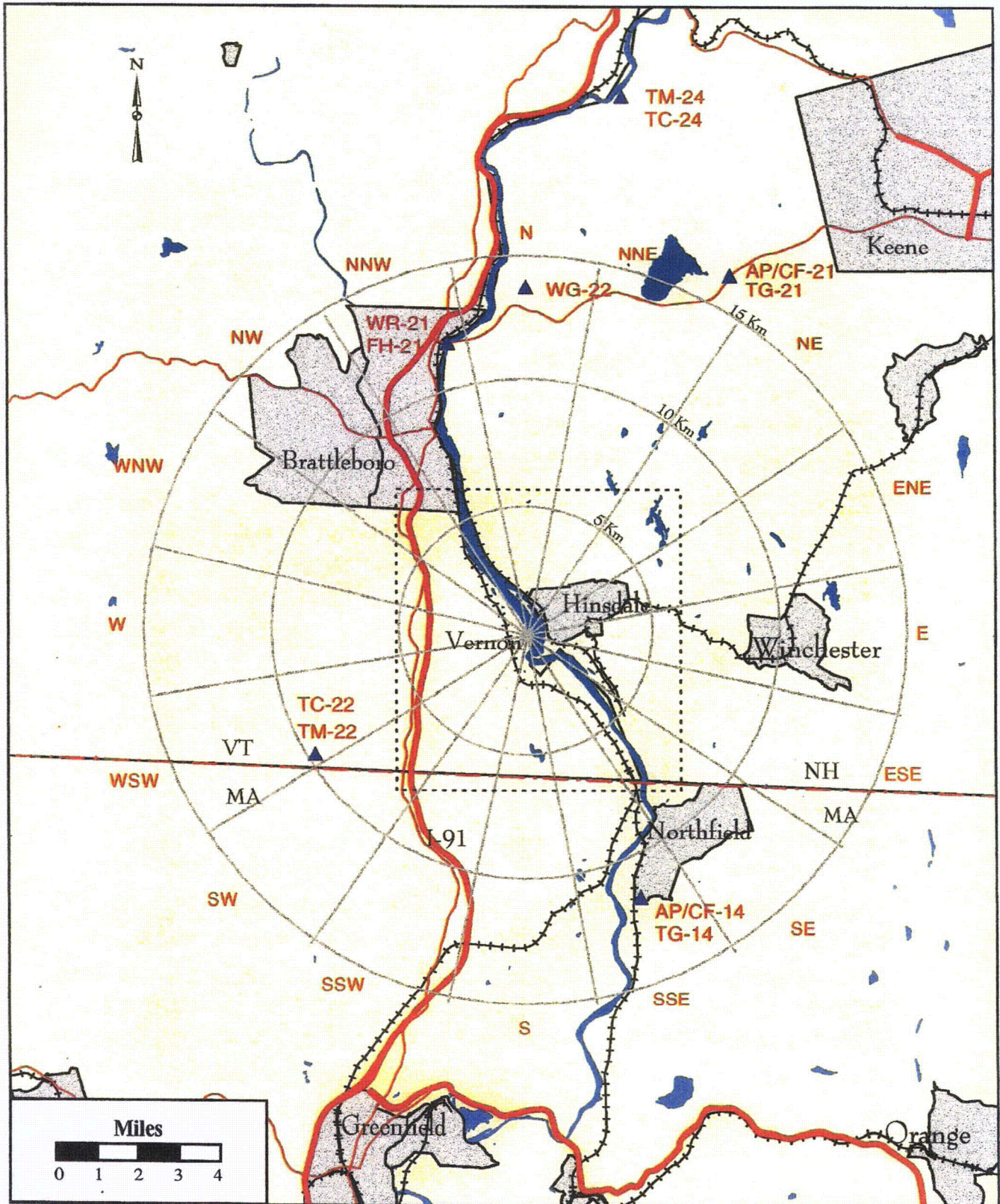


**Figure 4.1 Environmental Sampling Locations  
In Close Proximity to Plant**

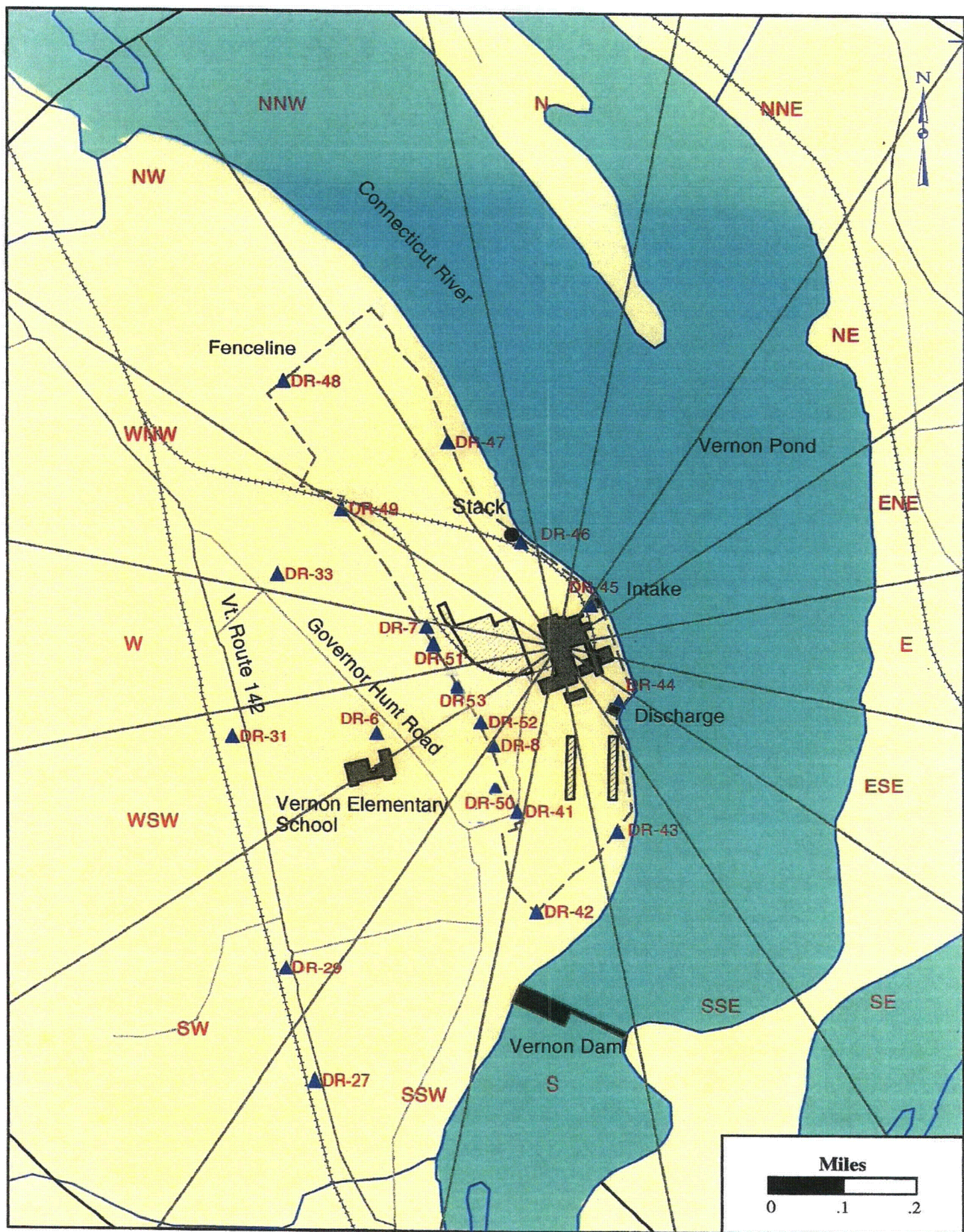




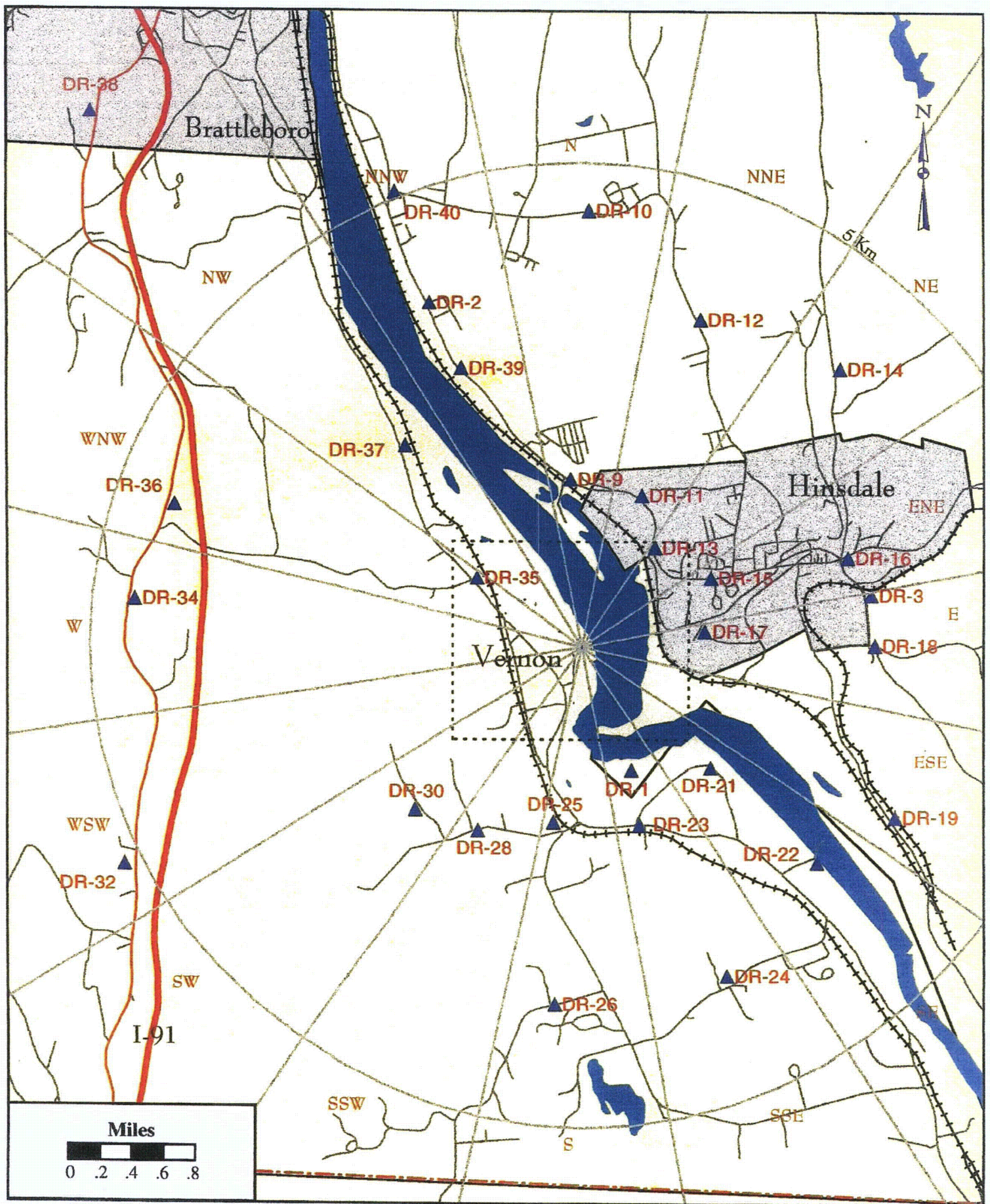
**Figure 4.2 Environmental Sampling Locations Within 5 Km of Plant**



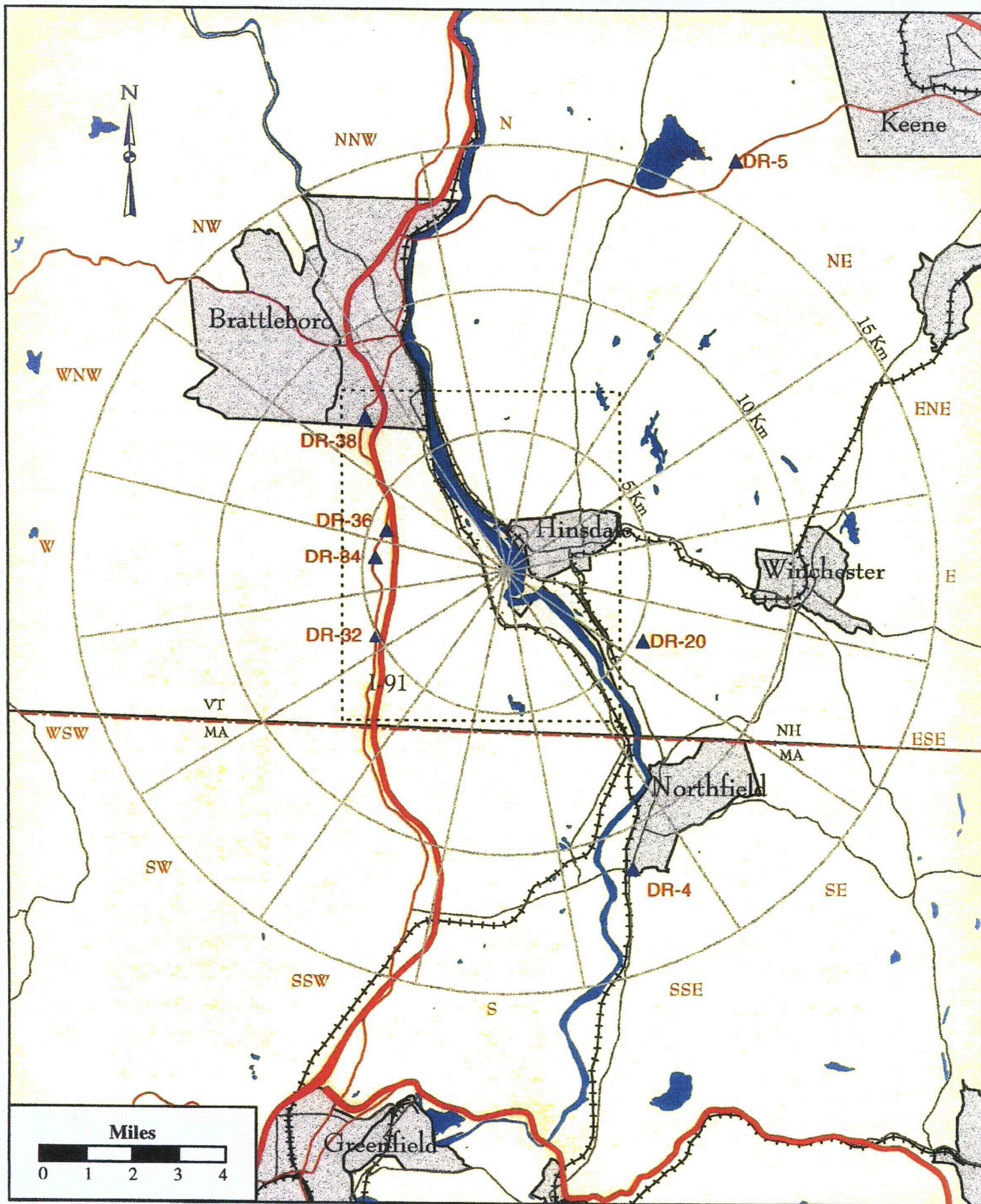
**Figure 4.3 Environmental Sampling Locations Greater than 5 Km from Plant**



**Figure 4.4 Thermoluminescent Dosimeter Locations  
In Close Proximity to Plant**



**Figure 4.5 Thermoluminescent Dosimeter Locations Within 5 Km of Plant**



**Figure 4.6 Thermoluminescent Dosimeter Locations Greater than 5 Km from Plant**

## 5. RADIOLOGICAL DATA SUMMARY TABLES

This section summarizes the analytical results of the environmental samples that were collected during 2011. These results, shown in Table 5.1, are presented in a format similar to that prescribed in the NRC's Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 1). The results are ordered by sample media type and then by radionuclide. The units for each media type are also given.

In 2011, Vermont Yankee contracted with one laboratory for primary analyses of the environmental samples. A second laboratory was used to cross-check the first laboratory for selected samples and to analyze other samples for hard-to-detect radionuclides (such as Strontium-89 and 90).

The left-most column of Table 5.1 contains the radionuclide of interest, the total number of analyses for that radionuclide in 2011 and the number of measurements which exceeded the Reporting Levels found in Table 3.5.2 of the VYNPS Off-site Dose Calculation Manual. The latter are classified as "Non-routine" measurements. The second column lists the required Lower Limit of Detection (LLD) for those radionuclides that have detection capability requirements as specified in the ODCM Table 4.5.1. The absence of a value in this column indicates that no LLD is specified in the ODCM for that radionuclide in that media. The target LLD for any analysis is typically 50 percent of the most restrictive required LLD. Occasionally the required LLD may not be met. This may be due to malfunctions in sampling equipment or lack of sufficient sample quantity which would then result in low sample volume. Delays in analysis at the laboratory could also be a factor. Such cases, if and when they should occur, would be addressed in Section 6.2.

For each radionuclide and media type, the remaining three columns summarize the data for the following categories of monitoring locations: (1) the Indicator stations, which are within the range of influence of the plant and which could be affected by its operation; (2) the Control stations, which are beyond the influence of the plant; and (3) the station which had the highest mean concentration during 2011 for that radionuclide. Direct radiation monitoring stations (using TLDs) are grouped into Inner Ring, Outer ring, Site Boundary and Control.

In each of these columns, for each radionuclide, the following statistical values are given:

- The mean value of all concentrations, including those results that are less than the *a posteriori* LLD for that analysis.
- The minimum and maximum concentration, including those results that are less than the *a posteriori* LLD. In previous years, data less than the *a posteriori* LLD were converted to zero for purposes of

reporting the means and ranges.

- The “Number Detected” is the number of positive measurements. A measurement is considered positive when the concentration is greater than three times the standard deviation in the concentration and greater than or equal to the *a posteriori* LLD (Minimum Detectable Concentration or MDC).
- The “Total Analyzed” for each column is also given.

Each single radioactivity measurement datum in this report is based on a single measurement of a sample. Any concentration below the *a posteriori* LLD for its analysis is averaged with those values above the *a posteriori* LLD to determine the average of the results. Likewise, the values are reported in ranges even though they are below the *a posteriori* LLD. To be consistent with normal data review practices used by Vermont Yankee, a “positive measurement” is considered to be one whose concentration is greater than three times its associated standard deviation, is greater than or equal to the *a posteriori* LLD and satisfies the analytical laboratory’s criteria for identification.

The radionuclides reported in this section represent those that: 1) had an LLD requirement in Table 4.5.1 of the ODCM, or a Reporting Level listed in Table 3.5.2 of the ODCM, or 2) had a positive measurement of radioactivity, whether it was naturally-occurring or man-made; or 3) were of special interest for any other reason. The radionuclides routinely analyzed and reported by the environmental laboratory (in a gamma spectroscopy analysis) were: Th-232, Ba/La-140, Be-7, Co-58, Co-60, Cs-134, Cs-137, Fe-59, K-40, Mn-54, Zn-65 and Zr-95.

Data from direct radiation measurements made by TLDs are provided in Table 5.2. The complete listing of quarterly TLD data is provided in Table 5.3.

Radiological Environmental Program Summary  
**2011 Radiological Environmental Operating Report**  
Vermont Yankee

**Table 5.1:**

Sample Medium:	Air Particulate (AP)
Sample Medium:	Charcoal Cartridge (CF)
Sample Medium:	River Water (WR)
Sample Medium:	Ground Water (WG)
Sample Medium:	Sediment (SE)
Sample Medium:	Test Well (WT)
Sample Medium:	Milk (TM)
Sample Medium:	Silage (TC)
Sample Medium:	Mixed Grass (TG)
Sample Medium:	Fish (FH)



**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2011		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
AIR PARTICULATES (PCI/CU. METERS)	GR-B	362	0.01	0.0128 (310/310) (0.002/0.057)	0.0120 (52/52) (0.002/0.041)	0.0137 (52/52) (0.002/0.043)	12 INDICATOR N. HINSDALE, NH 3.6 KILOMETERS NNW OF SITE	0
	GAMMA BE-7	28	N/A	0.0923 (24/24) (0.0549/0.1473)	0.1067 (4/4) (0.0896/0.1189)	0.1067 (4/4) (0.0896/0.1189)	21 CONTROL SPOFFORD LAKE 16.4 KILOMETERS NNE OF SITE	0
	K-40		N/A	0.0283 (3/24) (<0.0089/0.0524)	0.0269 (0/4) (<0.0207/<0.0362)	0.0320 (1/4) (<0.0233/0.0524)	15 INDICATOR TYLER HILL ROAD 3.1 KILOMETERS WNW OF SITE	0
	CS-134		30	0.0028 (0/24) (<0.0019/<0.0047)	0.0029 (0/4) (<0.0023/<0.0039)	0.0036 (0/4) (<0.0028/<0.0047)	14 INDICATOR NORTHFIELD, MA 11.6 KILOMETERS SSE OF SITE	0
	CS-137		0.06	0.0019 (0/24) (<0.0011/<0.0029)	0.0017 (0/4) (<0.0005/<0.0022)	0.0024 (0/4) (<0.0022/<0.0026)	40 INDICATOR GOV. HUNT HOUSE ON SITE	0
	RA-226		N/A	0.0271 (0/24) (<0.0141/<0.0369)	0.0286 (0/4) (<0.0205/<0.0383)	0.0302 (0/4) (<0.0181/<0.0369)	14 INDICATOR NORTHFIELD, MA 11.6 KILOMETERS SSE OF SITE	0
	ACTH-228		N/A	0.0075 (0/24) (<0.0018/<0.0129)	0.0060 (0/4) (<0.0026/<0.0083)	0.0090 (0/4) (<0.0052/<0.0129)	12 INDICATOR N. HINSDALE, NH 3.6 KILOMETERS NNW OF SITE	0
AIR IODINE (PCI/ M3)	GAMMA I-131 *	361	40	0.0311 (10/309) (<0.0061/0.1090)	0.0335 (2/52) (<0.0182/0.0830)	0.0335 (2/52) (<0.0182/0.0830)	21 CONTROL SPOFFORD LAKE 16.4 KILOMETERS NNE OF SITE	0

\* Positive I-131 is attributed to the Fukushima incident.

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271		REPORTING PERIOD: 2011		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN		
				LOCATIONS	LOCATION	MEAN (F)	STATION # NAME	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
				MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	DISTANCE AND DIRECTION	
RIVER WATER (PCI/LITER)	GR-B	24	4	2.36 (12/12) (0.860/7.00)	1.32 (11/12) (0.700/3.10)	2.36 (12/12) (0.860/7.00)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0
	H-3	8	3000	420 (0/4) (<408/<433)	420 (0/4) (<408/<433)	420 (0/4) (<408/<433)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0
Stations 11 and 21 have the same average, minimum and maximum values.								
	GAMMA MN-54	24	15	2.27 (0/12) (<1.53/<3.04)	3.97 (0/12) (<2.87/<4.83)	3.97 (0/12) (<2.87/<4.83)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	CO-58		7.5	2.62 (0/12) (<1.75/<3.76)	4.25 (0/12) (<2.52/<5.09)	4.25 (0/12) (<2.52/<5.09)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	FE-59		30	7.39 (0/12) (<5.44/<9.58)	11.9 (0/12) (<6.95/<17.1)	11.9 (0/12) (<6.95/<17.1)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	CO-60		15	2.35 (0/12) (<1.5/<3.08)	4.53 (0/12) (<2.8/<7.12)	4.53 (0/12) (<2.8/<7.12)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	ZN-65		30	4.46 (0/12) (<1.94/<6.50)	9.77 (0/12) (<5.46/<13.7)	9.77 (0/12) (<5.46/<13.7)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	ZR-95		15	4.47 (0/12) (<3.37/<5.48)	7.48 (0/12) (<4.56/<10.6)	7.48 (0/12) (<4.56/<10.6)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT			DOCKET NUMBER: 50-271			REPORTING PERIOD: 2011		
Location of Facility: VERNON, VT			INDICATOR CONTROL			LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
RIVER WATER (PCI/LITER)	I-131		15	10.1 (0/12) (<4.95/<14.9)	7.79 (0/12) (<4.29/<12.5)	10.1 (0/12) (<4.95/<14.9)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0
	CS-134		15	1.78 (0/12) (<1.01/<2.59)	4.35 (0/12) (<1.95/<6.42)	4.35 (0/12) (<1.95/<6.42)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	CS-137		15	2.29 (0/12) (<1.33/<3.42)	4.26 (0/12) (<2.62/<5.5)	4.26 (0/12) (<2.62/<5.5)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	RA-226		N/A	87.5 (11/12) (60.9/135)	104 (6/12) (76.3/139)	104 (6/12) (76.3/139)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	BA-LA-140		15	8.07 (0/12) (<5.08/<11.0)	7.18 (0/12) (<4.23/<9.67)	8.07 (0/12) (<5.08/<11.0)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0
GROUND WATER (PCI/LITER)	GR-B	17	2	4.35 (13/13) (1.78/9.59)	1.21 (3/4) (<0.870/1.50)	9.59 (1/1) N/A	15 INDICATOR SOUTHWEST WELL 0.1 KILOMETERS ON SITE	0
	H-3	28	1500	441 (0/24) (<379/<525)	417 (0/4) (<410/<423)	465 (0/12) (<379/<525)	15 INDICATOR SOUTHWEST WELL 0.1 KILOMETERS ON SITE	0
	I-131	17	1	0.590 (0/13) (<0.446/<0.830)	0.682 (0/4) (<0.512/<0.891)	0.682 (0/4) (<0.512/<0.891)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT			DOCKET NUMBER: 50-271			REPORTING PERIOD: 2011		
Location of Facility: VERNON, VT			INDICATOR CONTROL			LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
GROUND WATER (PCI/LITER)	GAMMA MN-54	28	7.5	3.83 (0/24) (<1.03/<9.31)	5.93 (0/4) (<2.54/<8.90)	5.93 (0/4) (<2.54/<8.90)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0
	CO-58		7.5	3.75 (0/24) (<1.17/<7.38)	6.00 (0/4) (<2.78/<8.87)	6.00 (0/4) (<2.78/<8.87)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0
	FE-59		15	10.4 (0/24) (<2.33/<24.6)	16.2 (0/4) (<6.20/<26.0)	16.2 (0/4) (<6.20/<26.0)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0
	CO-60		7.5	4.12 (0/24) (<0.910/<9.10)	6.08 (0/4) (<2.50/<9.70)	6.13 (0/4) (<2.13/<9.10)	14 INDICATOR PSB WELL 0.3 KILOMETERS ON SITE	0
	ZN-65		15	6.92 (0/24) (<1.87/<13.0)	9.46 (0/4) (<5.39/<13.7)	9.46 (0/4) (<5.39/<13.7)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0
	ZR-95		15	7.54 (0/24) (<2.26/<14.7)	9.49 (0/4) (<4.62/<13.1)	10.4 (0/4) (<4.06/<14.7)	14 INDICATOR PSB WELL 0.3 KILOMETERS ON SITE	0
	CS-134		7.5	3.83 (0/24) (<0.967/<9.47)	4.09 (0/4) (<2.42/<5.77)	5.35 (0/4) (<2.03/<9.47)	14 INDICATOR PSB WELL 0.3 KILOMETERS ON SITE	0
	CS-137		9	3.61 (0/24) (<1.04/<5.28)	5.92 (0/4) (<2.54/<9.35)	5.92 (0/4) (<2.54/<9.35)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT			DOCKET NUMBER: 50-271			REPORTING PERIOD: 2011		
Location of Facility: VERNON, VT			INDICATOR CONTROL			LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
GROUND WATER (PCI/LITER)	BA-LA-140		7.5	9.28 (0/24) (<5.21/<34.2)	9.63 (0/4) (<5.46/<14.8)	9.63 (0/4) (<5.46/<14.8)	22 CONTROL COPELAND WELL 13.7 KILOMETERS N OF SITE	0
	RA-226		2	38.7 (2/24) (<0.099/<131)	0.160 (1/4) (0.087/<0.232)	77.2 (0/12) (<25.1/<131)	15 INDICATOR SOUTHWEST WELL 0.1 KILOMETERS ON SITE	0
SEDIMENT (PCI/KG WET)	GAMMA BE-7	36	N/A	1114 (3/34) (<410/2770)	1011 (0/2) (<882/<1140)	1995 (2/2) (1220/2770)	17 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	K-40		N/A	20671 (34/34) (9930/31600)	13850 (2/2) (13200/14500)	26150 (2/2) (23300/29000)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	MN-54		N/A	77.6 (0/34) (<37.1/<128)	69.0 (0/2) (<62.0/<76.0)	103 (0/2) (<78.8/<128)	19 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	CO-60		N/A	73.7 (1/36) (<32.3/151)	56.2 (0/2) (<44.3/<68.1)	113 (1/2) (<74.5/151)	13 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	NB-95		N/A	125 (0/36) (<50.2/<176)	116 (0/2) (<103/<129)	153 (0/2) (<141/<164)	23 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	CS-134		150	61.4 (0/36) (<28.2/<74.2)	57.2 (0/2) (<54.8/<59.6)	71.4 (0/2) (<68.9/<73.8)	22 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT			DOCKET NUMBER: 50-271		REPORTING PERIOD: 2011			
Location of Facility: VERNON, VT			INDICATOR LOCATIONS		CONTROL LOCATION	LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
SEDIMENT (PCI/KG WET)	CS-137		180	132 (24/36) (<59.3/232)	70.5 (0/2) (<60.8/<80.1)	203 (2/2) (178/228)	19 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	BA-LA-140		N/A	1066 (0/36) (<249/<2300)	1027 (0/2) (<514/<1540)	1395 (0/2) (<490/<2300)	18 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	RA-226		N/A	2570 (28/36) (<1130/3680)	1520 (1/2) (<1280/1730)	3400 (2/2) (3290/3510)	13 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	AC-228		N/A	2275 (29/36) (<216/4560)	1845 (2/2) (1600/2090)	3515 (2/2) (3090/3940)	31 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	TH-228		N/A	1599 (36/36) (798/2100)	987 (2/2) (984/990)	1960 (2/2) (1950/1970)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	TH-232		N/A	1376 (36/36) (694/1870)	763 (2/2) (712/814)	1725 (2/2) (1580/1870)	25 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
	U-238		N/A	7578 (0/36) (<4050/<11100)	6595 (0/2) (<6500/<6690)	9395 (0/2) (<9130/<9660)	23 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 KILOMETER E OF SITE	0
TEST WELLS (PCI/LITER)	GR-B	20	4	9.91 (20/20) (5.12/22.5)	N/A	16.2 (5/5) (12.0/22.5)	14 INDICATOR TEST WELL 201 ON SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2011		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
TEST WELLS (PCI/LITER)	H-3	20	3000	473 (0/20) (<425/<549)	N/A	481 (0/5) (<444/<540)	18 INDICATOR TEST WELL 204 ON SITE	0
	GAMMA K-40	20	N/A	29.1 (4/20) (<7.97/<72.2)	N/A	35.6 (3/5) (<8.63/45.0)	18 INDICATOR TEST WELL 204 ON SITE	0
	MN-54		15	1.61 (0/20) (<0.886/<3.97)	N/A	1.74 (0/5) (<0.987/<3.97)	18 INDICATOR TEST WELL 204 ON SITE	0
	CO-58		15	1.77 (0/20) (<1.15/<3.69)	N/A	1.90 (0/5) (<1.24/<3.69)	18 INDICATOR TEST WELL 204 ON SITE	0
	FE-59		30	4.14 (0/20) (<2.44/<7.73)	N/A	4.46 (0/5) (<2.89/<7.73)	18 INDICATOR TEST WELL 204 ON SITE	0
	CO-60		15	1.58 (0/20) (<0.839/<4.46)	N/A	1.76 (0/5) (<0.839/<4.46)	14 INDICATOR TEST WELL 201 ON SITE	0
	NB-95		15	2.02 (0/20) (<1.11/<4.39)	N/A	2.19 (0/5) (<1.38/<4.35)	18 INDICATOR TEST WELL 204 ON SITE	0
	I-131		15	16.2 (0/20) (<3.46/<69.8)	N/A	18.0 (0/5) (<4.02/<69.8)	14 INDICATOR TEST WELL 201 ON SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT				DOCKET NUMBER:		50-271		
Location of Facility: VERNON, VT				REPORTING PERIOD:		2011		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR	CONTROL	LOCATION WITH HIGHEST ANNUAL MEAN		
				LOCATIONS	LOCATION	MEAN	STATION #	NUMBER OF
				MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	NAME DISTANCE AND DIRECTION	REPORTED MEASUREMENTS
TEST WELLS (PCI/LITER)	CS-134		15	1.49 (0/20) (<0.790/<3.81)	N/A	1.62 (0/5) (<0.881/<3.81)	18 INDICATOR TEST WELL 204 ON SITE	0
	CS-137		18	1.67 (0/20) (<0.966/<4.01)	N/A	1.73 (0/5) (<1.01/<4.00)	18 INDICATOR TEST WELL 204 ON SITE	0
	BA-LA-140		15	7.37 (0/20) (<3.01/<14.9)	N/A	7.52 (0/5) (<3.36/<14.8)	14 INDICATOR TEST WELL 201 ON SITE	0
MILK (PCI/LITER)	I-131 *	95	1	0.566 (3/54) (0.410/<0.972)	0.635 (2/41) (0.426/<0.967)	0.720 (1/5) (0.581/<0.967)	24 CONTROL COUNTY FARM 21.6 KILOMETERS N OF SITE	0
	SR-89	22	10	5.13 (0/12) (<3.31/<6.57)	5.19 (0/10) (<3.37/<6.31)	5.58 (0/2) (<5.58/<5.58)	24 CONTROL COUNTY FARM 21.6 KILOMETERS N OF SITE	0
	SR-90	22	2	0.940 (2/12) (<0.723/1.28)	1.31 (4/10) (<0.642/2.71)	1.86 (4/4) (0.846/2.71)	22 CONTROL FRANKLIN FARM 9.7 KILOMETERS WSW OF SITE	0
	GAMMA BE-7	95	N/A	50.7 (0/54) (<38.1/<69.5)	54.0 (0/41) (<38.8/<81.2)	55.6 (0/18) (<42.5/<71.9)	20 CONTROL DUNKLEE FARM 5.5 KILOMETERS S OF SITE	0
	K-40		N/A	1477 (54/54) (1256/1768)	1597 (41/41) (1361/1853)	1630 (18/18) (1486/1853)	20 CONTROL DUNKLEE FARM 5.5 KILOMETERS S OF SITE	0

\* Positive I-131 is attributed to the Fukushima incident.



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THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2011		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
MILK (PCI/LITER)	CS-134		15	6.03 (0/54) (<3.51/<9.88)	6.62 (0/41) (<3.70/<10.6)	7.44 (0/18) (<4.51/<9.99)	20 CONTROL DUNKLEE FARM 5.5 KILOMETERS S OF SITE	0
	CS-137		18	6.44 (0/54) (<4.25/<9.29)	7.02 (0/41) (<4.67/<10.0)	7.44 (0/5) (<6.10/<9.01)	24 CONTROL COUNTY FARM 21.6 KILOMETERS N OF SITE	0
	RA-226		N/A	.140 (14/54) (64.9/<207)	158 (11/41) (98.6/266)	162 (3/18) (125/<207)	18 INDICATOR BLODGETT FARM 3.6 KILOMETERS SE OF SITE	0
	BA-LA-140		N/A	7.61 (0/54) (<4.65/<12.3)	8.45 (0/41) (<4.63/<13.2)	9.38 (0/5) (<6.16/<13.2)	24 CONTROL COUNTY FARM 21.6 KILOMETERS N OF SITE	0
SILAGE (PCI/KG)	I-131	5	N/A	22.4 (0/3) (<16.5/<32.9)	38.8 (0/2) (<20.6/<57.0)	57.0 (0/1) N/A	22 CONTROL FRANKLIN FARM 9.7 KILOMETERS WSW OF SITE	0
	GAMMA BE-7	5	N/A	582 (2/3) (126/1310)	478.0 (1/2) (<193/762)	1310 (1/1) N/A	14 INDICATOR BROWN FARM 2.2 KILOMETERS S OF SITE	0
	K-40		N/A	3917 (3/3) (2437/5739)	13130 (2/2) (4119/22140)	22140 (1/1) N/A	22 CONTROL FRANKLIN FARM 9.7 KILOMETERS WSW OF SITE	0
	CS-134		N/A	30.0 (0/3) (<22.1/<45.0)	31.9 (0/2) (<19.1/<44.6)	45.0 (0/1) N/A	11 INDICATOR MILLER FARM 0.8 KILOMETERS W OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT			DOCKET NUMBER: 50-271			REPORTING PERIOD: 2011		
Location of Facility: VERNON, VT			INDICATOR CONTROL			LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	MEAN (F) RANGE	MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
SILAGE (PCI/KG)	CS-137		N/A	24.2 (0/3) (<17.5/<33.0)	44.6 (0/2) (<22.7/<66.5)	66.5 (0/1) N/A	22 CONTROL FRANKLIN FARM 9.7 KILOMETERS WSW OF SITE	0
	ACTH-228		N/A	103 (0/3) (<71.9/<151)	156 (0/2) (<74.4/<238)	238 (0/1) N/A	22 CONTROL FRANKLIN FARM 9.7 KILOMETERS WSW OF SITE	0
MIXED GRASS (PCI/KG)	I-131	21	N/A	44.4 (0/18) (<28.8/<59.1)	49.2 (0/3) (<44.7/<52.7)	55.2 (0/3) (<50.4/<59.1)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0
	GAMMA BE-7	21	N/A	1915 (15/18) (<287/8878)	3389 (2/3) (<322/8524)	3411 (3/3) (564/8878)	15 INDICATOR TYLER HILL RD. 3.1 KILOMETERS WNW OF SITE	0
	K-40		N/A	7056 (18/18) (4008/10500)	6830 (3/3) (4756/8290)	8629 (3/3) (6552/10500)	14 INDICATOR NORTHFIELD, MA 11.6 KILOMETERS SSE OF SITE	0
	CS-134		30	45.3 (0/18) (<31.3/<58.7)	46.6 (0/3) (<40.6/<51.9)	50.6 (0/3) (<43.8/<57.7)	40 INDICATOR GOV. HUNT HOUSE ON SITE	0
	CS-137		40	44.2 (0/18) (<32.0/<57.6)	48.1 (0/3) (<35.1/<68.1)	50.8 (0/3) (<48.3/<53.7)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0
	RA-226		N/A	781 (8/18) (564/1034)	867 (1/3) (608/<1040)	913 (1/3) (833/<960)	11 INDICATOR RIVER STA. NO. 3.3 1.9 KILOMETERS SSE OF SITE	0

**TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR  
THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2011		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
MIXED GRASS (PCI/KG)	ACTH-228		N/A	152 (0/18) (<101/<189)	195 (0/3) (<184/<206)	195 (0/3) (<184/<206)	21 CONTROL SPOFFORD LAKE 16.4 KILOMETERS NNE OF SITE	0
FISH (PCI/KG)	GAMMA K-40	32	N/A	3093 (16/16) (2140/4292)	3239 (16/16) (1740/4940)	3239 (16/16) (1740/4940)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	MN-54		130	34.7 (0/16) (<16.1/<49.6)	34.2 (0/16) (<15.0/<51.1)	34.7 (0/16) (<16.1/<49.6)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	CO-58		130	44.6 (0/16) (<28.3/<61.9)	44.4 (0/16) (<25.6/<57.9)	44.6 (0/16) (<28.3/<61.9)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	FE-59		260	115 (0/16) (<61.6/<128)	112 (0/16) (<85.8/<130)	115 (0/16) (<61.6/<128)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	CO-60		130	30.3 (0/16) (<13.3/<47.8)	32.5 (0/16) (<12.6/<63.3)	32.5 (0/16) (<12.6/<63.3)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	ZN-65		260	75.0 (0/16) (<36.9/<115)	70.6 (0/16) (<33.7/<107)	75.0 (0/16) (<36.9/<115)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	CS-134		130	38.8 (0/16) (<15.4/<62.8)	33.2 (0/16) (<13.4/<49.7)	38.8 (0/16) (<15.4/<62.8)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0

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Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2011		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
FISH (PCI/KG)	CS-137		150	44.4 (0/16) (<13.9/<74.5)	45.1 (0/16) (<16.4/<70.6)	45.1 (0/16) (<16.4/<70.6)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	TRITIUM	16	N/A	419 (0/8) (<83.8/<696)	411 (0/8) (<84.6/<689)	419 (0/8) (<83.8/<696)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	AM-241	32	N/A	5.16 (0/16) (<1.95/<10.6)	4.57 (0/16) (<0.774/<8.77)	5.16 (0/16) (<1.95/<10.6)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	CM-242	32	N/A	2.82 (0/16) (<0.642/<6.04)	2.65 (0/16) (<0.728/<8.56)	2.82 (0/16) (<0.642/<6.04)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	CM-243/244	32	N/A	4.85 (0/16) (<0.772/<10.8)	5.41 (0/16) (<2.10/<20.2)	5.41 (0/16) (<2.10/<20.2)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	FE-55	32	N/A	1604 (0/16) (<616/<3510)	1758 (0/16) (<427/<4060)	1758 (0/16) (<427/<4060)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	NI-63	32	N/A	196 (0/16) (<110/<331)	192 (0/16) (<102/<306)	196 (0/16) (<110/<331)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	PU-238	32	N/A	7.40 (0/16) (<0.988/<24.1)	13.3 (0/16) (<2.67/<97.5)	13.3 (0/16) (<2.67/<97.5)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0

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THE VERMONT YANKEE NUCLEAR POWER PLANT, 2011**

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT Location of Facility: VERNON, VT				DOCKET NUMBER: 50-271 REPORTING PERIOD: 2011		LOCATION WITH HIGHEST ANNUAL MEAN		
MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR MEAN (F) RANGE	CONTROL MEAN (F) RANGE	MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
FISH (PCI/KG)	PU-239/240	32	N/A	5.18 (0/16) (<1.77/<15.2)	5.70 (0/16) (<2.26/<13.8)	5.70 (0/16) (<2.26/<13.8)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	PU-241	32	N/A	823 (0/16) (<403/<2270)	920 (0/16) (<488/<2230)	920 (0/16) (<488/<2230)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	PU-242	32	N/A	3.11 (0/16) (<0.988/<12.4)	3.33 (0/16) (<1.14/<8.89)	3.33 (0/16) (<1.14/<8.89)	21 CONTROL RT. 9 BRIDGE 11.8 KILOMETERS NNW OF SITE	0
	SR-89	32	N/A	104 (0/16) (<57.6/<182)	101 (0/16) (<63.6/<185)	104 (0/16) (<57.6/<182)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
	SR-90	32	N/A	41.8 (2/16) (<18.8/76.6)	41.4 (6/16) (<22.5/58.4)	41.8 (2/16) (<18.8/76.6)	11 INDICATOR VERNON POND 0.6 KILOMETERS SSE OF SITE	0
DIRECT RADIATION (MILLI-ROENTGEN/QTR.)	TLD-QUARTERLY	212	N/A	7 (204/204) (5/15)	6 (8/8) (5/7)	13 (4/4) (12/15)	DR-45 INDICATOR SITE BOUNDARY 0.12 KILOMETERS NE OF SITE	0

\* REMP samples obtained from this air iodine and milk locations during 2011 identified detectable concentrations of isotopes that could be related to operation of Entergy Vermont Yankee.

Given the following facts, the detectable concentrations are not a result of Entergy Vermont Yankee operation:

- (1) The quantities of radioactive airborne effluents from Entergy Vermont Yankee during 2011 did not increase significantly compared to year 2010.
- (2) Prior REMP sample results have not detected the presence of these isotopes in air and milk samples collected in support of the Entergy Vermont Yankee REMP.
- (3) The concentrations being detected in the indicator samples were also identified in the control samples for from Entergy Vermont Yankee.

As such, the atypical detection of these radionuclides in both indicator and control samples is credibly attributed to the trans-Pacific transport of airborne releases from Dai-Ichi, Fukushima following the March 11, 2011 Tohoku earthquake and is not related to the operations of Entergy Vermont Yankee.

TABLE 5.2

ENVIRONMENTAL TLD DATA SUMMARY  
 VERMONT YANKEE NUCLEAR POWER STATION, VERNON, VT  
 (JANUARY - DECEMBER 2011)

<u>INNER RING TLD</u>	<u>OUTER RING TLD</u>	<u>OFFSITE STATION WITH HIGHEST MEAN</u>	<u>CONTROL TLDs</u>
MEAN* RANGE* (NO. MEASUREMENTS)**	MEAN* RANGE* (NO. MEASUREMENTS)**	STA.NO./ MEAN* RANGE* (NO. MEASUREMENTS)**	MEAN* RANGE* (NO. MEASUREMENTS)**
6.37 ± 0.31 5.32 to 7.87 76	6.45 ± 0.32 4.98 to 7.74 68	DR36 7.42 ± 0.47 7.39 to 8.65 4	6.50 ± 0.29 5.27 to 7.12 8
	<u>SITE BOUNDARY TLD WITH HIGHEST MEAN</u>	<u>SITE BOUNDARY TLD</u>	
	STA.NO./ MEAN* RANGE* (NO. MEASUREMENTS)**	MEAN* RANGE* (NO. MEASUREMENTS)**	
	DR45 13.23 ± 1.32 11.84 to 14.89 4	8.11 ± 0.38 4.82 to 14.89 60	

\* Units are in micro-R per hour.

\*\* Each "measurement" is typically based on quarterly readings from five TLD elements.

TABLE 5.3

## ENVIRONMENTAL TLD MEASUREMENTS

2011

(Micro-R per Hour)

Sta. No.	Description	1ST QUARTER		2ND QUARTER		3RD QUARTER		4TH QUARTER		ANNUAL AVE. EXP.				
		EXP.	S.D.	EXP.	S.D.	EXP.	S.D.	EXP.	S.D.					
DR-01	River Sta. No. 3.3	5.76	+	0.20	6.02	+	0.30	5.82	+	0.23	6.32	+	0.30	6.0
DR-02	N Hinsdale, NH	5.61	+	0.21	6.99	+	0.36	6.78	+	0.36	7.44	+	0.28	6.7
DR-03	Hinsdale Substation	6.06	+	0.25	7.46	+	0.23	7.14	+	0.37	7.67	+	0.37	7.1
DR-04	Northfield, MA	5.10	+	0.24	5.99	+	0.22	5.53	+	0.29	6.45	+	0.24	5.8
DR-05	Spofford Lake, NH	5.27	+	0.26	6.81	+	0.25	6.47	+	0.32	7.12	+	0.29	6.4
DR-06	Vernon School	5.82	+	0.29	6.80	+	0.27	6.57	+	0.34	7.09	+	0.32	6.6
DR-07	Site Boundary	6.81	+	0.24	8.37	+	0.38	7.79	+	0.29	8.00	+	0.28	7.7
DR-08	Site Boundary	7.98	+	0.28	9.17	+	0.35	8.38	+	0.30	8.47	+	0.34	8.5
DR-09	Inner Ring	5.75	+	0.49	6.28	+	0.32	5.74	+	0.35	6.98	+	0.33	6.2
DR-10	Outer Ring	5.00	+	0.28	5.58	+	0.24	4.98	+	0.31	5.85	+	0.26	5.4
DR-11	Inner Ring	5.38	+	0.26	6.11	+	0.29	5.53	+	0.22	6.28	+	0.31	5.8
DR-12	Outer Ring	5.41	+	0.35	5.74	+	0.24	5.61	+	0.28	6.00	+	0.30	5.7
DR-13	Inner Ring	5.87	+	0.44	6.73	+	0.33	5.90	+	0.32	7.07	+	0.21	6.4
DR-14	Outer Ring	6.14	+	0.41	7.74	+	0.36	6.97	+	0.35	7.73	+	0.37	7.1
DR-15	Inner Ring	6.38	+	0.40	6.88	+	0.25	6.20	+	0.28	6.72	+	0.28	6.5
DR-16	Outer Ring	6.63	+	0.32	6.99	+	0.28	6.60	+	0.33	7.52	+	0.49	6.9
DR-17	Inner Ring	5.43	+	0.28	6.36	+	0.32	5.76	+	0.33	6.42	+	0.22	6.0
DR-18	Outer Ring	5.67	+	0.27	6.63	+	0.26	6.13	+	0.48	6.89	+	0.49	6.3
DR-19	Inner Ring	5.99	+	0.27	7.40	+	0.32	7.07	+	0.29	7.87	+	0.28	7.1
DR-20	Outer Ring	6.07	+	0.33	7.28	+	0.32	6.56	+	0.37	7.39	+	0.43	6.8
DR-21	Inner Ring	5.32	+	0.30	6.59	+	0.32	6.36	+	0.32	7.05	+	0.29	6.3
DR-22	Outer Ring	5.92	+	0.24	6.92	+	0.48	6.29	+	0.31	7.19	+	0.47	6.6
DR-23	Inner Ring	5.74	+	0.21	5.87	+	0.33	5.71	+	0.22	6.29	+	0.31	5.9
DR-24	Outer Ring	5.12	+	0.19	5.97	+	0.23	5.40	+	0.42	6.36	+	0.22	5.7
DR-25	Inner Ring	5.68	+	0.29	6.37	+	0.30	5.69	+	0.25	6.88	+	0.28	6.2
DR-26	Outer Ring	5.32	+	0.25	6.84	+	0.30	6.41	+	0.32	6.99	+	0.26	6.4
DR-27	Inner Ring	5.72	+	0.62	6.32	+	0.29	5.84	+	0.22	6.64	+	0.23	6.1
DR-28	Outer Ring	5.77	+	0.29	6.76	+	0.27	6.38	+	0.25	6.98	+	0.22	6.5
DR-29	Inner Ring	5.94	+	0.29	6.60	+	0.35	6.11	+	0.27	7.30	+	0.39	6.5
DR-30	Outer Ring	5.46	+	0.22	6.65	+	0.26	6.17	+	0.30	7.00	+	0.34	6.3
DR-31	Inner Ring	5.57	+	0.25	6.48	+	0.41	6.36	+	0.40	7.01	+	0.31	6.4
DR-32	Outer Ring	5.40	+	0.23	6.27	+	0.30	5.97	+	0.32	6.48	+	0.33	6.0
DR-33	Inner Ring	5.97	+	0.26	6.47	+	0.27	6.49	+	0.29	7.33	+	0.41	6.6
DR-34	Outer Ring	5.87	+	0.31	6.89	+	0.28	6.69	+	0.32	6.99	+	0.39	6.6
DR-35	Inner Ring	5.63	+	0.35	6.33	+	0.27	6.06	+	0.36	6.62	+	0.43	6.2
DR-36	Outer Ring	7.20	+	0.83	7.70	+	0.32	7.07	+	0.39	7.70	+	0.32	7.4
DR-37	Inner Ring	5.52	+	0.31	6.73	+	0.28	6.71	+	0.30	7.01	+	0.25	6.5
DR-38	Outer Ring	5.69	+	0.28	6.72	+	0.36	6.56	+	0.37	7.27	+	0.27	6.6
DR-39	Inner Ring	6.10	+	0.51	6.58	+	0.29	6.77	+	0.33	7.10	+	0.29	6.6
DR-40	Outer Ring	6.05	+	0.31	6.70	+	0.26	6.33	+	0.34	7.10	+	0.33	6.5

Note: Blank spaces indicate missing TLDs

TABLE 5.3 (cont.)

ENVIRONMENTAL TLD MEASUREMENTS  
2011  
(Micro-R per Hour)

Sta. No.	Description	1ST QUARTER			2ND QUARTER			3RD QUARTER			4TH QUARTER			ANNUAL AVE. EXP.
		EXP.	S.D.		EXP.	S.D.		EXP.	S.D.		EXP.	S.D.		
DR-07	Site Boundary	6.81	+	0.24	8.37	+	0.38	7.79	+	0.29	8.00	+	0.28	7.7
DR-08	Site Boundary	7.98	+	0.28	9.17	+	0.35	8.38	+	0.30	8.47	+	0.34	8.5
DR-41	Site Boundary	6.41	+	0.29	7.16	+	0.26	7.18	+	0.35	7.20	+	0.28	7.0
DR-42	Site Boundary	5.58	+	0.28	6.89	+	0.45	6.75	+	0.25	7.04	+	0.31	6.6
DR-43	Site Boundary	6.40	+	0.40	7.69	+	0.38	7.50	+	0.33	7.80	+	0.43	7.4
DR-44	Site Boundary	9.51	+	0.47	9.63	+	0.39	8.77	+	0.37	9.23	+	0.50	9.3
DR-45	Site Boundary	14.89	+	0.67	12.60	+	0.45	11.84	+	0.82	13.61	+	0.79	13.2
DR-46	Site Boundary	8.48	+	0.34	8.91	+	0.44	8.54	+	0.41	9.20	+	0.51	8.8
DR-47	Site Boundary	6.99	+	0.24	7.50	+	0.27	7.74	+	0.35	8.08	+	0.34	7.6
DR-48	Site Boundary	4.82	+	0.27	5.93	+	0.19	5.68	+	0.26	6.45	+	0.38	5.7
DR-49	Site Boundary	5.52	+	0.24	6.04	+	0.26	6.14	+	0.35	6.48	+	0.26	6.0
DR-50	Governor Hunt House	6.25	+	0.26	7.09	+	0.31	7.01	+	0.27	7.44	+	0.22	7.0
DR-51	Site Boundary	7.11	+	0.28	8.55	+	0.39	8.19	+	0.35	8.64	+	0.50	8.1
DR-52	Site Boundary	8.81	+	0.40	9.47	+	0.30	9.39	+	0.40	9.21	+	0.58	9.2
DR-53	Site Boundary	8.98	+	0.47	10.18	+	0.47	9.68	+	0.41	9.76	+	0.35	9.7



## 6. ANALYSIS OF ENVIRONMENTAL RESULTS

### 6.1 Sampling Program Deviations

Off-site Dose Calculation Manual Control 3.5.1 allows for deviations “if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons.” In 2011, eleven deviations were noted in the REMP. These deviations did not compromise the program’s effectiveness and are considered typical with respect to what is normally anticipated for any radiological environmental program. The specific deviations for 2011 were:

- a) The South River Station River Water pump which provides a river water sample to the composite sampler at this location was found to be out of service on March 18, 2011. It was determined that the water pump had ceased function as a result a short-term interruption of electrical service to the station as a result of a winter storm. When the electrical power was restored the cold weather had frozen the water lines from the river to the sample station. The water lines were thawed and the pump restored to service on March 23, 2011.
- b) Radioiodine (Iodine-131) was indentified on one offsite environmental station (North Hinsdale APCF-12) charcoal filter for the week ending March 29, 2011. The cartridge was collecting sample from March 22 through March 29, 2011. The measured concentration of Iodine-131 was approximately 0.05 picocuries per cubic meter of collected air volume. This activity was attributed to the recent accident at Fukushima Daiichi Nuclear Power Station in Japan since no increase in radioiodines was measured in the reactor coolant at Vermont Yankee prior to the collection of this sample.
- c) All of the charcoal cartridges removed from Vermont Yankee's Offsite Environmental Air Sample Stations on April 5, 2011 (continuously collecting sample volume from March 29, 2011 through April 5, 2011) were found to have detectable levels of Iodine-131. The highest concentration of all of the seven filters was found at the Governor Hunt House station (APCF-40) located at the western edge of the Vermont Yankee Owner Control Area. Each of the Control Location Stations (Spofford New Hampshire and Northfield Massachusetts) as well as the other four Indicator Stations were found to have measurable concentrations of Iodine-131. The highest concentration of the seven samples was measured at 0.109 picocuries per cubic meter of air sampled. This is approximately 12.1 percent (%) of the required reporting level for air samples. This activity was attributed to the recent accident at Fukushima Daiichi Nuclear Power Station in Japan since no increase in radioiodines was measured in the reactor coolant at Vermont Yankee prior to the collection of this sample.
- d) Four of the five dairies' milk samples collected on April 5, 2011 were found to have detectable levels of Iodine-131. The highest concentration of all of the four positive milk samples was measured at 0.777 picocuries per liter of milk. The samples concentrations for Iodine-131 ranged from the highest at 0.777 picocuries per liter of milk to the lowest at 0.410 picocuries per liter of milk. Iodine-131 was measured in both Control and Indicator dairies supplying milk samples to the Vermont Yankee Radiological Environmental Monitoring Program (REMP). The Vermont Yankee Offsite Dose Calculation Manual Table 3.5.2 specifies a reporting level of 3.0 picocuries per liter of milk sampled. The highest concentration of the seven samples was measured at 0.777 picocuries per cubic meter of air sampled. This is approximately 25.9 percent (%) of the required reporting level for milk samples in VY ODCM Table 3.5.2. This activity was attributed to the recent accident at Fukushima Daiichi

Nuclear Power Station in Japan since no increase in radioiodines was measured in the reactor coolant at Vermont Yankee prior to the collection of this sample.

- e) Four of the seven charcoal cartridges removed from Vermont Yankee's Offsite Environmental Air Sample Stations on April 12, 2011 (continuously collecting sample volume from April 5th, 2011 through April 12, 2011) were found to have detectable levels of Iodine-131. The highest concentration of all of the four filters was found at the Tyler Hill Road (Vernon) station (APCF-15) located west of the Vermont Yankee plant site. One of the Control Location Stations (Spofford New Hampshire) as well as two other Indicator Stations (River Station-APCF-11 and Hinsdale Substation-APCF-13) were found to have measurable concentrations of Iodine-131. The Vermont Yankee Offsite Dose Calculation Manual Table 3.5.2 specifies a reporting level of 0.900 picocuries per cubic meter of air sampled. The highest concentration of the four samples was measured at 0.0430 picocuries per cubic meter of air sampled. This is approximately 4.8 percent (%) of the required reporting level for Iodine-131 found in air samples. This activity was attributed to the recent accident at Fukushima Daiichi Nuclear Power Station in Japan since no increase in radioiodines was measured in the reactor coolant at Vermont Yankee prior to the collection of this sample.
- f) The South River Station-River Water Composite Sampler was not receiving water sample from the Connecticut River on April 10, 2011. There was no water flow to the River Water Composite Sampler at the South River Station (Station #3-3) located off Stebbins Road in Vernon, Vermont. The submersible pump was found to be fouled with river silt and the line from the pump to the sampler was also clogged with silt due to elevated silt levels in the river from spring melting conditions. The lines were cleared and the pump replaced and the station was restored to full function on May 12, 2011.
- g) The South River Station-River Water Composite Sampler Submersible Pump was removed from service for a short period due to noisy South River Station Temperature Monitor data on May 19, 2011. This action was taken because the primary temperature monitor was providing a noisy signal while the submersible pump is operating. The backup downstream river temperature monitor, to be utilized in the event that data is unavailable from the primary temperature monitor, has been out of service for an extended period. The temperature monitor was replaced and the submersible pump was restored to service on May 19, 2011.
- h) The South River Station - River Water Composite Sampler Submersible Pump was found out of service on 6/14/2011. The submersible pump was replaced following removal of silt from the sample tube. This replacement was completed on 6/15/2011 and river water sample flow was restored to the River Water Composite Sampler. The submersible pump was found to have failed as a result of silting of the steel pump deployment tube. The silting of the tube occurred during a period of high river water level due to recent heavy rainfall events over much of Vermont and New Hampshire.
- i) The South River Station - River Water Composite Sampler Submersible Pump was found out of service on October 9, 2011. The pump controller was found to have failed due to a power surge and was replaced. River water sample flow was restored to the River Water Composite Sampler following this replacement on October 9, 2011.
- j) During a review of the air sample collection data for week #44, year 2011, it was determined that three air sample stations were not collecting air sample volume for a period of time following a significant snowstorm in the area on October 29, 2011. The remaining four air sample stations did not lose power supply and lost no sample collection time during the same week. APCF-12 (located in North Hinsdale, NH) was out of power for approximately 10 hours. APCF-14 (Located in Northfield Massachusetts) was out of power for approximately 29.5 hours. APCF-15 (located on Tyler Hill

Road in Vernon, Vermont) was out of power for approximately 3.25 hours. All three sample stations were performing sample collection properly when weekly samples were collected on 11/1/2011.

- k) Continuous environmental air sample collection at the offsite environmental air sample station (APCF-14) located in Northfield Massachusetts was interrupted during Week 49 in year 2011. A fuse was found to have failed at the offsite environmental air sample station. This resulted in a loss of sample collection for a period of approximately 77 hours during week 49. The technician replaced the blown fuse and the sample station then functioned normally with no observable problems.
- l) Air sample station outages during 2011 are reflected in the air sample collection time percentages listed below.

AP/CF #	1 <sup>st</sup> Quarter	2 <sup>nd</sup> Quarter	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter
11	100%	99.7%	100%	99.7%
12	99.9%	99.5%	99.7%	99.7%
13	100%	99.9%	100%	98.5%
14	87.4%	100%	87.4%	84.8%
15	99.9%	99.6%	100%	99.7%
21	99.3%	100%	100%	99.8%
40	100%	100%	98.9%	99.6%

## 6.2 Comparison of Achieved LLDs with Requirements

Table 4.5.1 of the VYNPS ODCM (also shown in Table 4.4 of this report) gives the required Lower Limits of Detection (LLDs) for environmental sample analyses. On occasion, an LLD is not achievable due to a situation such as a low sample volume caused by sampling equipment malfunction or limited sample availability. In such a case, ODCM 10.2 requires a discussion of the situation. At the contracted environmental laboratory, the target LLD for the majority of analyses is 50 percent of the most restrictive required LLD. Expressed differently, the typical sensitivities achieved for each analysis are at least 2 times greater than that required by the VYNPS ODCM.

For each analysis having an LLD requirement in ODCM Table 4.5.1, the *a posteriori* (after the fact) LLD calculated for that analysis was compared with the required LLD. During 2011, all sample analyses performed for the REMP program achieved an *a posteriori* LLD less than the corresponding LLD requirement.

## 6.3 Comparison of Results with Reporting Levels

ODCM Section 10.3.4 requires written notification to the NRC within 30 days of receipt of an analysis result whenever a Reporting Level in ODCM Table 3.5.2 is exceeded. Reporting Levels are the environmental concentrations that relate to the ALARA design dose objectives of 10 CFR 50, Appendix I. Environmental concentrations are averaged over the calendar quarters for the purposes of this

comparison. The Reporting Levels are intended to apply only to measured levels of radioactivity due to plant effluents. During 2011, no analytical result exceeded a corresponding reporting level requirement in Table 3.5.2 of the ODCM.

#### **6.4 Changes in Sampling Locations**

The Vermont Yankee Nuclear Power Station Off-Site Dose Calculation Manual Section 10.2 states that if “new environmental sampling locations are identified in accordance with Control 3.5.2, the new locations shall be identified in the next Annual Radiological Environmental Operating Report.” There were no required sampling location changes due to the Land Use Census conducted in 2011.

Milk collection from Dunklee Farm (Vern-Mont Farm in Vernon) commenced in April, 2010 at the request of the farm owner. At this time, all dairy farms in Vernon are supplying milk for analysis.

County Farm, located in Westmoreland, New Hampshire, ceased operations on May 4, 2011 as a result of completion of the new County Correctional Facility in Marlborough, New Hampshire.

#### **6.5 Data Analysis by Media Type**

The 2011 REMP data for each media type is discussed below. Whenever a specific measurement result is presented, it is given as the concentration in the units of the sample (volume or weight). An analysis is considered to yield a “detectable measurement” when the concentration exceeds three times the standard deviation for that analysis and is greater than or equal to the Minimum Detectable Concentration (MDC) for the analysis. With respect to data plots, all net concentrations are plotted as reported, without regard to whether the value is “detectable” or “non-detectable.” In previous years, values that were less than the MDC were converted to zero.

##### **6.5.1 Airborne Pathways**

###### **6.5.1.1 Air Particulates (AP)**

The periodic air particulate filters from each of the seven sampling sites were analyzed for gross-beta radioactivity. At the end of each quarter, the filters from each sampling site were composited for a gamma analysis. The results of the air particulate sampling program are shown in Table 5.1 and Figures 6.1 through 6.7.

Gross beta activity was detected in all air particulate filters that were analyzed. As shown in Figure 6.1, there is no significant difference between the quarterly average concentrations at the indicator (near-plant) stations and the control (distant from plant) stations. Notable in Figure 6.1 is a distinct annual cycle, with the minimum concentration in the fourth quarter, and the maximum concentration in the third quarter.

Figures 6.2 through 6.7 show the weekly gross beta concentration at each air particulate sampling location compared to the control air particulate sampling location at AP-21 (Spofford Lake, NH). Small differences are evident and expected between individual sampling locations. Figure 6.2 clearly demonstrates the distinct annual cycle, with the minimum concentration in the second quarter, and the maximum concentration in the first quarter. It can be seen that the gross-beta measurements on air particulate filters fluctuate significantly over the course of a year. The measurements from control station AP-21 vary similarly, indicating that these fluctuations are due to regional changes in naturally-occurring airborne radioactive materials, and not due to Vermont Yankee operations.

There were two naturally-occurring gamma-emitting radionuclides detected on the air particulate filters during this reporting period. Be-7, a naturally-occurring cosmogenic radionuclide, was detected on 28 of 28 filter sets analyzed. K-40 was detected on three out of 28 analyzed. Ra-226 and Ac/Th-228 were not detected in the 28 filter sets analyzed.

#### **6.5.1.2 Charcoal Cartridges (CF)**

Charcoal cartridges from each of the seven air sampling sites were analyzed for I-131 each time they were collected. The results of these analyses are summarized in Table 5.1. As in previous years, no I-131 attributable to the operation of Entergy Vermont Yankee was detected in any charcoal cartridge. The I-131 detected in 12 out of 361 samples is directly attributed to the trans-Pacific transport of airborne releases from Dai-Ichi Fukushima following the March 11, 2011 Tohoku earthquake.

### **6.5.2 Waterborne Pathways**

#### **6.5.2.1 River Water (WR)**

Aliquots of river water were automatically collected periodically from the Connecticut River downstream from the plant discharge area and hydro station, location WR-11, with the exception of the two events of short duration when the sampling equipment was out of service (see Section 6.1). Monthly grab samples were also collected at the upstream control location, also on the Connecticut River, location WR-21. The composited samples at WR-11 were collected monthly and sent along with the WR-21 grab samples to

the contracted environmental laboratory for analysis. Table 5.1 shows that gross-beta measurements were positive in 12 out of 12 indicator samples and 11 out of 12 control samples, as would be expected, due to naturally-occurring radionuclides in the water. As seen in Figure 6.8, the mean concentration of the indicator locations was similar to the mean concentration at the control location in 2011.

For each sampling site, the monthly samples were composited into quarterly samples for H-3 (Tritium) analyses. None of the samples contained detectable quantities of H-3.

There was one naturally-occurring gamma-emitting radionuclides detected in river water samples during this reporting period. Ra-226, a naturally-occurring primordial radionuclide, was detected in 17 of 24 samples analyzed.

#### **6.5.2.2 Ground Water – Potable Drinking Water (WG)**

Quarterly ground water (deep wells supplying drinking water to the plant and selected offsite locations) samples were collected from four indicator locations (only one is required by VYNPS ODCM) and one control location during 2011. In 1999, WG-14 (PBS Well) another on-site well location was added to the program. In July 2011, WG-15 (Southwest Well) was added to the ODCM as a quarterly sample location. Table 5.1 and Figure 6.9 show that gross-beta measurements were positive in 13 out of 13 indicator samples and in 3 out of 4 control samples. The beta activity is due to naturally-occurring radionuclides in the water. The levels at all sampling locations, including the higher levels at station WG-13, were consistent with those detected in previous years. Naturally occurring Ra-226 was also detected in three samples and is naturally-occurring. No other gamma-emitting radionuclides or tritium were detected in any of the samples.

#### **6.5.2.3 Sediment (SE)**

Semi-annual river sediment grab samples were collected from two indicator locations during 2011. The North Storm Drain Outfall location (SE-12) is an area where up to 40 different locations can be sampled within a 20 ft by 140 ft area. In 2011, 18 locations were sampled at SE-12 during each of the semi-annual collections. Two samples were collected at SE-11 during the year. Be-7 was detected in three of the 36 samples analyzed. As would be expected, naturally-occurring Potassium-40 (K-40) was detected in all of the samples. Cobalt-60 was detected in one of the 36 samples. Radium-226 (Ra-226) was detected in 29 of 36 samples. Actinium-228 was detected in 31 of 36 samples. Thorium-228 (Th-228) was detected in all 36 samples analyzed. Thorium-232 (Th-232) was detected in all 36 samples analyzed. Uranium-238 (U-238) was not detected in any of the 36 samples. Cesium-137 (Cs-137) was detected in 24 out of 34 of the indicator samples and none of the two control samples. The levels of Cs-137 measured were consistent with what has been measured in the previous several years and with those detected at other

New England locations as a result of mid 19<sup>th</sup> century weapons testing fallout around the globe. Section 2.2 provides more information on the results of weapons testing on environmental contamination.

#### **6.5.2.4 Test Wells (WT)**

During 1996, sampling was initiated at test wells around the outer edges of an area in the south portion of the VYNPS site where septic sludge is spread. This sampling continued through 2011. The test well locations are shown on Figure 4.1 and the results are summarized in Table 5.1 under the media category, Test Well (WT). In 2011, five samples were taken at each of the four locations and all were analyzed for gamma isotopic, gross beta and H-3 activity.

Prior to the gross beta analysis, each sample was filtered through a 0.45 micron Gelman Tuffryn membrane filter. Gross beta activity was detected in all 20 samples collected with levels ranging from 5.12 to 22.5 pCi/kg. K-40 was also detected in four of the 20 samples. No other radionuclides were detected.

#### **6.5.2.5 Storm Drain System**

The presence of plant-generated radionuclides in the onsite storm drain system has been identified in previous years at Vermont Yankee (VY). As a consequence, a 50.59 evaluation of radioactive materials discharged via the storm drain system was performed in 1998. This assessment was in response to Information and Enforcement Bulletin No. 80-10 and NRC Information Notice No. 91-40. The evaluation demonstrated that the total curies released via the VYNPS storm drain system are not sufficient to result in a significant dose (i.e. dose does not exceed 10% of the technical specification objective of 0.3 millirem per year to the total body, and 1.0 millirem per year to the target organ for the maximally exposed receptor). Water and sediment in the onsite storm drain system was routinely sampled throughout 2011 at various points. The results of this sampling are summarized below.

Sediment samples were taken from the storm drain system at onsite manhole locations in 2011 for a total of 10 samples. All samples were analyzed for gamma emitting isotopes. Table 6-1 summarizes the analytical results of the sediment samples. The naturally-occurring isotope Ra-226 was found in 8 of 10 samples as expected. The highest detected concentration for all plant-related radionuclides that were detected in sediment samples was found in sample SE-92 which is also designated by the plant as Manhole 12A.

No Cobalt-60 or Cesium-137 was detected in 2011.

**Table 6.1**

**Summary of Storm Drain System Sediment Sample Analyses\***

Isotope	No. Detected**	Mean (pCi/kg)	Range (pCi/kg)	Station With Highest Detected Concentration
Ra-226	8/10	1.33 E 3	(1.01– 1.79) E 3	MH-12A (SE-92)
Cs-137	0/10	NA	NA	-
Mn-54	0/10	NA	NA	-
Co-60	2/10	4.9 E 1	(2.75 – 6.67) E 1	MH-12A (SE-92)
Zn-65	0/10	NA	NA	-

\* Radionuclides that were not detected in any sample are not listed

\*\* The fraction of sample analyses yielding detectable measurements (i.e. >3 standard deviations).

The mean and the range are determined only from the samples where activity was >3 standard deviations.

Water samples were taken from the storm drain system at various access points in 2011 including Manholes MH-8, MH-11H, MH-12A, MH-13, and MH-14. Table 6-2 summarizes the analytical results of water samples from the storm drain system (MH-12A and MH-14) in 2011. Naturally-occurring Ra-226 was detected in 15 of the 20 samples. Low levels of gross beta activity were detected in all of the 20 samples analyzed, at concentrations that are typical of any environmental water sample. Tritium (H-3) was not detected in the 20 samples analyzed.

In 1998, an additional dose assessment was performed that incorporated all of the 1998 storm drain system analytical results (including both sediment and water). The dose assessment was performed using the maximum measured concentration of radionuclides in 1998, and a conservative estimate of the volume of sediment and water discharged via the storm drain system. The results of this dose assessment are estimates of the total body and maximum organ dose equaling 3.2% and 1.6% of the corresponding Technical Specification dose limits respectively. Therefore, there was no significant dose impact from plant-related radionuclides in the storm drain system in 1998. The sampling conducted in 2011 indicates that the presence of radionuclides in the storm drain system has not changed significantly. Therefore, the storm drain system remains an insignificant impact to dose. The VYNPS staff will continue to monitor the presence of plant related radionuclides in the storm drain system.



**Table 6.2**

**Summary of Storm Drain System Water Sample Analyses\***

Isotope	No. Detected **	Mean (pCi/L)	Range (pCi/L)	Station With Highest Detected Concentration
Gross Beta	20/20	3.8 E 0	(1.1 – 12.9) E 0	MH-12A (WW-12)
H-3	0/20	NA	NA	-
Ra-226	15/20	1.1E 2	(0.57 – 1.71) E 2	MH-12A (WW-12)
I-131	0/20	NA	NA	-
Cs-134	0/20	NA	NA	-
Cs-137	0/0	NA	NA	-
ZrNb-95	0/20	NA	NA	-
Co-58	0/20	NA	NA	-
Mn-54	0/20	NA	NA	-
Zn-65	0/20	NA	NA	-
Fe-59	0/20	NA	NA	-
Co-60	0/20	NA	NA	-
Ba/La-140	0/20	NA	NA	-

\* Radionuclides that were not detected in any sample are not listed

\*\* The fraction of sample analyses yielding detectable measurements (i.e. >3 standard deviations).

#### **6.5.2.6 Air Compressor Condensate and Manhole Sampling Results**

The presence of tritium in station air compressor condensate and manholes (Storm Drain System) has been identified since 1995 (ER\_95-0704). An evaluation has been performed (S.R.1592) which states "...leakage of tritium found in the storm drains (manholes) to ground water beneath the site will be transported by natural ground water gradient to the Connecticut River. However, at the current measured concentrations and postulated leak rate from the storm drains, the offsite dose impact is not significant (<2.4E-5 mrem/year)." Data provided in Table 6.3 will be filed under the requirements of 10CFR50.75(g) and is presented here in response to ER\_95-0704\_04 commitments. Because of revisions in the security arrangements at the plant site, there was no water available for collection in Manholes 13 and 8 during 2011. Only one sample was available from Manhole 11H during 2011. Air compressor condensate is now routed to the plant radwaste system to be polished and reused in plant systems.

**Table 6.3**  
**Summary of Air Compressor Condensate and Manhole Water Tritium Concentrations\***

Sample Location	No. Detected**	Mean ( microcuries/ml )	Range (microcuries/ml)
Air Compressor Condensate	6/6	4.02E-5	(1.88– 9.50) E-5
Manhole 11H	0/1	NA	NA
Manhole 13	0/0	No Sample Available	No Sample Available
Manhole 8	0/0	No Sample Available	No Sample Available

\* Reported per ER\_950704\_04.

\*\* The fraction of sample analyses yielding detectable measurements

### 6.5.2.7 Groundwater Monitoring Wells Samples Results (WS)

Leakage from primary system piping between the Augmented Off Gas (AOG) Building and the Turbine Building was identified early in 2010. A large pool of subsurface water became contaminated with Tritium as a result of this leak. A large number of new groundwater sample wells were installed and a significant effort was mounted to find the leak and fix it. Presently, mitigation efforts have resulted in the extraction of more than 300000 gallons of tritiated water from this subsurface pool. Dose calculations have been performed assuming that this under ground plume of contaminated water is moving towards and into the Connecticut River. The dose impacts and other details of this event are provided in the year 2011 Annual Radioactive Effluent Release Report.

### 6.5.3 Ingestion Pathways

#### 6.5.3.1 Milk (TM)

Milk samples from cows at several local farms were collected monthly during 2011. Twice-per-month collections were made during the “pasture season” since the milking cows or goats were identified as being fed pasture grass during that time. Each sample was analyzed for I-131 and other gamma-emitting radionuclides. Quarterly composites (by location) were analyzed for Sr-89 and Sr-90.

As expected, naturally-occurring K-40 was detected in all samples. Also expected was Sr-90. Sr-90 was detected in two out of 12 indicator samples and four out of 10 control samples. Although Sr-90 is a by-product of nuclear power plant operations, the levels detected in milk are consistent with that expected

from worldwide fallout from nuclear weapons tests, and to a much lesser degree from fallout from the Chernobyl incident. The Sr-90 levels shown in Table 5.1 and Figure 6.11 are consistent with those detected at other New England farms participating in other plant environmental monitoring programs. This radionuclide and Cs-137 are present throughout the natural environment as a result of atmospheric nuclear weapons testing that started primarily in the late 1950's and continued through 1980. They are found in soil and vegetation, as well as anything that feeds upon vegetation, directly or indirectly. The detection of Cs-137 in environmental milk samples is expected and has been detected in previous years. Cs-137 was not detected in any of the 95 samples in 2011. See Figure 6.10. It should be noted here that most of the Cs-137 concentrations and many of the Sr-90 concentrations shown on Figures 6.10 and 6.11, respectively, are considered "not detectable." All values have been plotted, regardless of whether they were considered statistically significant or not. As shown in these figures, the levels are also consistent with those detected in previous years near the VYNPS plant. There is also little actual difference in concentrations between farms. As in previous years, no I-131 attributable to the operation of Entergy Vermont Yankee was detected in any milk sample. The I-131 detected in five out of 95 samples is directly attributed to the trans-Pacific transport of airborne releases from Dai-Ichi Fukushima following the March 11, 2011 Tohoku earthquake.

#### **6.5.3.2 Silage (TC)**

A silage sample was collected from each of the required milk sampling stations during October. Each of these was analyzed for gamma-emitting radionuclides and I-131. As expected with all biological media, naturally-occurring Be-7 was detected in three of five samples and K-40 was detected in all samples. Naturally-occurring Ra-226 was detected in two of the five samples. No Cs-137 or I-131 was detected in any sample.

#### **6.5.3.3 Mixed Grass (TG)**

Mixed grass samples were collected at each of the air sampling stations during three of the four quarters of 2011. As expected with all biological media, naturally-occurring Be-7 was detected in 17 of the 21 samples. Naturally-occurring K-40 was detected in all samples. Naturally-occurring Ra-226 was detected in nine of the 21 samples. Cs-137 was not detected in any of the samples.

#### **6.5.3.4 Fish (FH)**

Semiannual samples of fish were collected from two locations in both spring and fall of 2011 for the VY

REMP. Fish were also collected in response to the detection of tritium in subsurface water under the plant site in January, 2010. Several species are collected such as Walleye, Small Mouth Bass, Large Mouth Bass, Yellow Perch, White Perch, and Rock Bass. The edible portions of each of these were analyzed for gamma-emitting radionuclides. As expected in biological matter, naturally-occurring K-40 was detected in all 32 samples. In addition to the analysis of edible portions, the inedible portions were also analyzed in response to the tritium leak. These fish were also analyzed for Gross Beta, H-3, Am-241, Cm-242, Cm-243/244, Fe-55, Ni-63, Pu-2328, Pu-239/240, Pu-241, Pu-242, Sr-89 and Sr-90.

Strontium 90 was detected in some of the inedible portions (bones, guts and skin are included in the 'inedible' portion). This is the second year in the VY REMP program that fish has been analyzed for Hard-to-Detects such as Strontium-90. The results were compared to studies done in the Hudson River by New York State officials and it was concluded that the Strontium-90 detected is a result of weapons-testing era fallout to the environment and not produced by nuclear power plants.

As shown in Table 5.1, Cs-137 was not detected in this year's samples. It should be noted that the majority of the Cs-137 concentrations plotted in Figure 6.12 are considered "not detectable." All values were plotted regardless of whether they were considered statistically significant or not. The Cs-137 levels plotted for 2011 and previous years are typical of concentrations attributable to global nuclear weapons testing fallout.

#### **6.5.4 Direct Radiation Pathway**

Direct radiation was continuously measured at 53 locations surrounding the Vermont Yankee plant with the use of thermoluminescent dosimeters (TLDs).

In 1999, DR-53 was added on the site boundary. The TLDs are collected every calendar quarter for readout at the environmental laboratory. The complete summary of data may be found in Table 5.3.

From Tables 5.2 and 5.3 and Figure 6.13, it can be seen that the Inner and Outer Ring TLD mean exposure rates were not significantly different in 2011. This indicates no significant overall increase in direct radiation exposure rates in the plant vicinity. It can also be seen from these tables that the Control TLD mean exposure rate was not significantly different than that at the Inner and Outer Rings. Figure 6.13 also shows an annual cycle at both indicator and control locations. The lowest point of the cycle occurs usually during the winter months. This is due primarily to the attenuating effect of the snow cover on radon emissions and on direct irradiation by naturally-occurring radionuclides in the soil. Differing amounts of these naturally-occurring radionuclides in the underlying soil, rock or nearby building materials result in different radiation levels between one field site and another.

Upon examining Figure 6.17, as well as Table 5.2, it is evident that in recent years, station DR-45 had a higher average exposure rate than any other station. This location is on-site, and the higher exposure rates are due to plant operations and activities in the immediate vicinity of this TLD. There is no significant dose potential to the surrounding population or any real individual from these sources since they are located on the back side of the plant site, between the facility and the river. The same can be said for station DR-46, which has shown higher exposure rates in previous years.

**Environmental Program Trend Graphs**  
2011 Radiological Environmental Operating Report  
Vermont Yankee

**Graphs:**

- 6.1 – Gross Beta Measurements on Air Particulate Filters (Average Concentrations)
- 6.2 – Gross Beta Measurements on Air Particulate Filters (11)
- 6.3 – Gross Beta Measurements on Air Particulate Filters (12)
- 6.4 – Gross Beta Measurements on Air Particulate Filters (13)
- 6.5 – Gross Beta Measurements on Air Particulate Filters (14)
- 6.6 – Gross Beta Measurements on Air Particulate Filters (15)
- 6.7 – Gross Beta Measurements on Air Particulate Filters (40)
- 6.8 – Gross Beta Measurement on River Water (Average Concentrations)
- 6.9 – Gross Beta Measurement on Ground Water (Average Concentrations)
- 6.10 – Cesium-137 in Milk (Annual Average Concentrations)
- 6.11 - Strontium 90 in Milk (Annual Average Concentrations)
- 6.12 – Cesium-137 in Fish (Annual Average Concentrations)
- 6.13 – Exposure Rate at Inner Ring, Outer Ring, and Control TLDS
- 6.14 – Exposure Rate at Indicator TLDS, DR01-03
- 6.15 – Exposure Rate at Indicator TLDS, DR 06,50
- 6.16 – Exposure Rate at Site Boundary TLDS, DR 07 - 08, 41 - 42
- 6.17 – Exposure Rate at Site Boundary TLDS, DR 43-46
- 6.18 – Exposure Rate at Site Boundary TLDS, DR 47-49, 51-53
- 6.19 – Exposure Rate at Inner Ring TLDS, DR 09-15(odd)
- 6.20 – Exposure Rate at Inner Ring TLDS, DR-17-23 (odd)
- 6.21 – Exposure Rate at Inner Ring TLDS, DR 25-31 (odd)
- 6.22 - Exposure Rate at Inner Ring TLDS, DR 33-39 (odd)
- 6.23 – Exposure Rate at Outer Ring TLDS, DR 10 - 16 (even)
- 6.24 – Exposure Rate at Outer Ring TLDS, DR 18-24 (even)
- 6.25 – Exposure Rate at Outer Ring TLDS, DR 26-32 (even)
- 6.26 – Exposure Rate at Outer Ring TLDS, DR 34-40 (even)
- 6.27 – Exposure Rate at Control TLDS, DR 04-05

**Figure 6.1 - Gross Beta Measurements on Air Particulate Filters - Quarterly Average Concentrations**

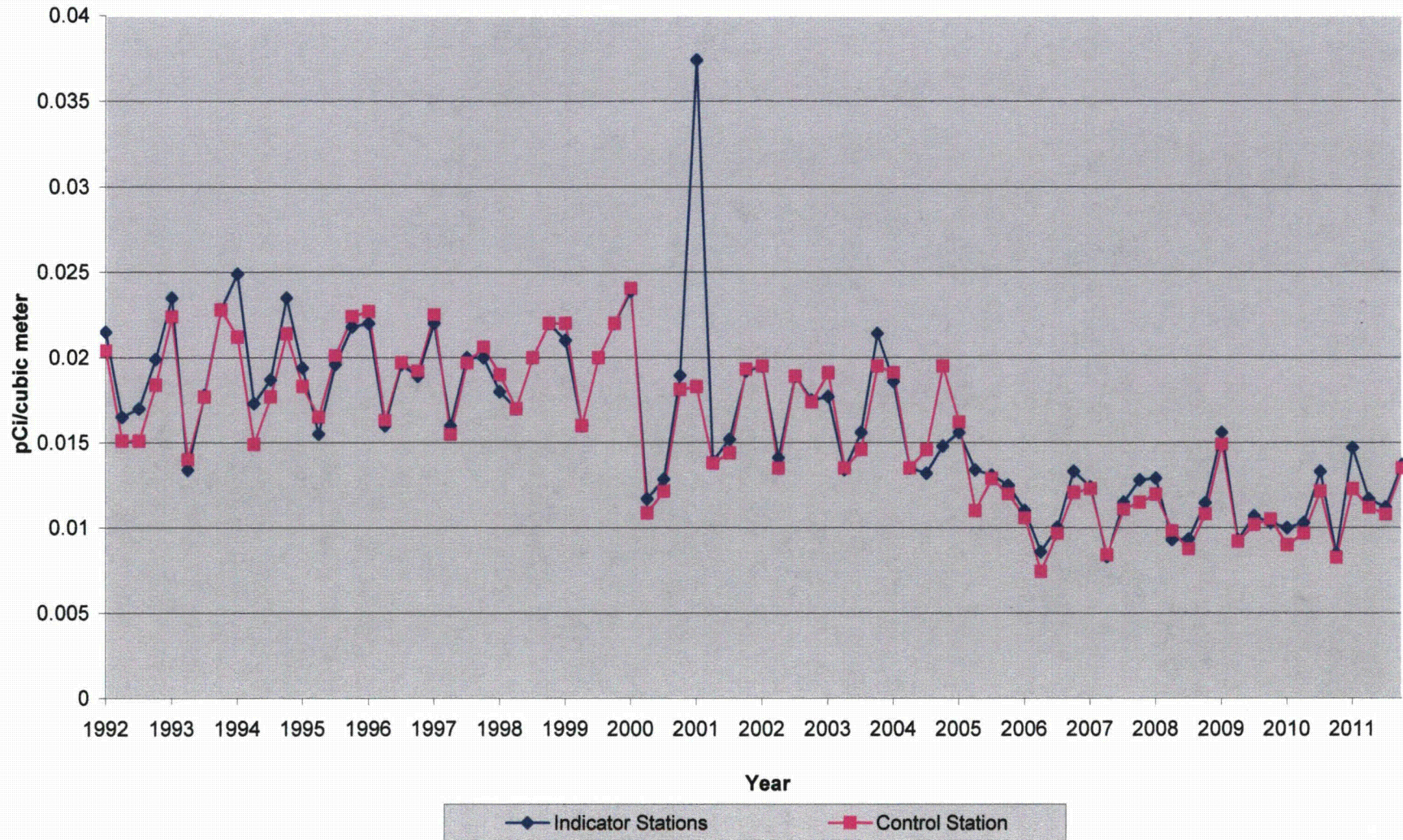


Figure 6.2 - Gross Beta Measurements on Air Particulate Filters

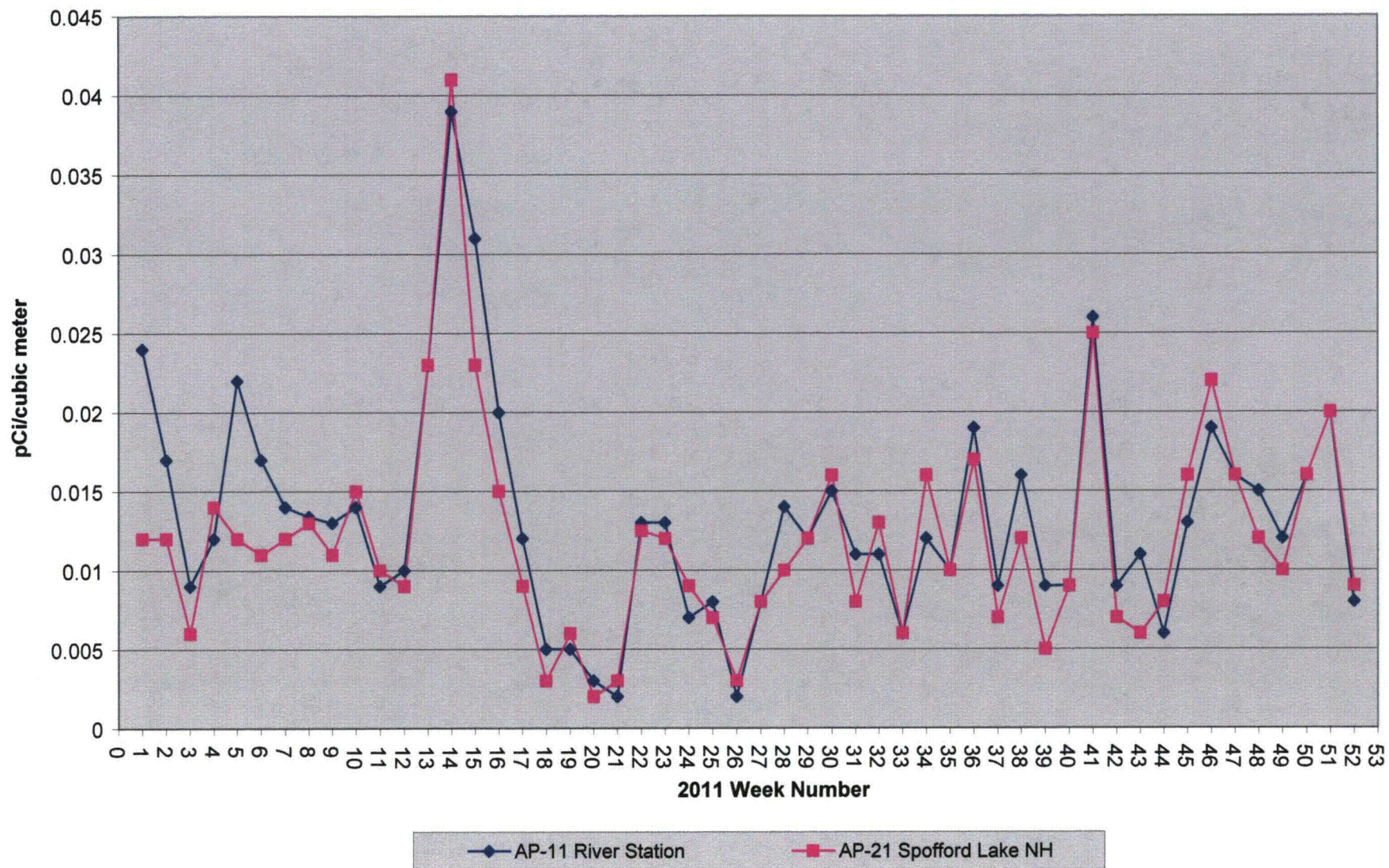




Figure 6.3 - Gross Beta Measurements on Air Particulate Filters

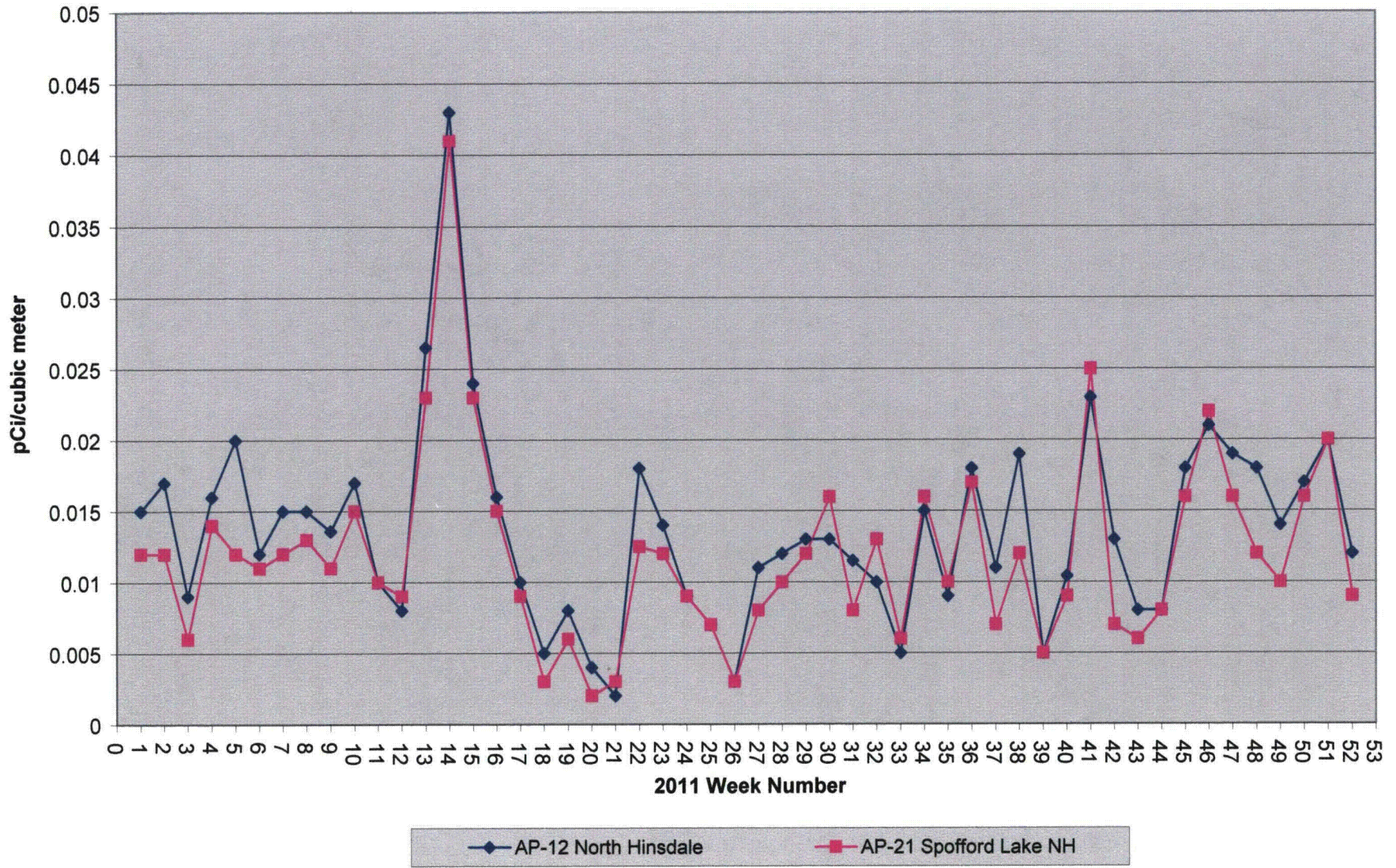


Figure 6.4 - Gross Beta Measurements on Air Particulate Filters

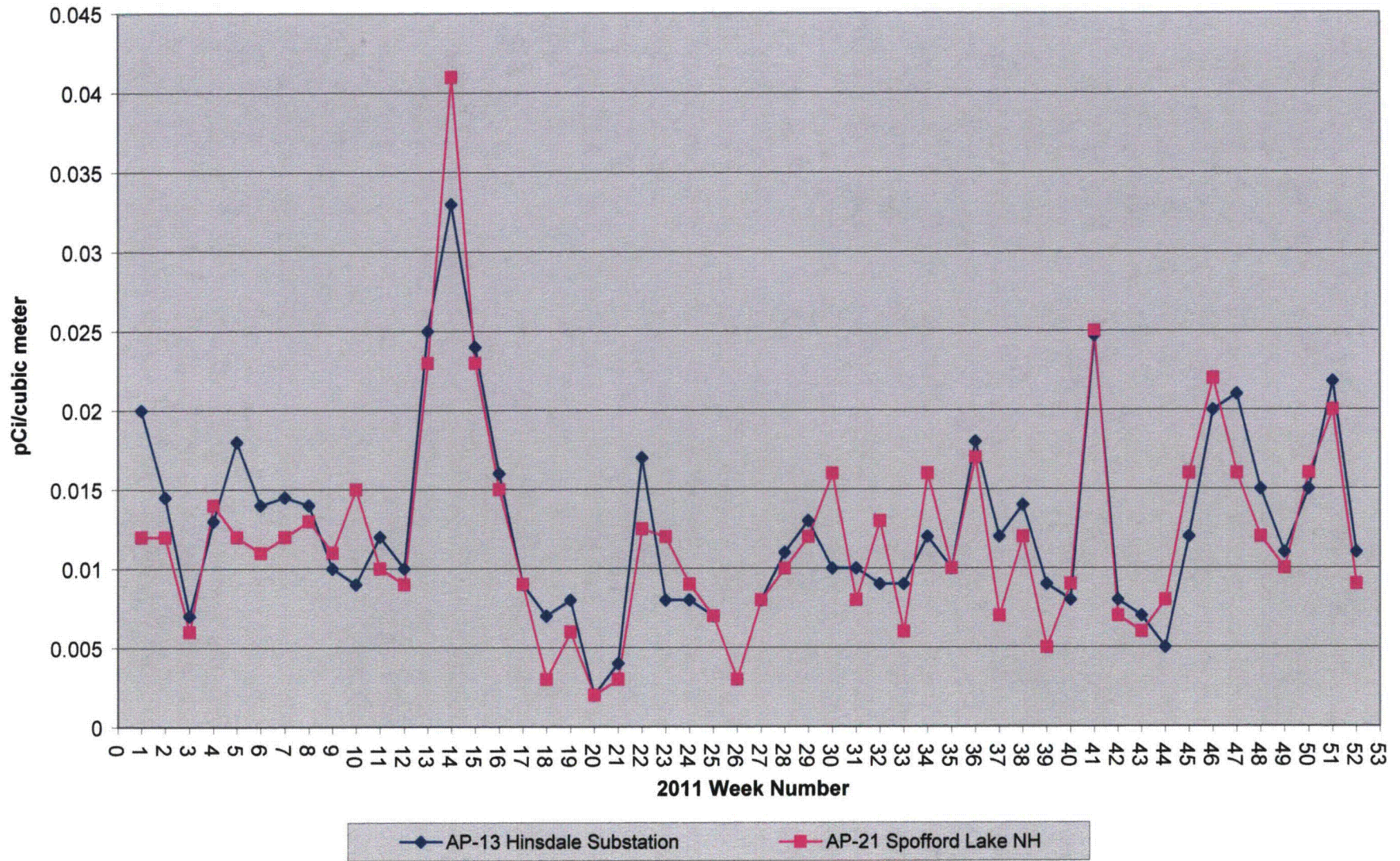


Figure 6.5 - Gross Beta Measurements on Air Particulate Filters

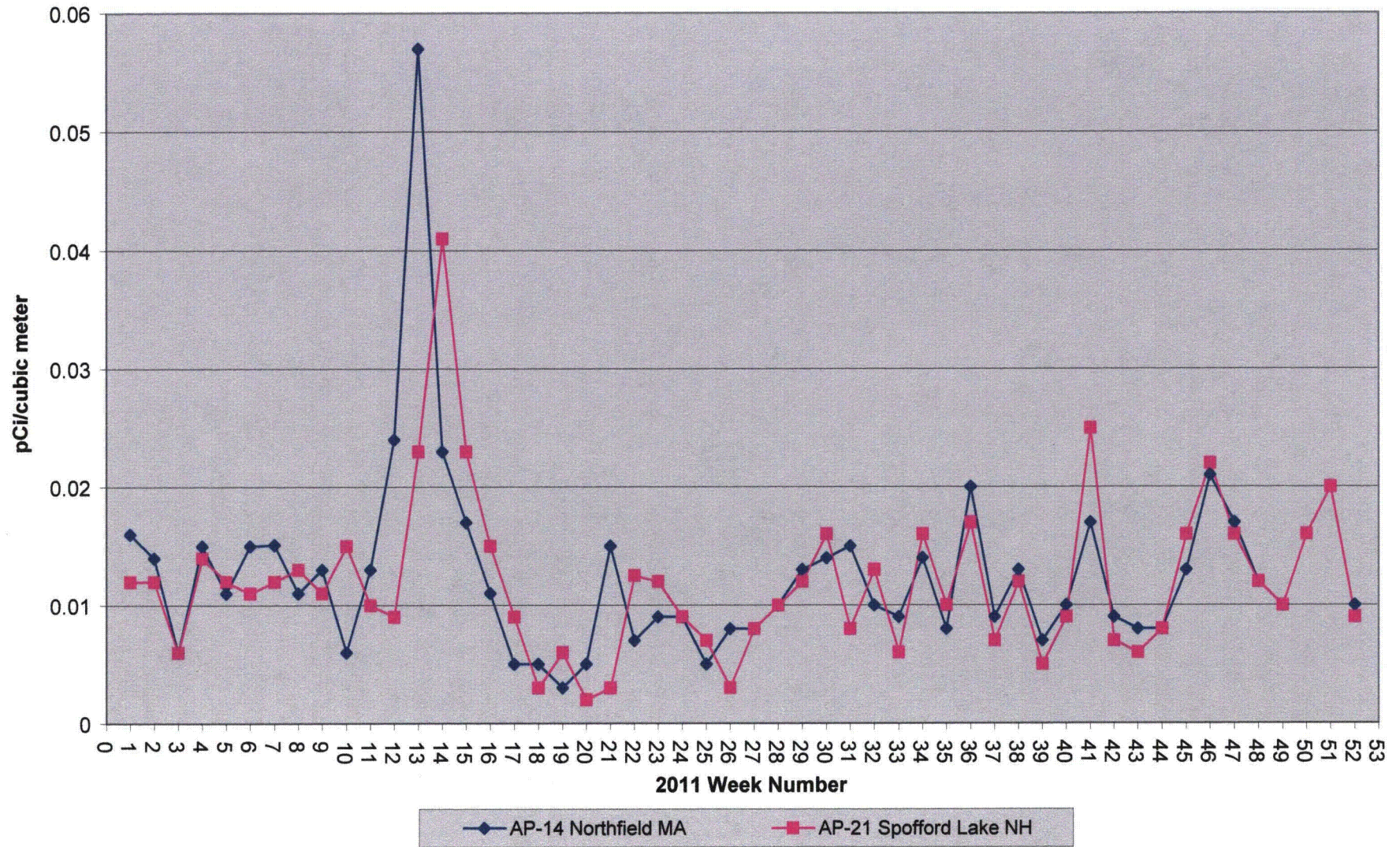


Figure 6.6 - Gross Beta Measurements on Air Particulate Filters

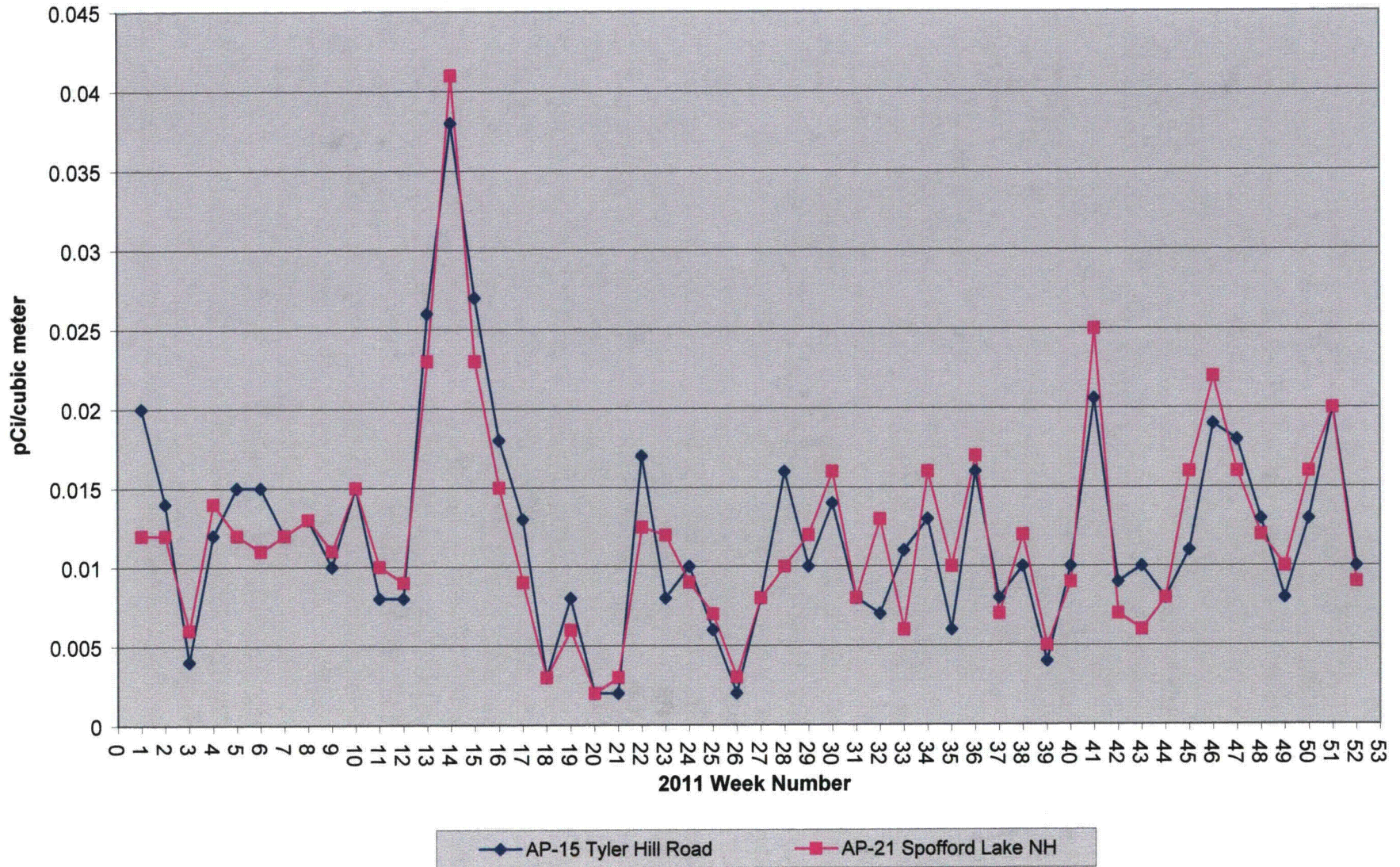
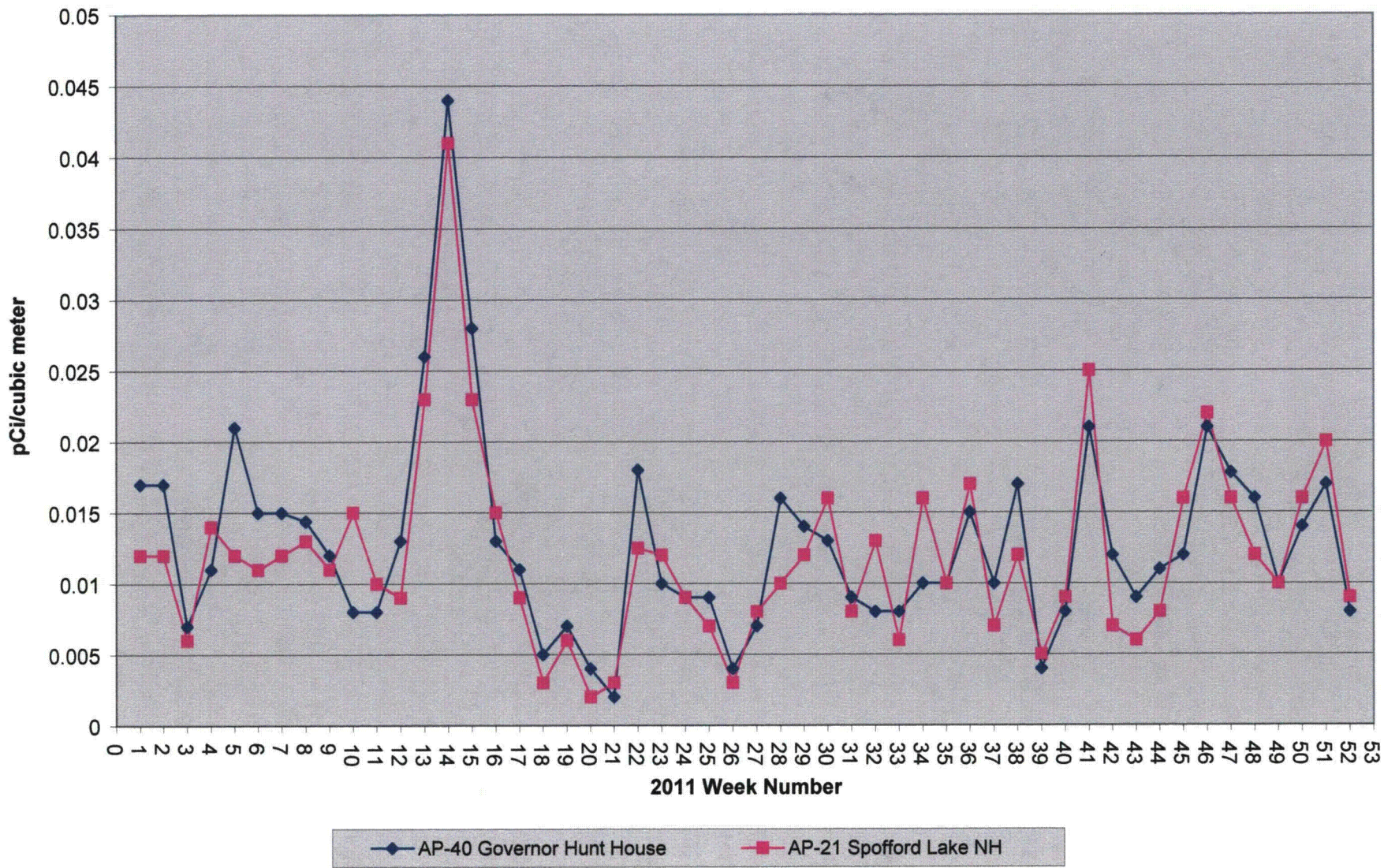
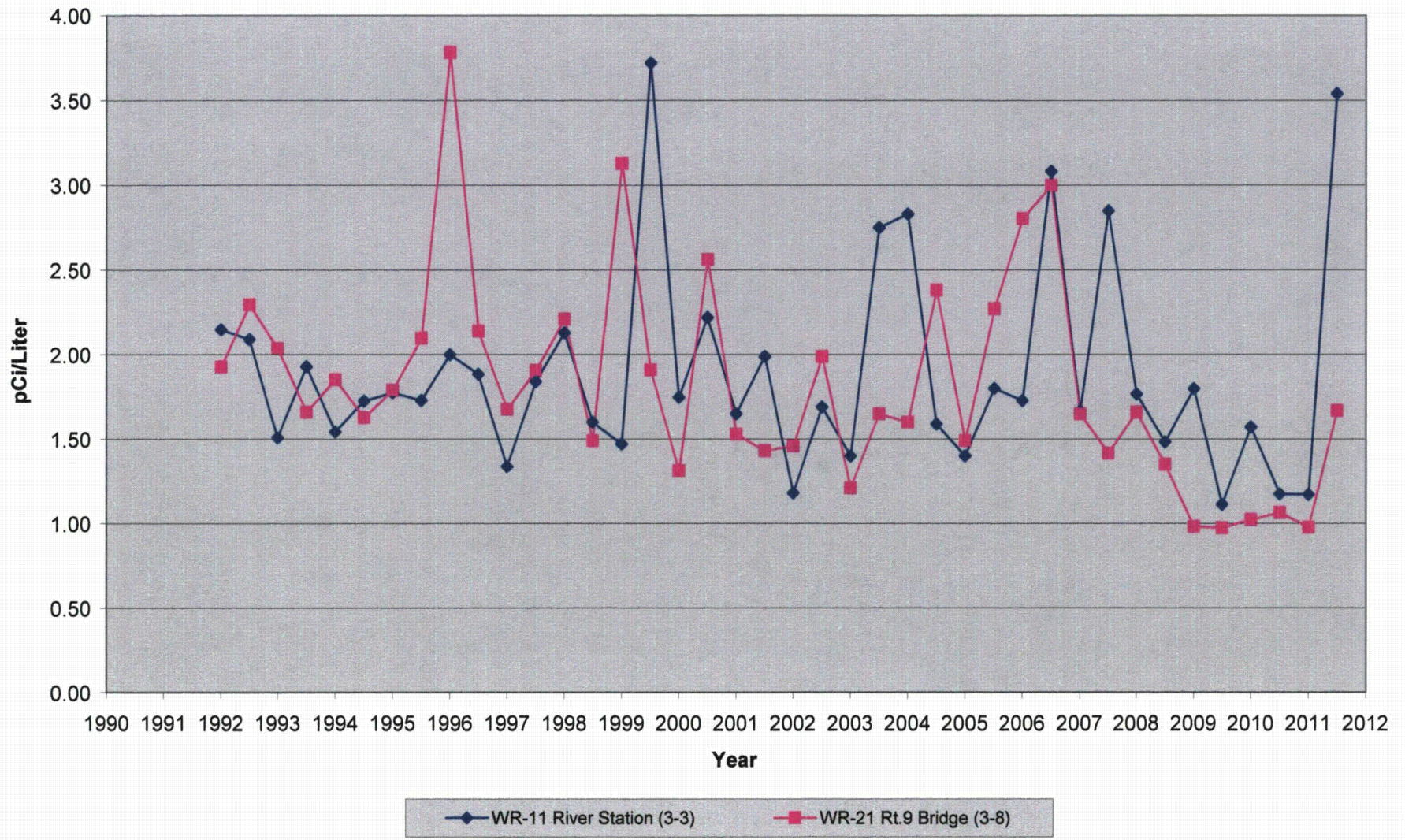


Figure 6.7 - Gross Beta Measurements of Air Particulate Filters



**Figure 6.8 - Gross Beta Measurements on River Water Semi-Annual Average Concentration**



**Figure 6.9 - Gross Beta Measurements on Ground Water Semi-Annual Average Concentrations**

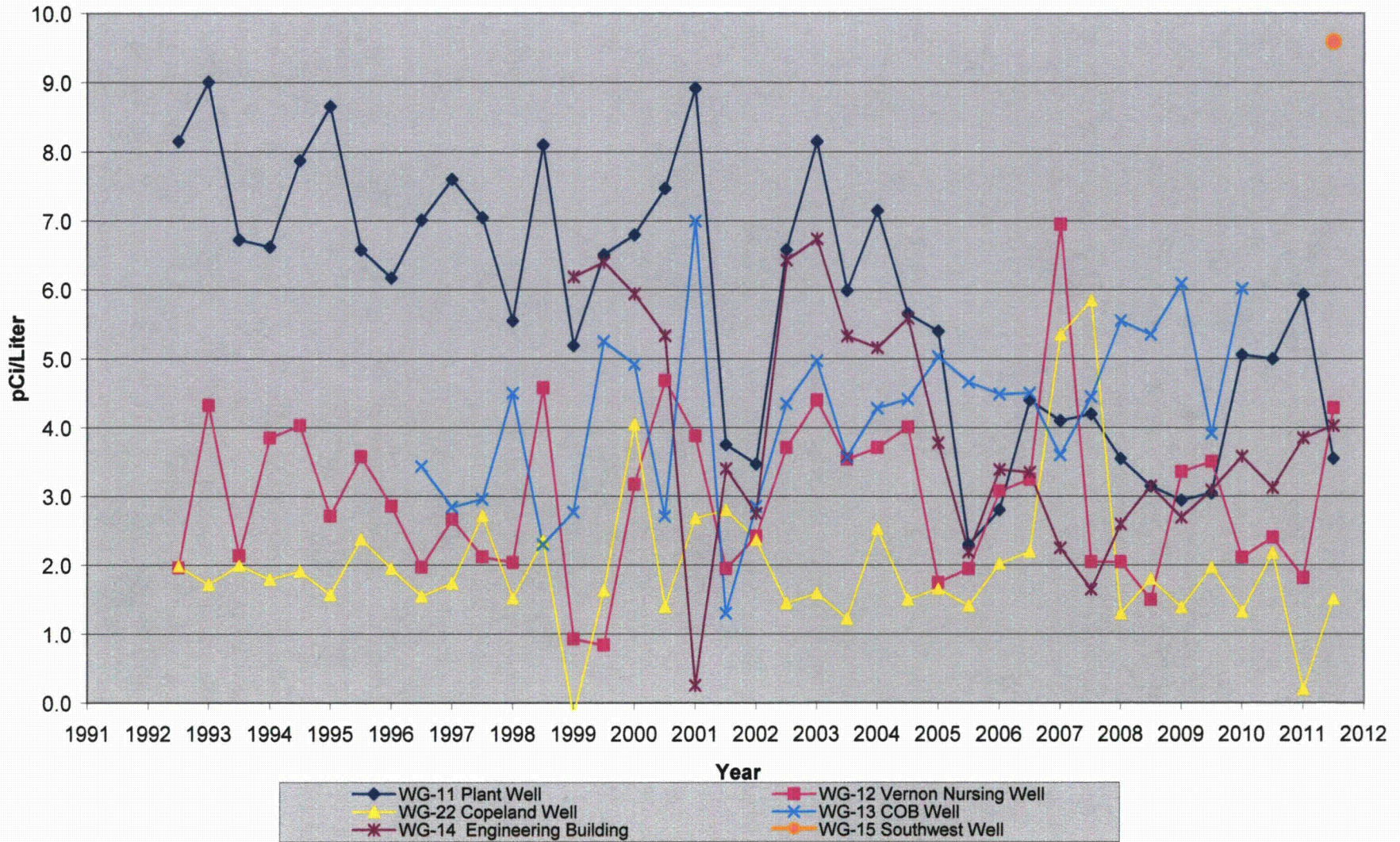


Figure 6.10 - Cesium 137 in Milk - Annual Average Concentration

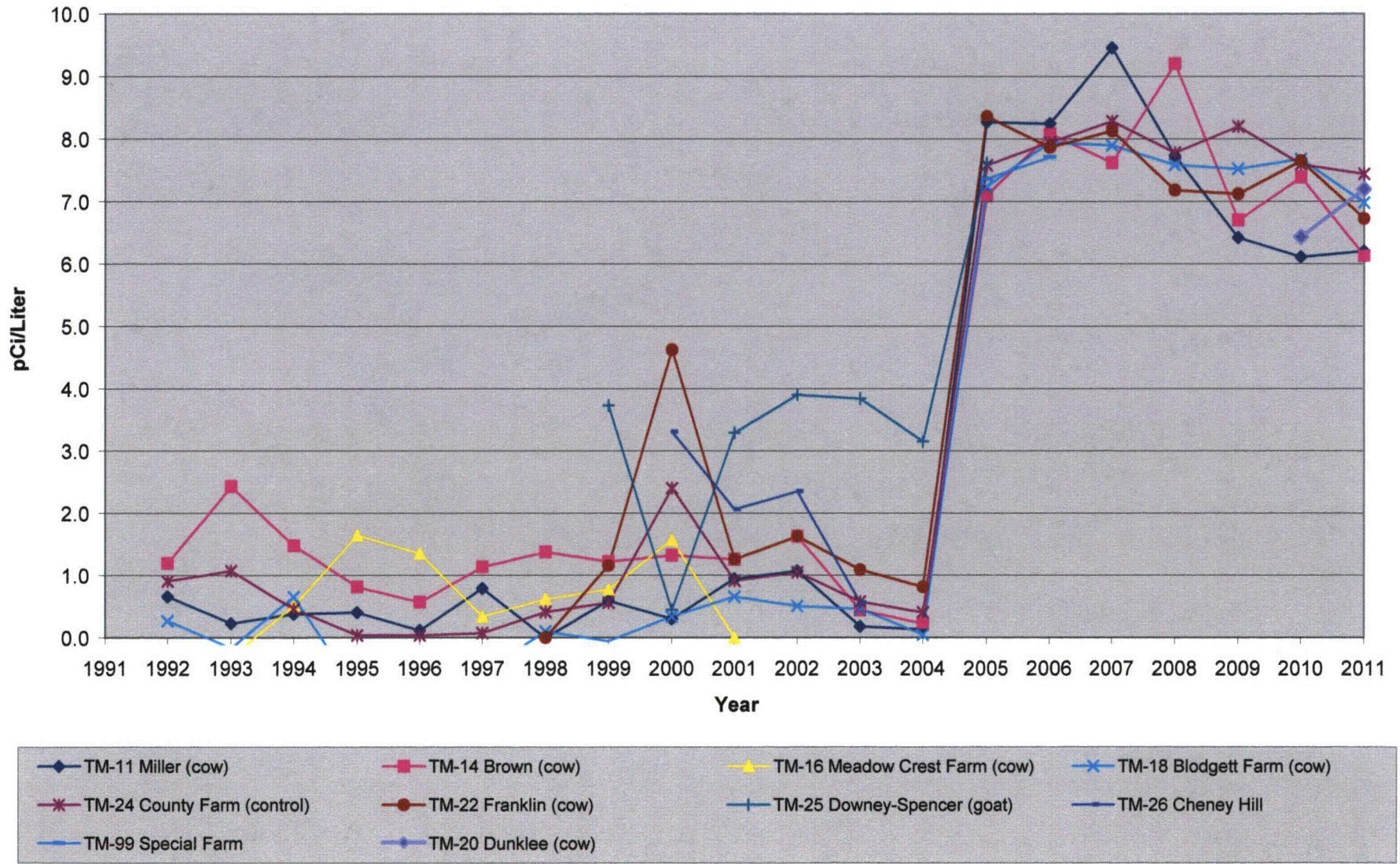




Figure 6.11 - Strontium 90 in Milk - Annual Average Concentrations

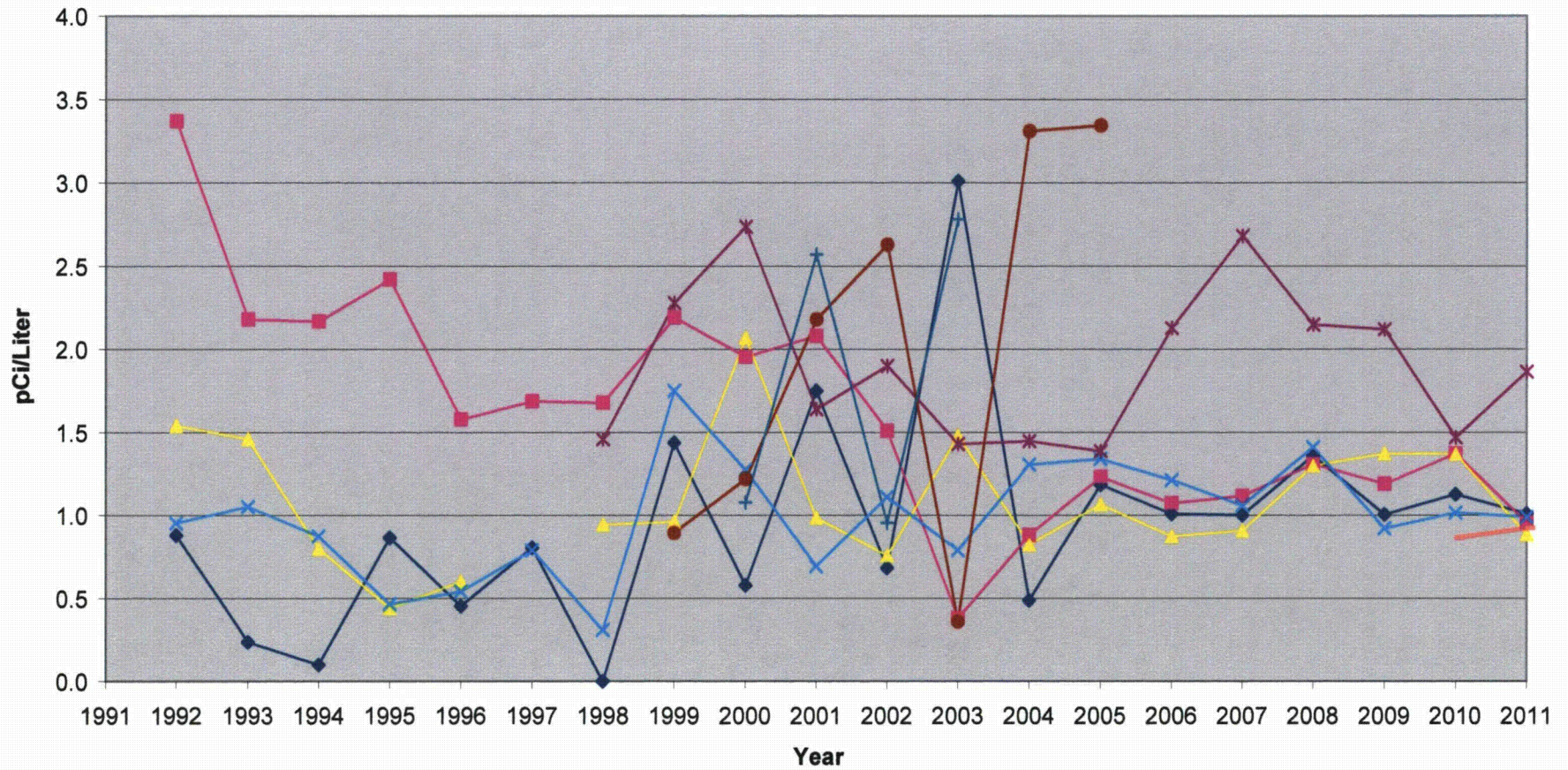


Figure 6.12 - Cesium 137 in Fish - Annual Average Concentrations

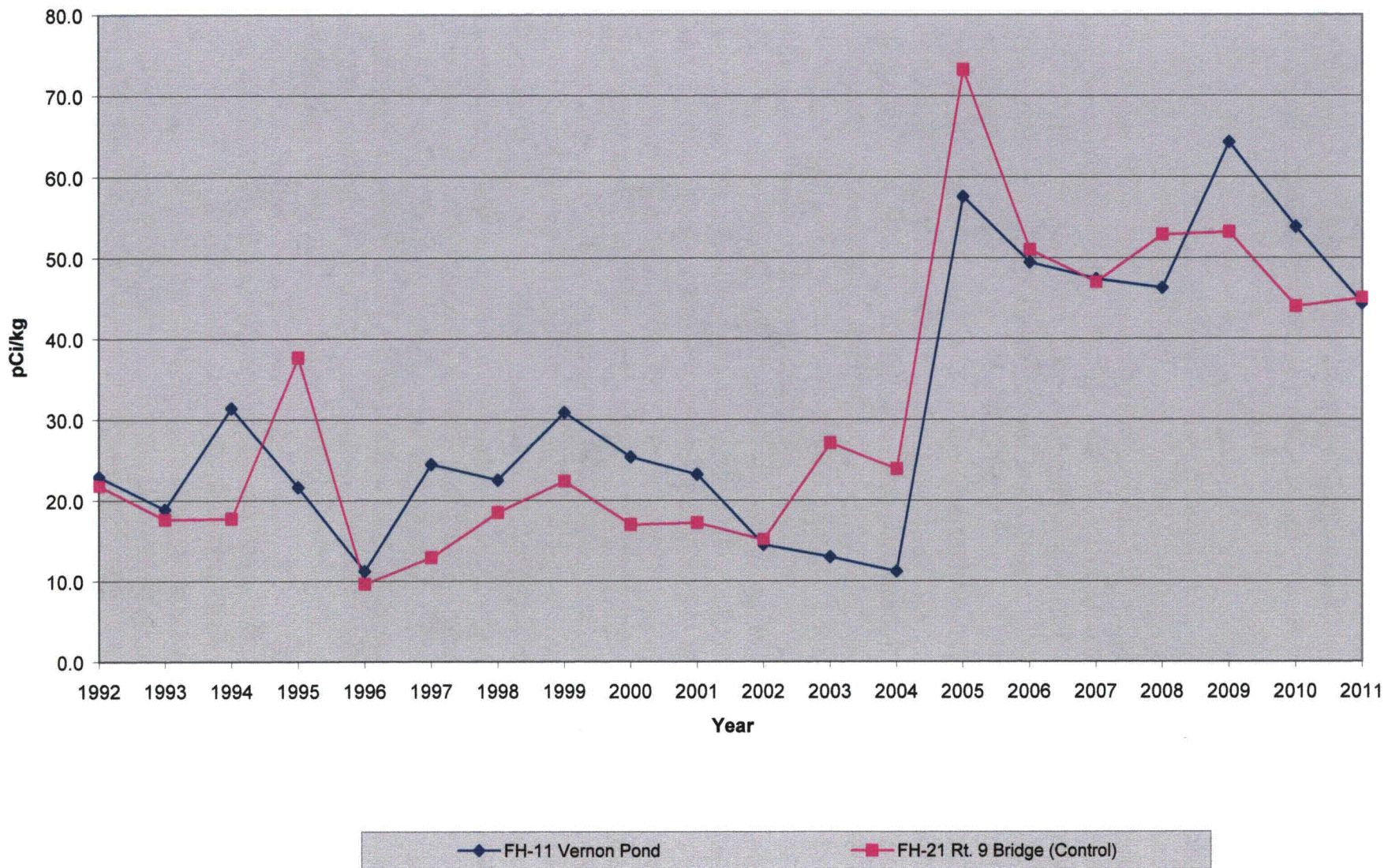


Figure 6.13 - Average Exposure Rate at Inner Ring, Outer Ring and Control TLDs

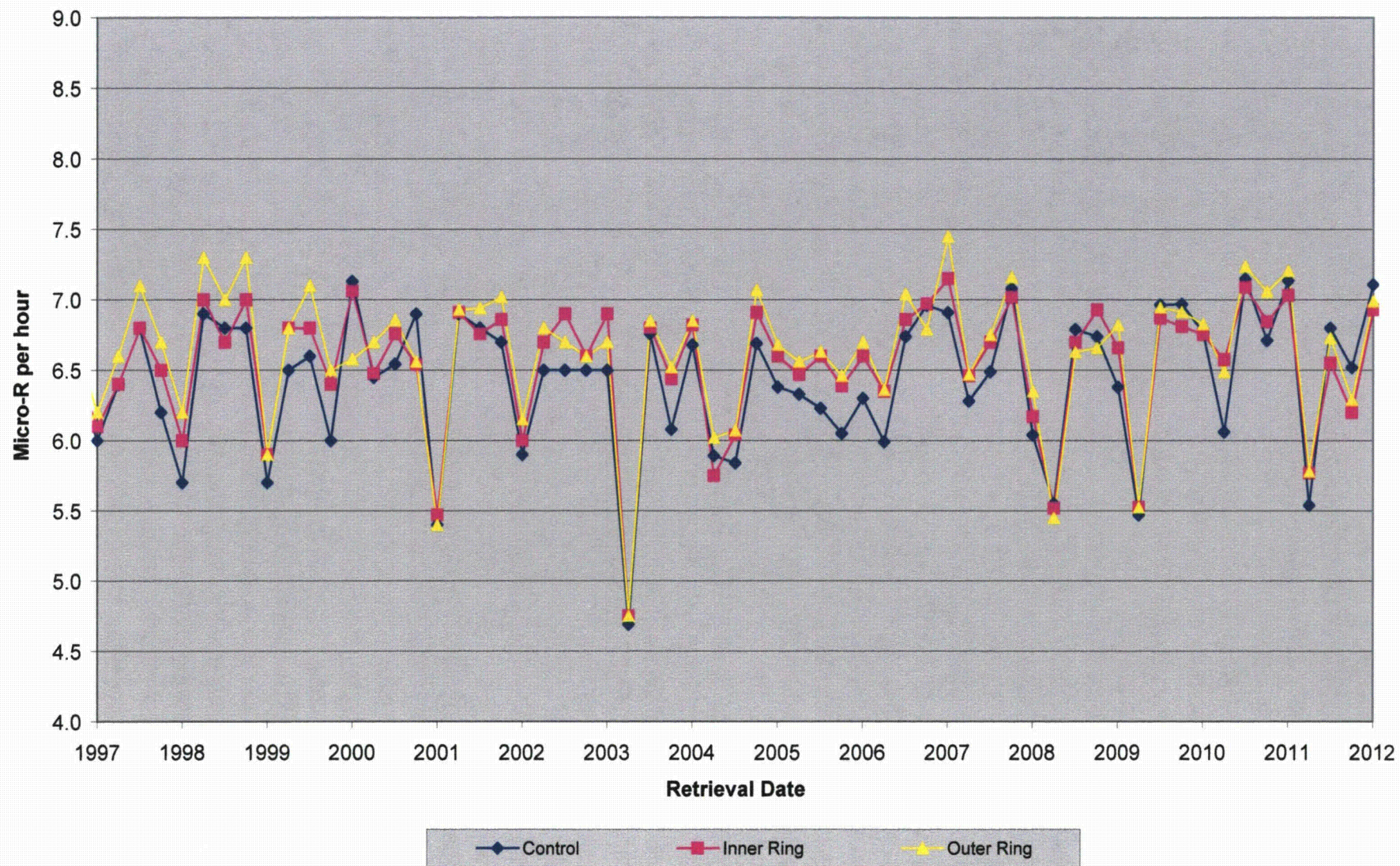


Figure 6.14 - Exposure Rate at Indicator TLDs, DR01-03

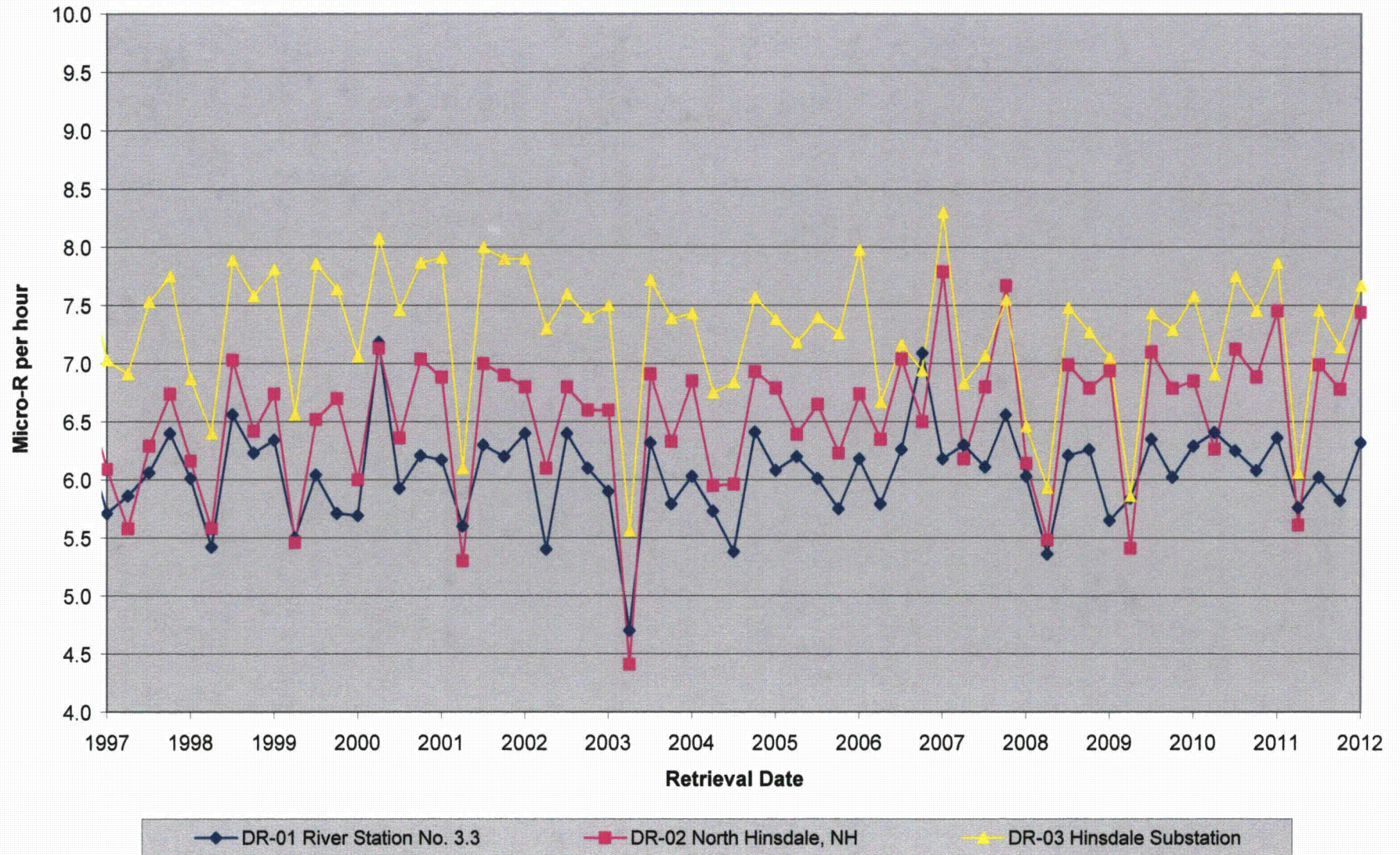


Figure 6.15 - Exposure Rate at Indicator TLDs, DR06 & DR-50

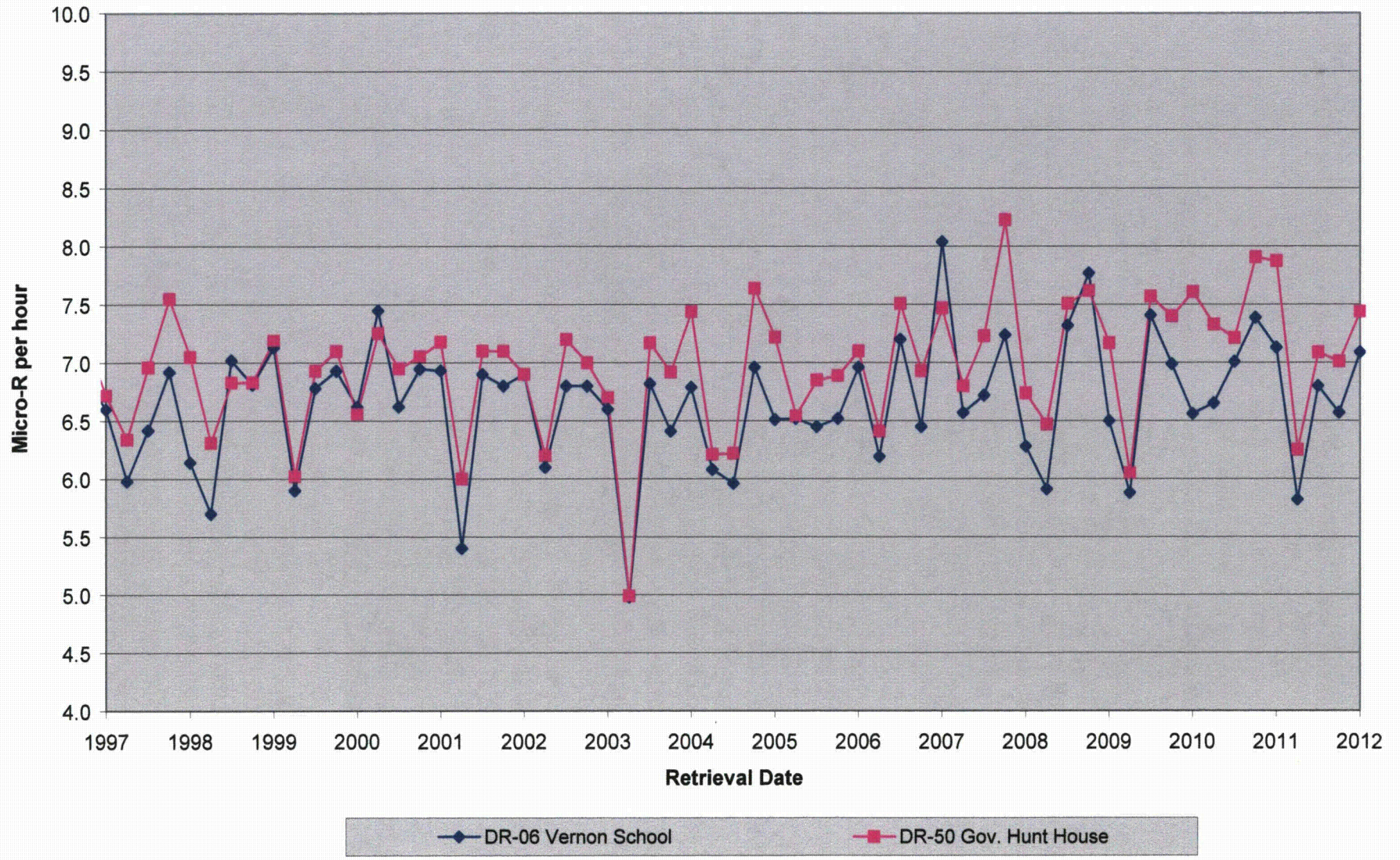


Figure 6.16 - Exposure Rate at Site Boundary TLDs DR07, 08, 41 & 42

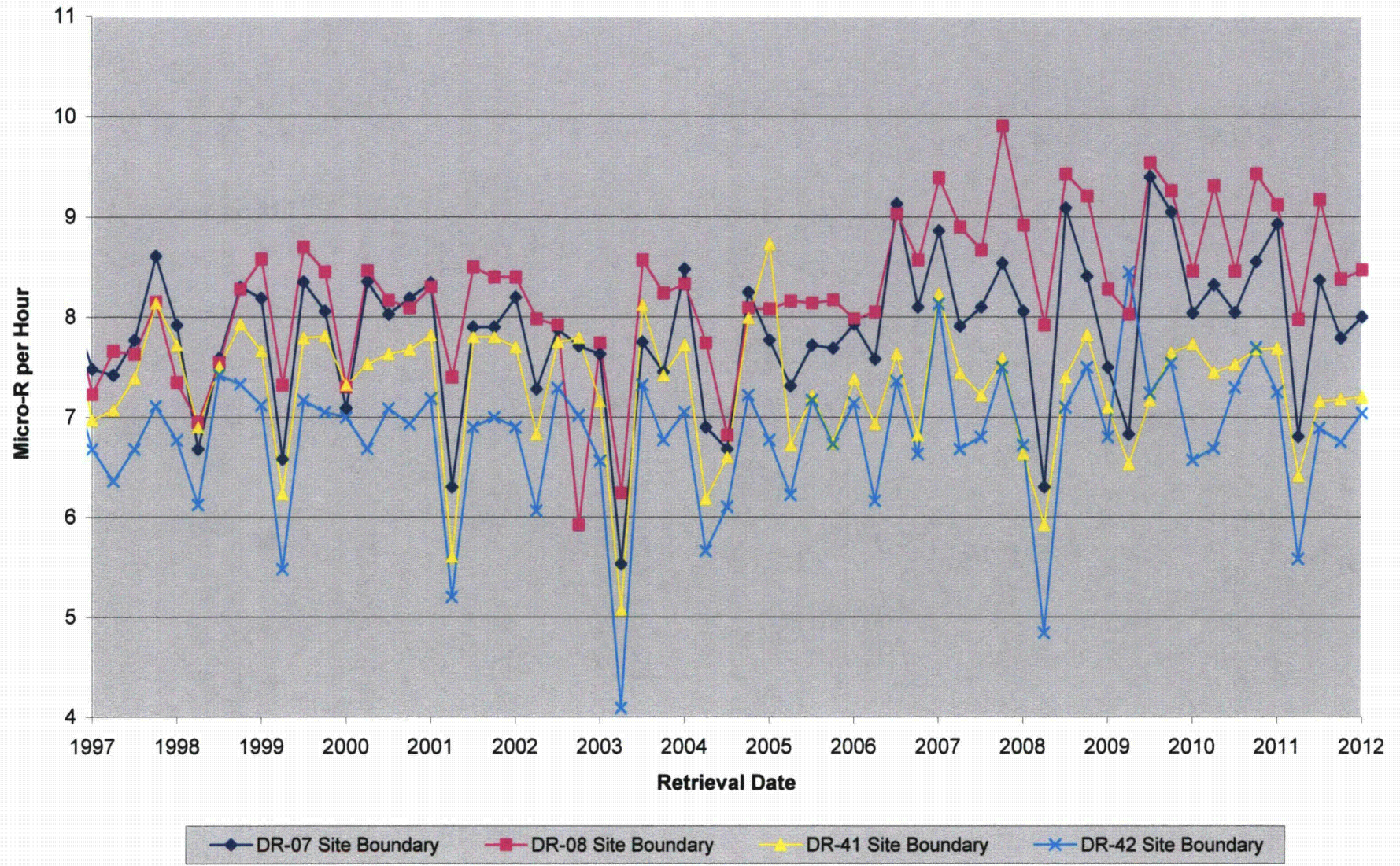


Figure 6.17 - Exposure Rate at Site Boundary TLDs - DR43 thru 46

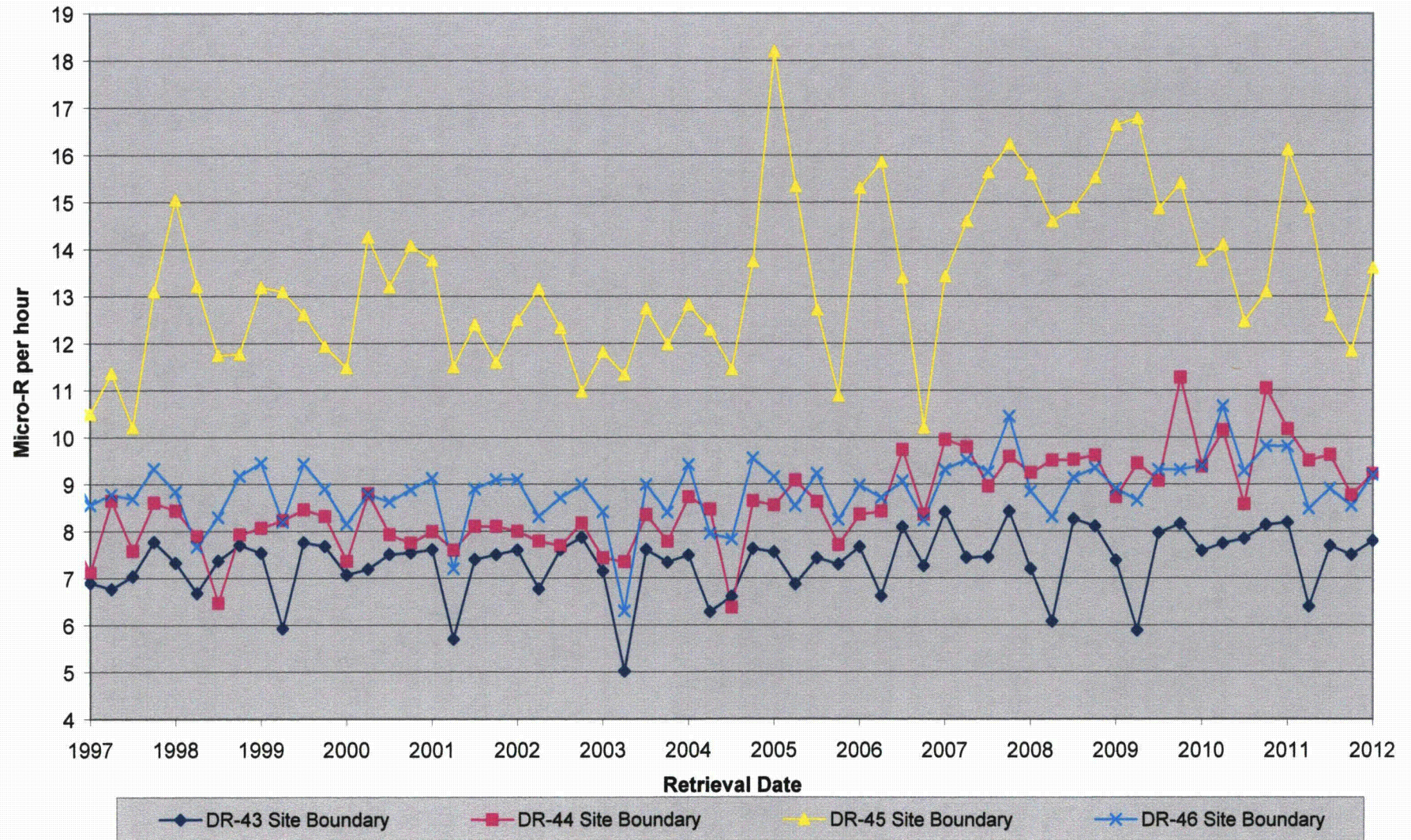


Figure 6.18 - Exposure Rate at Site Boundary TLDs DR47-49 & 51-53

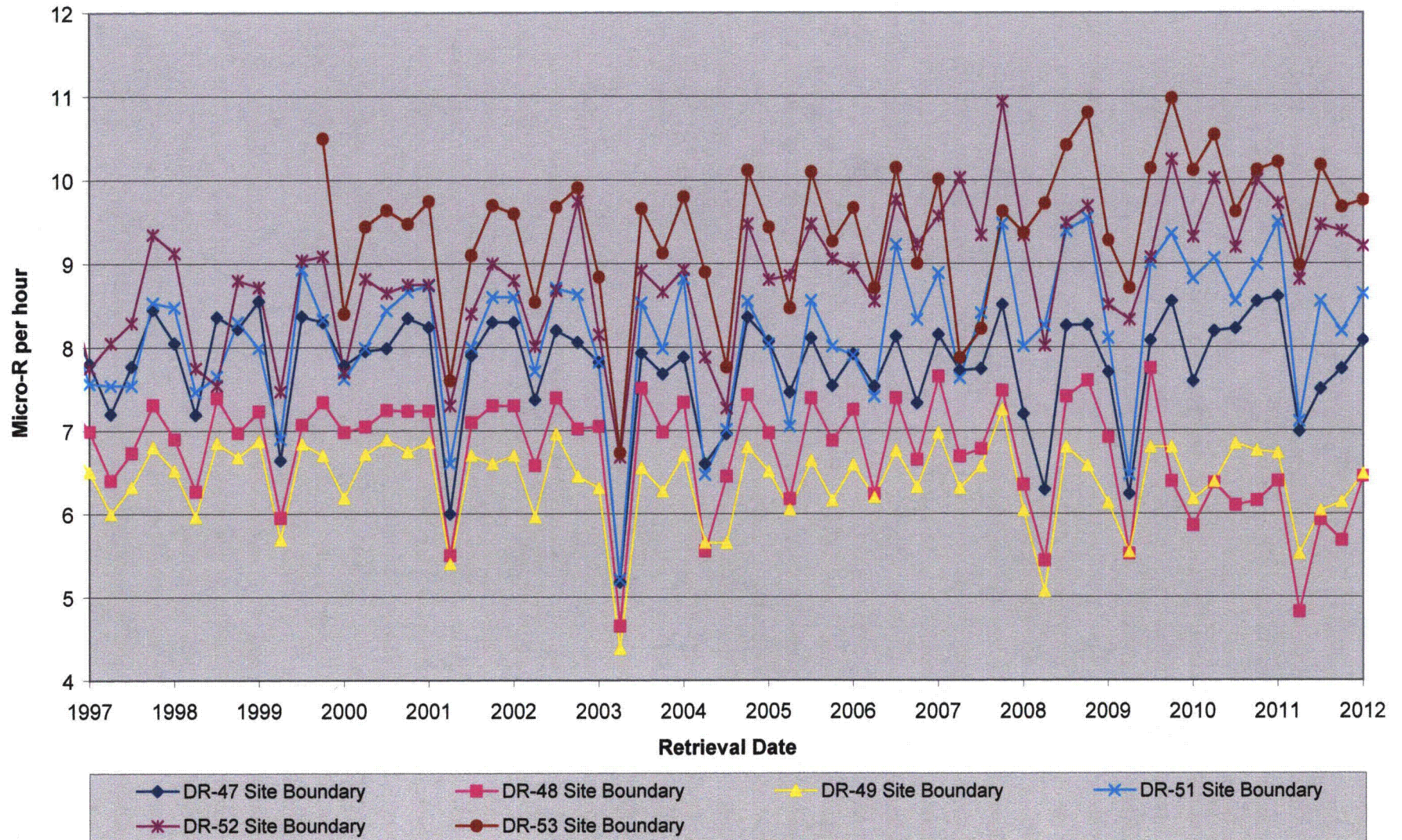




Figure 6.19 - Exposure Rate at Inner Ring TLDs DR09, 11, 13 & 15

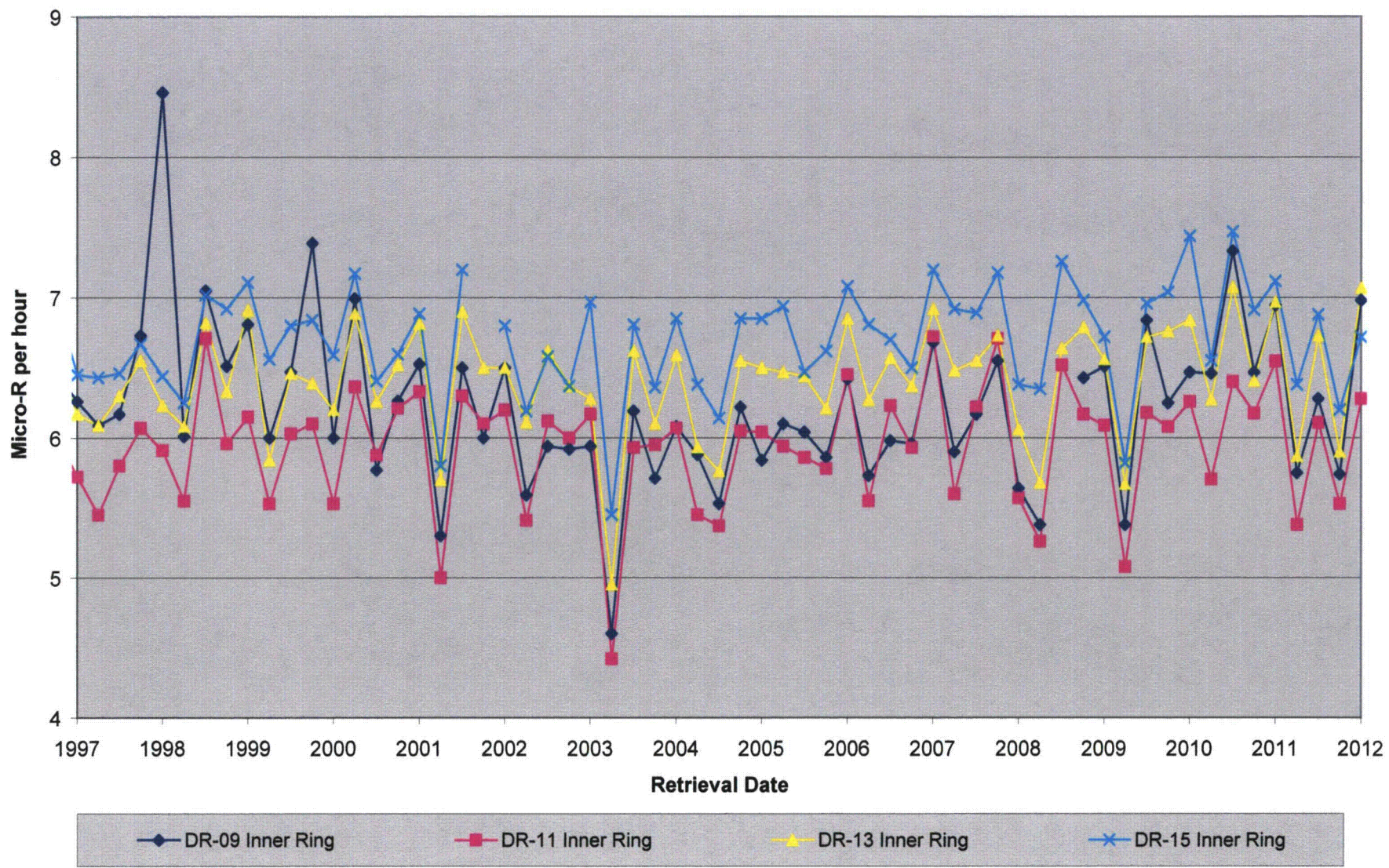


Figure 6.20 - Exposure Rate at Inner Ring TLDs DR17, 19, 21 & 23

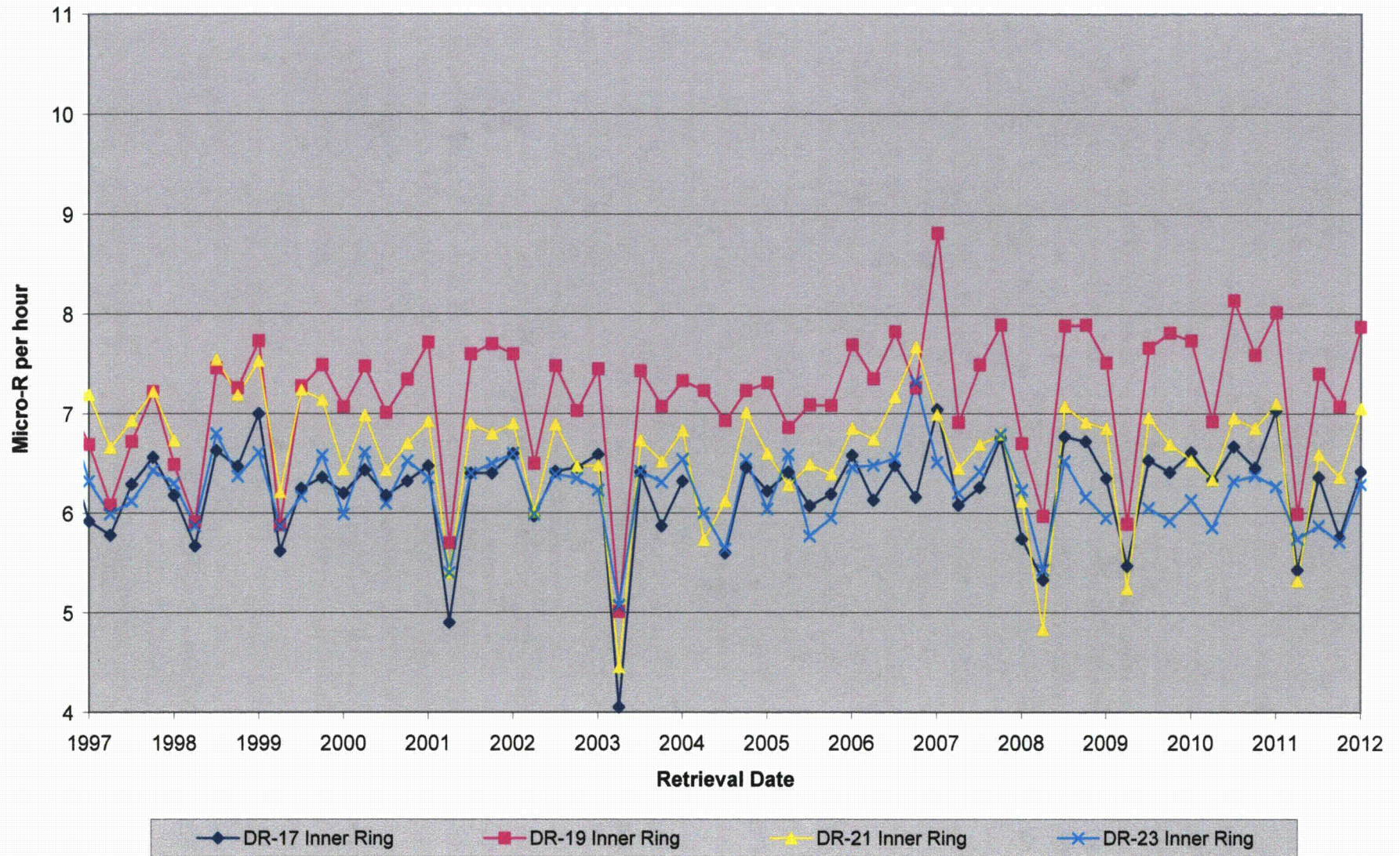


Figure 6.21 - Exposure Rate at Inner Ring TLDs DR25, 27, 29 & 31

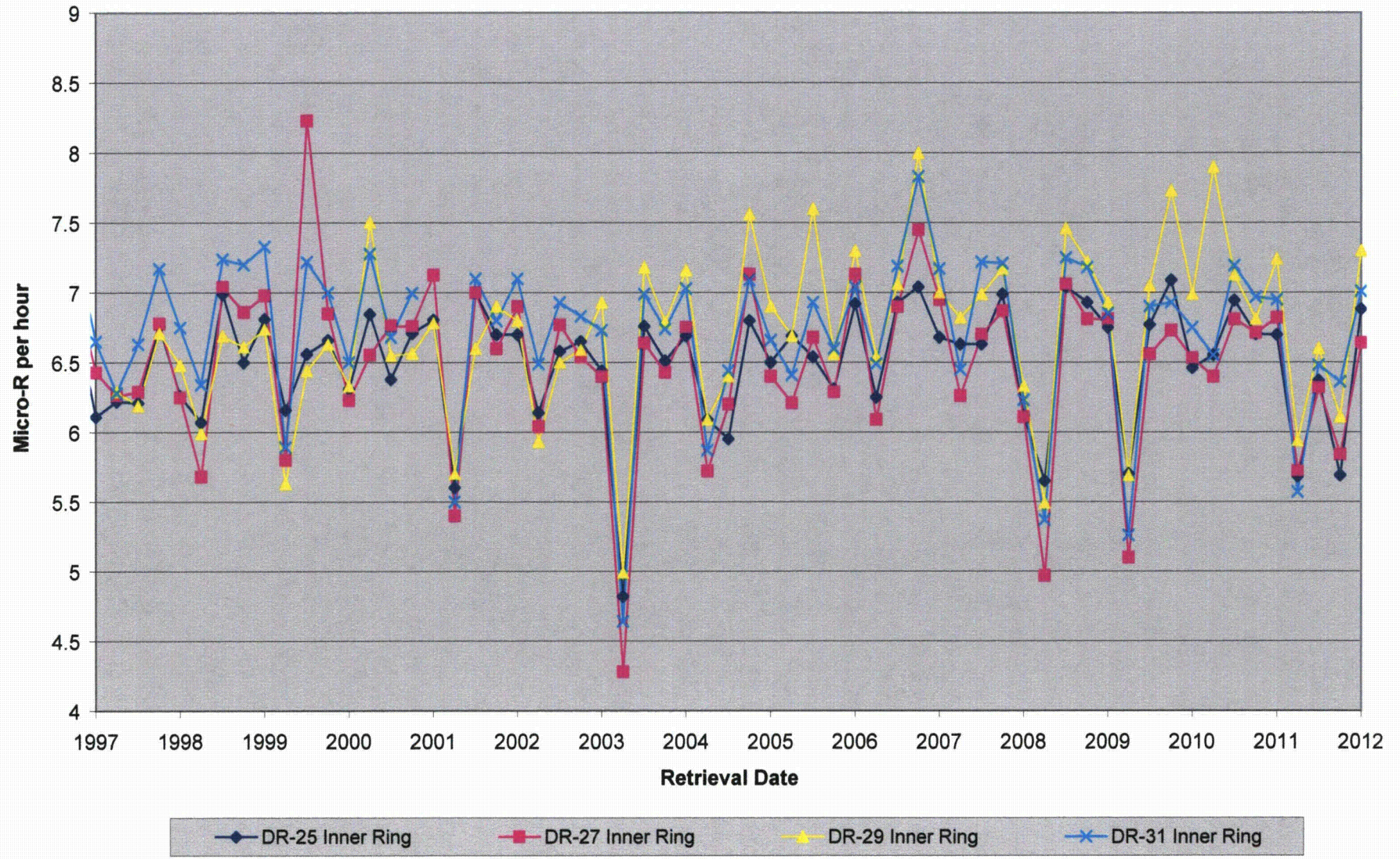


Figure 6.22 - Exposure Rate at Inner Ring TLDs DR33, 35, 37 & 39

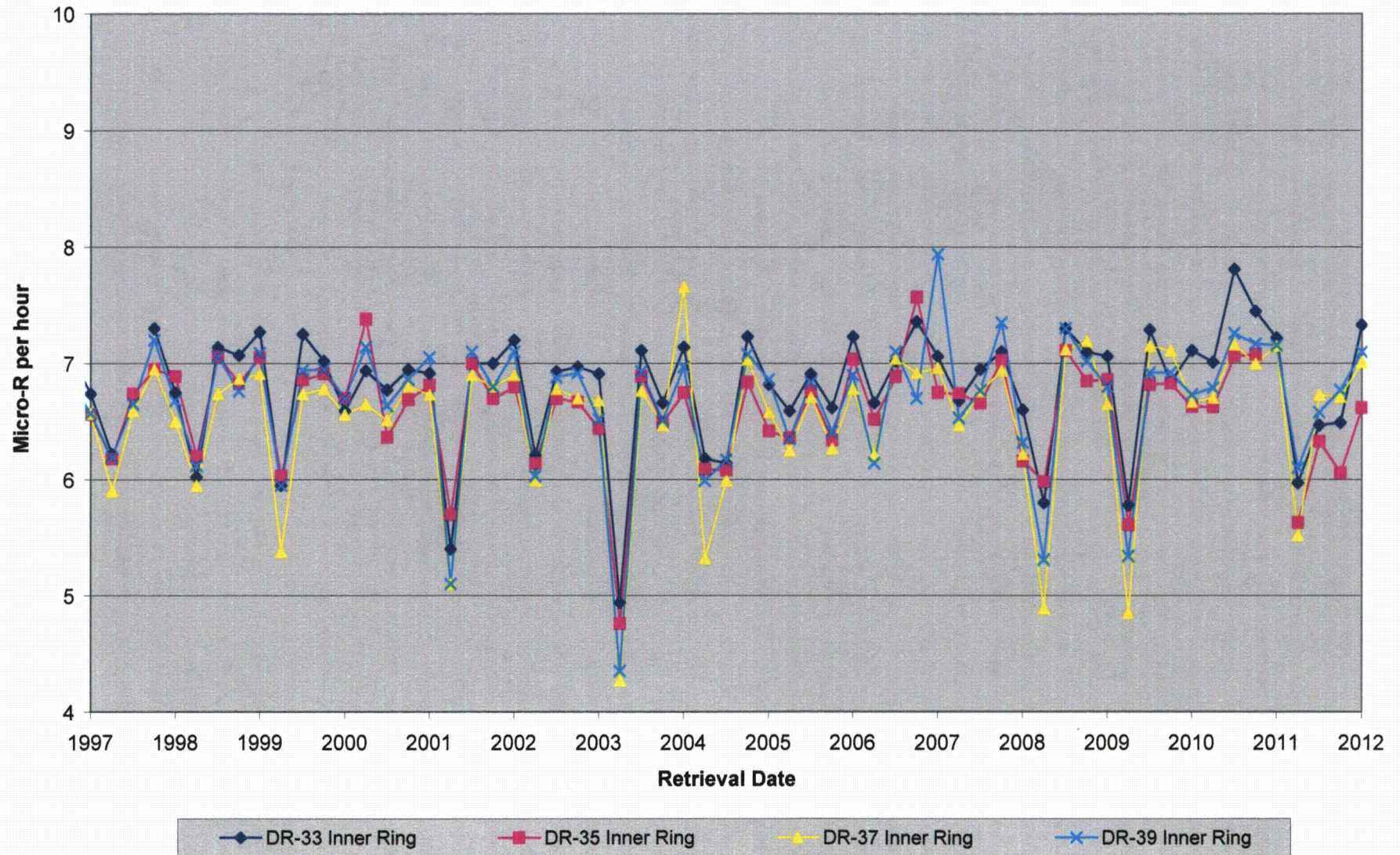


Figure 6.23 - Exposure Rate at Outer Ring TLDs DR10, 12, 14 & 16

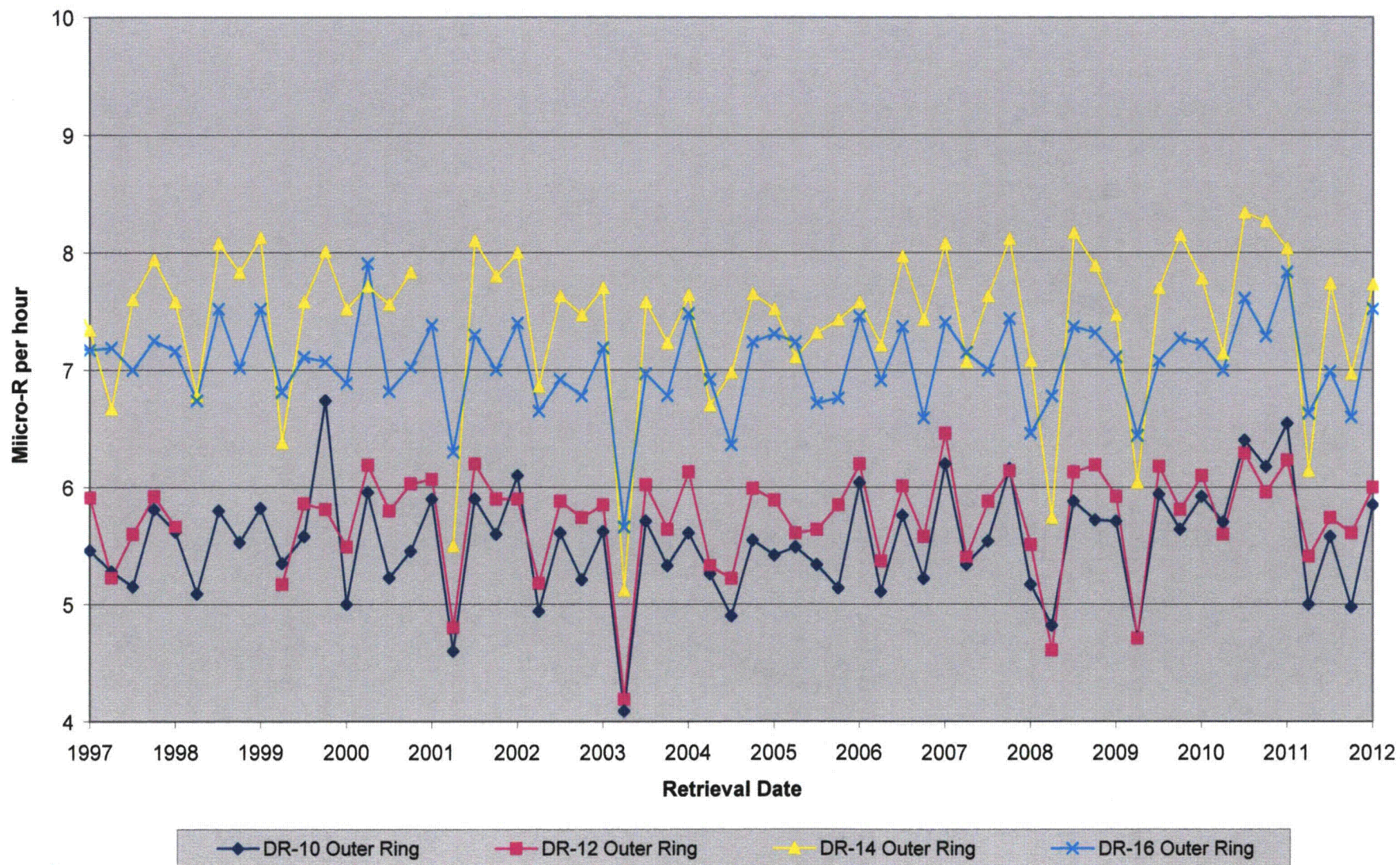


Figure 6.24 - Exposure Rate at Outer Ring TLDs DR18, 20, 22 & 24

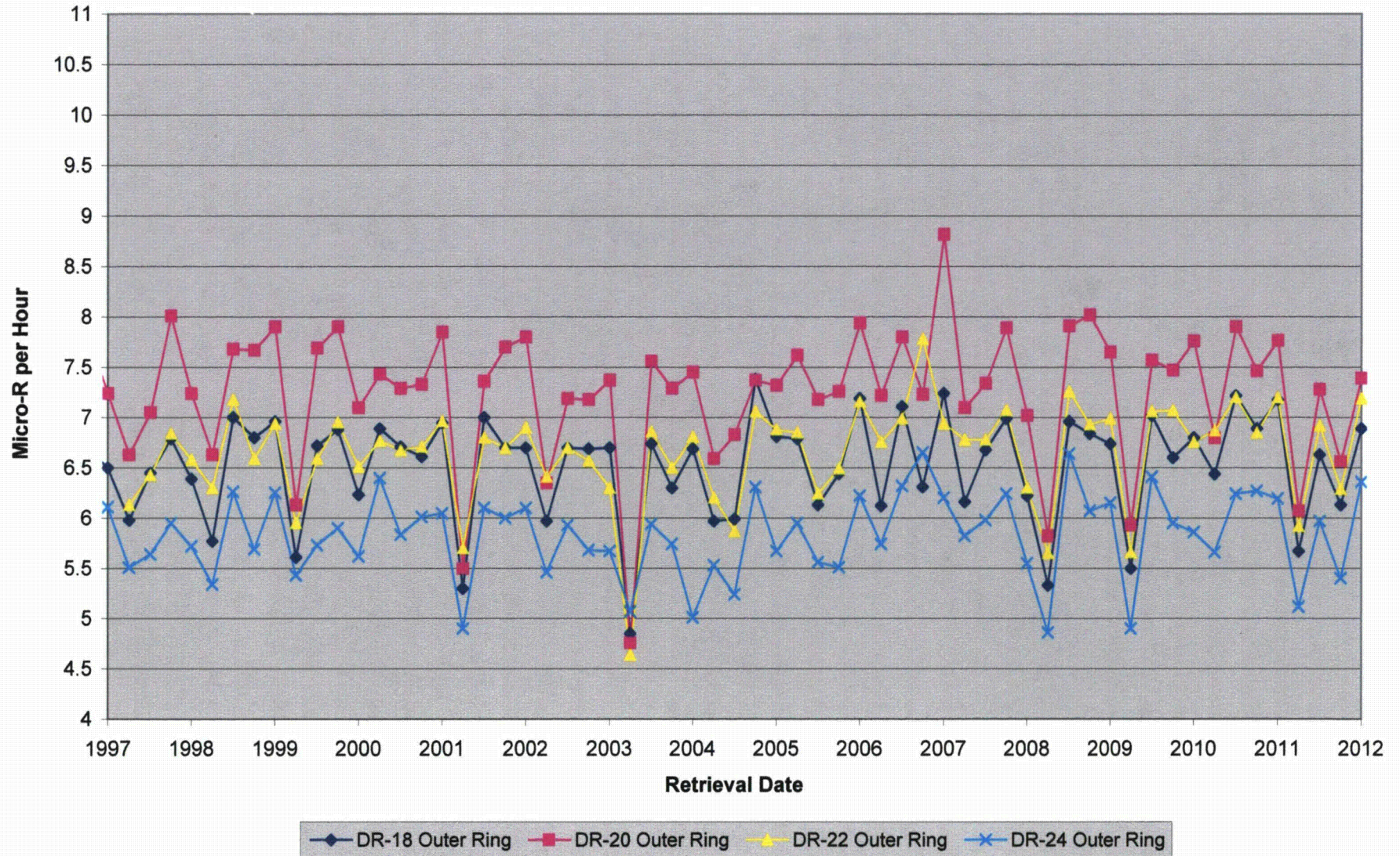


Figure 6.25 - Exposure Rate at Outer Ring TLDs DR26, 28, 30 & 32

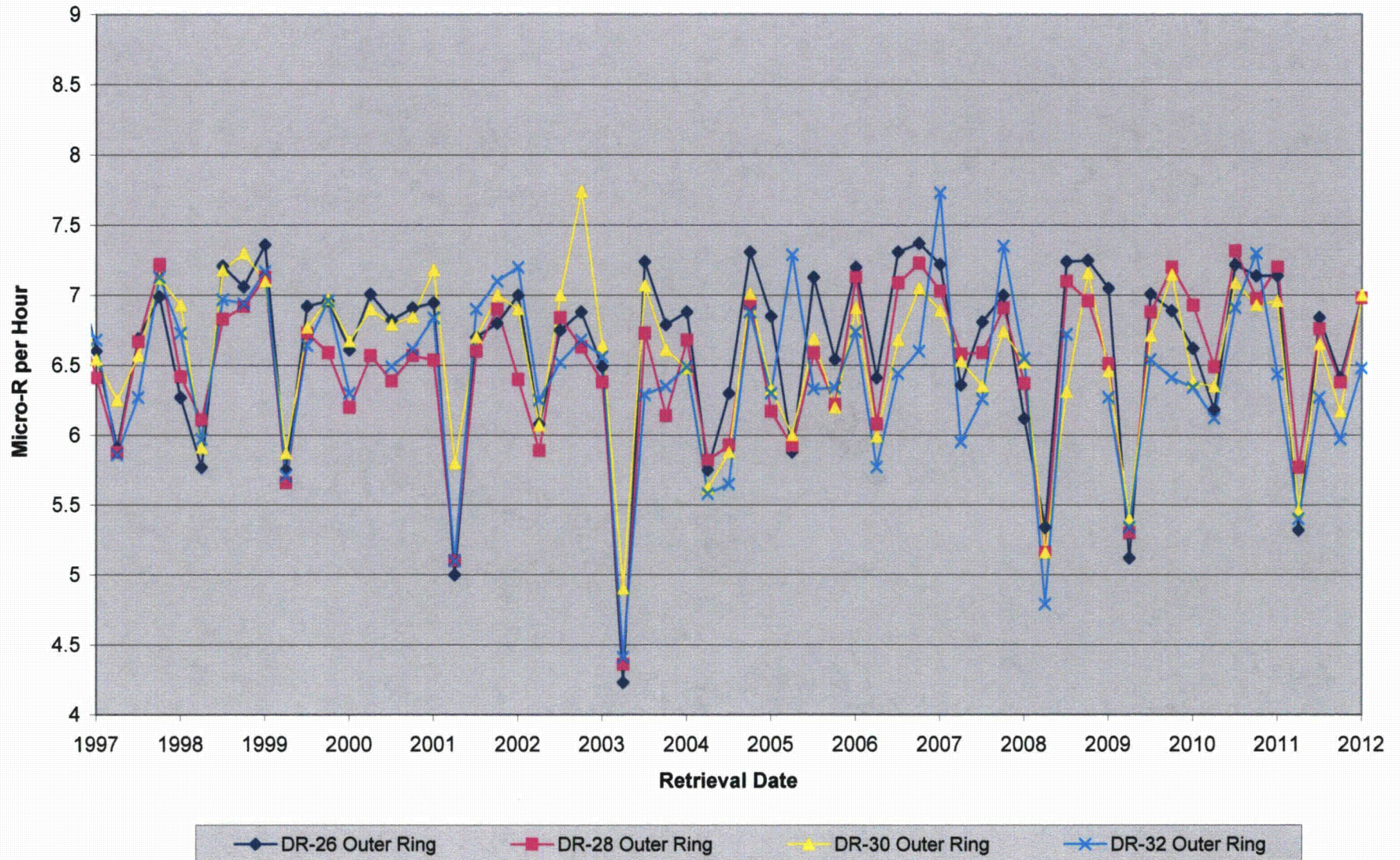


Figure 6.26 - Exposure Rate at Outer Ring TLDs DR 34, 36, 38 & 40

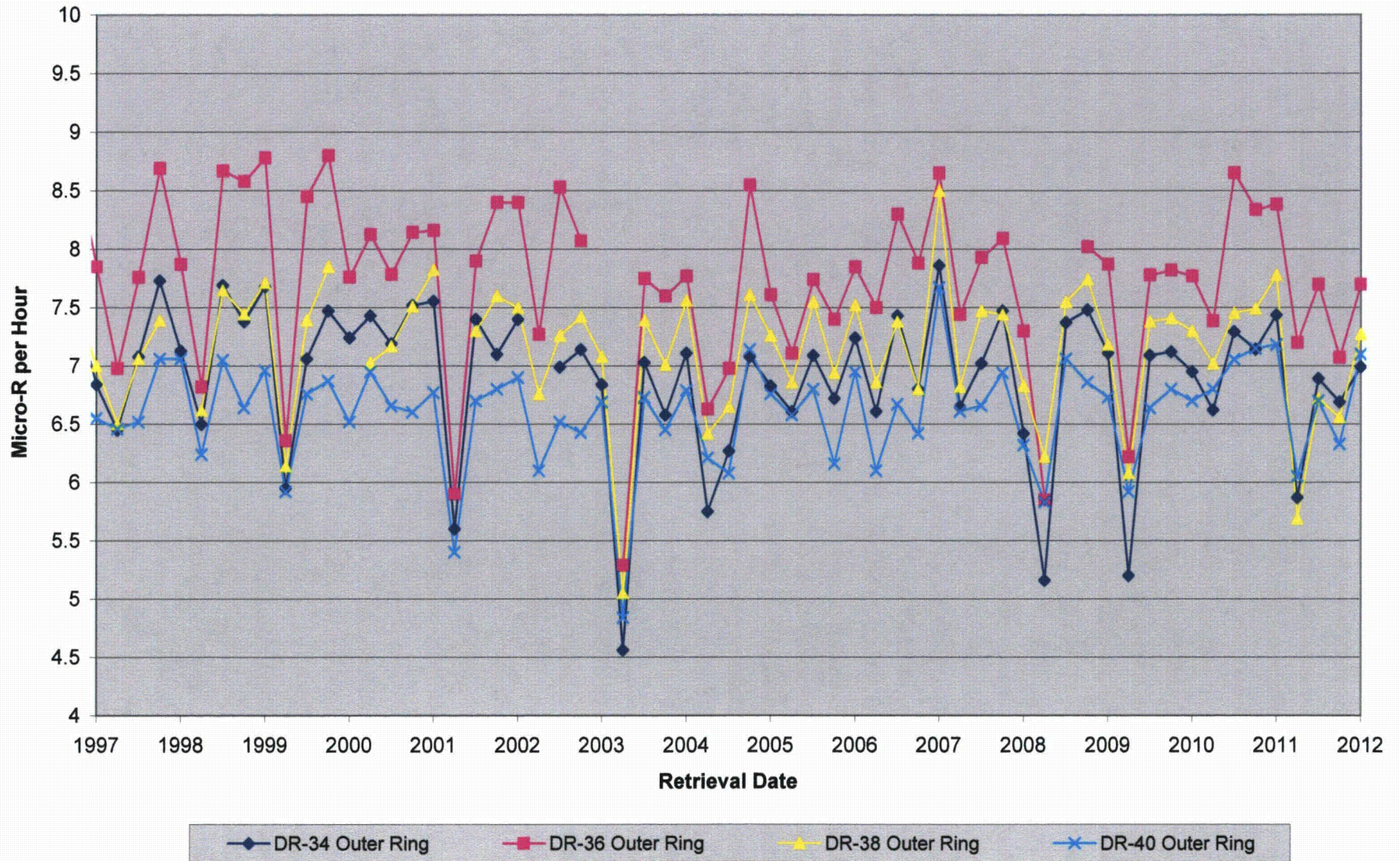
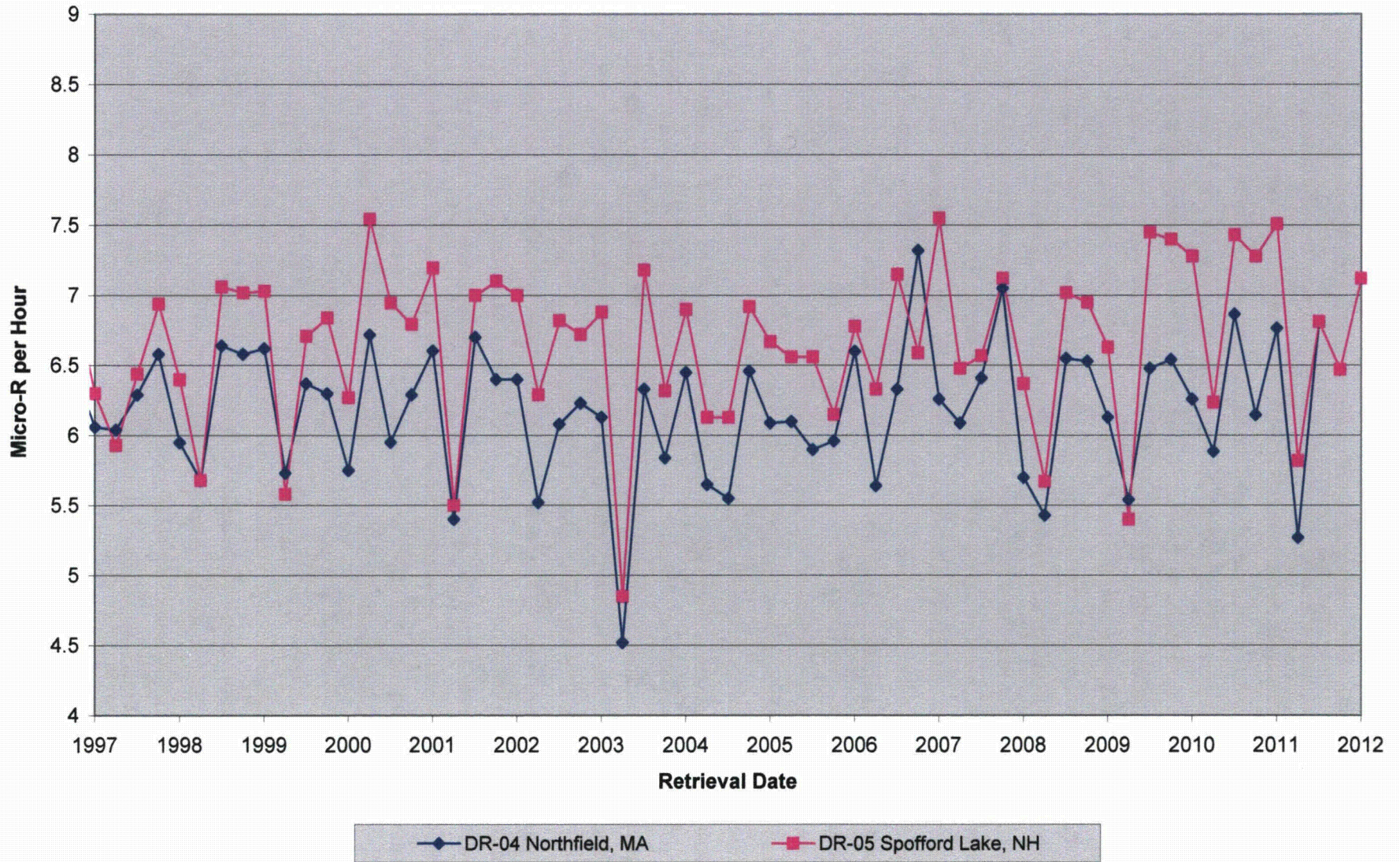




Figure 6.27 - Exposure Rate at Control TLDs DR04 & 05



## **7 QUALITY ASSURANCE PROGRAMS**

### **7.1 Environmental Dosimetry Company**

The TLD systems at the Environmental Dosimetry Company (EDC) are calibrated and operated to ensure consistent and accurate evaluation of TLDs. The quality of the dosimetric results reported to EDC clients is ensured by in-house performance testing and independent performance testing by EDC clients, and both internal and client directed program assessments.

The purpose of the dosimetry quality assurance program at EDC is to provide performance documentation of the routine processing of EDC dosimeters. Performance testing provides a statistical measure of the bias and precision of dosimetry processing against a reliable standard, which in turn points out any trends or performance changes. Two programs are described below.

#### **7.1.1 QC Program**

Dosimetry quality control tests are performed on EDC Panasonic 814 Environmental dosimeters. These tests include: (1) the in-house testing program coordinated by the EDC QA Officer and (2) independent test perform by EDC clients. In-house test are performed using six pairs of 814 dosimeters, a pair is reported as an individual result and six pairs are reported as the mean result. Results of these tests are described in this report.

Excluded from this report are instrumentation checks. Although instrumentation checks represent an important aspect of the quality assurance program, they are not included as process checks in this report. Instrumentation checks represent between 5-10% of the TLDs processed.

#### **7.1.2 QA Program**

An internal assessment of dosimetry activities is conducted annually by the Quality Assurance Officer. The purpose of the assessment is to review procedures, results, materials or components to identify opportunities to improve or enhance processes and/or services.

#### **7.1.3 Environmental TLD Quality Assurance Program**

Results of performance tests conducted are summarized and discussed in the following sections. Summaries of the performance tests for the reporting period are given in Tables 1 through 3.

Table 1 provides a summary of individual dosimeter results evaluated against the EDC internal acceptance criteria for high-energy photons only. During this period, 100% (72/72) of the individual dosimeters, evaluated against these criteria met the tolerance limits for accuracy (+/-15.0%) and 100% (72/72) met the criterion for precision (+/-12.8%).

Table 2 provides the Bias + Standard deviation results for each group (N=6) of dosimeters evaluated against the internal tolerance criteria. Overall, 100% (12/12) of the dosimeter sets evaluated against the internal tolerance performance criteria met these criteria.

Table 3 presents the independent blind spike results for dosimeters processed during this annual period. All results passed the performance acceptance criterion.

**Table 1**  
**Percentage of Individual Analyses that passed EDC Internal Criteria**  
**January – December 2011<sup>(1)(2)</sup>**

Dosimeter Type	Number Tested	% Passed Bias Criteria	% Passed Precision Criteria
Panasonic Environmental	72	100	100

(1) This table summarizes results of tests conducted by EDC.

(2) Environmental Dosimeter results are free in air.

**Table 2**  
**Mean Dosimeter Analyses (N=6)**  
**January – December 2011<sup>(1)(2)</sup>**

Process Date	Mean Bias %	Standard Deviation %	Tolerance Limit +/- 15%
04/22/2011	3.0	1.9	Pass
05/2/2011	8.0	1.4	Pass
05/18/2011	0.2	1.4	Pass
07/21/2011	6.2	0.6	Pass
08/5/2011	5.4	0.6	Pass
08/16/2011	7.0	1.1	Pass
10/14/2011	-1.6	1.7	Pass
11/07/2011	0.4	0.8	Pass
01/19/2012	-1.0	1.3	Pass
01/22/2012	-3.1	1.8	Pass
01/29/2012	4.9	1.2	Pass
02/09/2012	-1.6	1.5	Pass

(1) This table summarizes results of tests conducted by EDC for TLDs issued in 2011

(2) Environmental Dosimeter results are free in air.

**Table 3**  
**Summary of Independent Dosimeter Testing**  
**January-December 2011<sup>(1)(2)</sup>**

Issuance Period	Client	Mean Bias %	Standard Deviation %	Pass/Fail
1 <sup>st</sup> Qtr. 2011	Millstone	-1.3	1.0	Pass
2 <sup>nd</sup> Qtr. 2011	Millstone	-5.0	1.3	Pass
2 <sup>nd</sup> Qtr. 2011	Seabrook	2.0	1.8	Pass
3 <sup>rd</sup> Qtr. 2011	Millstone	-2.1	2.9	Pass
4 <sup>th</sup> Qtr. 2011	Millstone	7.8	2.8	Pass
4 <sup>th</sup> Qtr. 2011	Seabrook	1.7	2.0	Pass

(1) Performance criteria are +/- 30%.

(2) Blind spike irradiations using Cs-137

## **7.2 Teledyne Brown Engineering Laboratory –Environmental Services (TBE-ES)**

### **7.2.1 Operational Quality Control Scope**

#### **7.2.1.1 Inter-laboratory**

The TBE-ES Laboratory QC Program is designed to monitor the quality of analytical processing associated with environmental, effluent (10CFR Part 50), and waste characterization (10CFR Part 61) samples.

Quality Control of environmental radioanalyses involves the internal process control program and independent third party programs administered by Analytics, Inc and Environmental Resource Associates (ERA).

TBE-ES participates in the Quality Assessment Program (QAP) administered by the Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP). The MAPEP is a set of performance evaluation samples (e.g. water, soil, air filters, etc.) designed to evaluate the ability and quality of analytical facilities performing sample measurements which contain hazardous and radioactive (mixed) analytes.

Quality Control for radioanalyses during this reporting period was divided among internal process check samples, third party process checks prepared by Analytics, Inc. (which was submitted by users or secured directly by TBE-ES for QC purposes), ERA, and DOE's MAPEP.

#### **7.2.1.2 Intra-laboratory**

The internal Quality Control program is designed to include QC functions such as instrumentation checks (to ensure proper instrument response), blank samples (to which no analyte radioactivity has been added), instrumentation backgrounds, duplicates, as well as overall staff qualification analyses and process controls. Both process control and qualification analyses samples seek to mimic the media type of those samples submitted for analyses by the various laboratory clients. These process controls (or process checks) are either actual samples submitted in duplicate in order to evaluate the accuracy of laboratory measurements, or blank samples which have been "spiked" with a known quantity of a radioisotope that is of interest to laboratory clients. These QC samples, which represent either "single" or "double-blind" unknowns, are intended to evaluate the entire radiochemical and radiometric process.

To provide direction and consistency in administering the quality assurance program, TBE-ES has developed and follows an annual quality control and audit assessment schedule. The plan describes the scheduled frequency and scope of Quality Assurance and Control considered necessary for an adequate QA/QC program conducted throughout the year. The magnitude of the process control program combines both internal and external sources targeted at 5% of the routine sample analysis load.

#### **7.2.1.3 QA Program (Internal and External Audits)**

During each reporting period at least one internal assessment is conducted in accordance with the pre-established TBE-ES Quality Control and Audit Assessment Schedule. In addition, the laboratory may be audited by prospective customers during a pre-contract audit, and/or by existing clients who wish to conduct periodic audits in accordance with their contractual

arrangements. The Nuclear Utilities Procurement Issues Committee (NUPIC) conducts audits of TBE-ES as a function of a Utilities Radiological Environment Measurement Program (REMP).

TBE-ES Laboratory-Knoxville has successfully completed the New York State Department of Health's Environmental Laboratory Approval Program (NELAP), Nuclear Fuel Services, Manufacturing Sciences Corporation and State of Tennessee audits. These audits were each a comprehensive review of TBE-ES's Quality and Technical programs used to assess the laboratory's ability to produce accurate and defensible data. No significant deficiencies, which would adversely impact data quality, were identified during any of these audits. Administrative findings identified during these inspections are usually addressed promptly, according to client specifications.

## **7.2.2 Analytical Services Quality Control Synopsis**

### **7.2.2.1 Results Summary**

#### **7.2.2.1.1 Environmental Services Quality Control**

During this annual reporting period, twenty-seven nuclides associated with six media types were analyzed by means of the laboratory's internal process control, Analytics, ERA and DOE quality control programs. Media types representative of client company analyses performed during this reporting period were selected. The results for these programs are presented in Table 7.2. Below is a synopsis of the media types evaluated:

- Air Filter
- Charcoal (Air Iodine)
- Milk
- Soil
- Vegetation
- Water

#### **7.2.2.1.2 Analytics Environmental Cross-Check Program**

Thirteen nuclides were evaluated during this reporting period. All but one of the environmental samples performed were within the acceptable criteria. The Analytics March Cr-51 in milk was higher than the known value, resulting in a found to known ratio of 1.34. There was a slightly high bias in all the gamma activities for that milk sample. The June Analytics milk sample did not show a high bias. No further action was required.

#### **7.2.2.1.3 Summary of Participation in the Department of Energy (DOE) Monitoring Program**

TBE-ES participated in the semi annual Mixed Analyte Performance Evaluation Program (MAPEP) for liquid, air particulate, soil, and vegetation analyses (MAPEP-Series 22 and 23). During this reporting period, 18 nuclides were evaluated. All but four of the 18 environmental analytical results were within the acceptable criteria. In one air particulate sample, the gross alpha result was lower than the known value. The air particulate filter had been counted on the wrong side.

Sr-90 in soil, air particulate and vegetation were not reported and were evaluated as failed by MAPEP.

#### **7.2.2.1.5 Summary of participation in the ERA Program**

During this reporting period, 13 nuclides were analyzed under ERA criteria. All but two of the environmental analytical results were acceptable. The gross alpha in water result exceeded the upper control limit. The solids on the planchet exceeded 100 mg, which was beyond the range of the efficiency curve.

The Sr-89 in water sample was evaluated as failed with a ratio of 1.16. TBE considers this an acceptable result. No action was taken.

#### **7.2.2.2 Intra-Laboratory Process Control Program**

The TBE-ES Laboratory's internal process control program evaluated 5731 individual samples.

##### **7.2.2.2.1 Spikes**

All but two of the 1562 environmental spikes were analyzed with statistically appropriate activity reported for each spike. The affected work orders were reanalyzed or a case narrative documented the reason the sample could not be reanalyzed.

##### **7.2.2.2.2 Analytical Blanks**

During this reporting period, all of the 1562 environmental analytical blanks analyzed reported less than MDC.

##### **7.2.2.2.3 Duplicates**

All but one of 2607 duplicate sets analyzed were within acceptable limits. The duplicate set was rerun with acceptable results.

##### **7.2.2.2.4 Non-Conformance Reports**

There were 16 non-conformance reports issued for this reporting period. No ENNVY data was impacted by the non-conformance in each of these cases.

## **7.3 J.A. FITZPATRICK ENVIRONMENTAL LABORATORY - QUALITY ASSURANCE / QUALITY CONTROL PROGRAM**

### **7.3.1. PROGRAM DESCRIPTION**

The Offsite Dose Calculation Manual (ODCM), Part 1, Section 5.3 requires that the licensee participate in an Interlaboratory Comparison Program. The Interlaboratory Comparison Program shall include sample media for which samples are routinely collected and for which comparison samples are commercially available. Participation in an Interlaboratory Comparison Program ensures that independent checks on the precision and accuracy of the measurement of radioactive material in the environmental samples are performed as part of the Quality Assurance Program for environmental monitoring. To fulfill the requirement for an Interlaboratory Comparison Program, the JAF Environmental Laboratory has engaged the services of Eckert & Ziegler Analytics, Incorporated in Atlanta, Georgia.

Analytics supplies sample media as blind sample spikes, which contain certified levels of radioactivity unknown to the analysis laboratory. These samples are prepared and analyzed by the JAF Environmental Laboratory using standard laboratory procedures. Analytics issues a statistical summary report of the results. The JAF Environmental Laboratory uses predetermined acceptance criteria methodology for evaluating the laboratory's performance.

The JAF Environmental Laboratory also analyzes laboratory blanks. The analysis of laboratory blanks provides a means to detect and measure radioactive contamination of analytical samples. The analysis of analytical blanks also provides information on the adequacy of background subtraction. Laboratory blank results are analyzed using control charts.

### 7.3.2 PROGRAM SCHEDULE

<b>SAMPLE MEDIA</b>	<b>LABORATORY ANALYSIS</b>	<b>SAMPLE PROVIDER ECKERT &amp; ZIEGLER ANALYTICS</b>
Water	Gross Beta	3
Water	Tritium	5
Water	I-131	4
Water	Mixed Gamma	4
Air	Gross Beta	3
Air	I-131	4
Air	Mixed Gamma	2
Milk	I-131	3
Milk	Mixed Gamma	3
Soil	Mixed Gamma	1
Vegetation	Mixed Gamma	2
<b>TOTAL SAMPLE INVENTORY</b>		<b>34</b>

### 7.3.3 ACCEPTANCE CRITERIA

Each sample result is evaluated to determine the accuracy and precision of the laboratory's analysis result. The sample evaluation method is discussed below.

#### 7.3.3.1 SAMPLE RESULTS EVALUATION

Samples provided by Analytics are evaluated using what is specified as the NRC method. This method is based on the calculation of the ratio of results reported by the participating laboratory (QC result) to the Vendor Laboratory Known value (reference result).



An Environmental Laboratory analytical result is evaluated using the following calculation:

The value for the error resolution is calculated.

$$\text{The error resolution} = \frac{\text{Reference Result}}{\text{Reference Results Error (1 sigma)}}$$

Using the appropriate row under the Error Resolution column in Table 8.3.1 below, a corresponding Ratio of Agreement interval is given.

The value for the ratio is then calculated.

$$\text{Ratio of Agreement} = \frac{\text{QC Result}}{\text{Reference Result}}$$

If the value falls within the agreement interval, the result is acceptable.

**TABLE 7.3.1**

<b>ERROR RESOLUTION</b>	<b>RATIO OF AGREEMENT</b>
< 4	No Comparison
4 to 7	0.5 to 2.0
8 to 15	0.6 to 1.66
16 to 50	0.75 to 1.33
51 to 200	0.8 to 1.25
>200	0.85 to 1.18

This acceptance test is generally referred to as the "NRC" method. The acceptance criteria is contained in Procedure EN-CY-102. The NRC method generally results in an acceptance range of approximately  $\pm 25\%$  of the Known value when applied to sample results from the Eckert & Ziegler Analytics Interlaboratory Comparison Program. This method is used as the procedurally required assessment method and requires the generation of a deviation from QA/QC program report when results are unacceptable.

### **7.3.4 PROGRAM RESULTS SUMMARY**

The Interlaboratory Comparison Program numerical results are provided on Table 7.2.2.

#### **7.3.4.1 ECKERT & ZIEGLER ANALYTICS QA SAMPLES RESULTS**

Thirty-four QA blind spike samples were analyzed as part of Analytics 2011 Interlaboratory Comparison Program. The following sample media were evaluated as part of the comparison program.

- Air Charcoal Cartridge: I-131
- Air Particulate Filter: Mixed Gamma Emitters, Gross Beta
- Water: I-131, Mixed Gamma Emitters, Tritium, Gross Beta
- Soil: Mixed Gamma Emitters
- Milk: I-131, Mixed Gamma Emitters
- Vegetation: Mixed Gamma Emitters

The JAF Environmental Laboratory performed 133 individual analyses on the 34 QA samples. Of the 133 analyses performed, 133 were in agreement using the NRC acceptance criteria for a 100% agreement ratio.

There were no nonconformities in the 2011 program.

7.3.4.2 NUMERICAL RESULTS TABLES

**TABLE 7.3.2  
INTERLABORATORY INTERCOMPARISON PROGRAM  
Gross Beta Analysis of Air Particulate Filter**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi ±1 sigma			pCi ±1 sigma				
06/16/2011	E7633-05	Filter	GROSS BETA	93.2	±	1.4	85.5	±	1.43	1.08	A
				91.1	±	1.3					
				91.7	±	1.4					
				Mean = 92.0	±	0.8					
				76.1	±	1.2					
06/16/2011	E7618-09	Filter	GROSS BETA	79.3	±	1.3	72.9	±	1.22	1.06	A
				76.4	±	1.2					
				Mean = 77.3	±	0.7					
				101.2	±	2.7					
				99.6	±	2.7					
12/08/2011	E8254-05	Filter	GROSS BETA	100.8	±	2.7	89.6	±	1.5	1.11	A
				99.8	±	2.7					
				98.9	±	2.7					
				97.9	±	2.7					
				105.4	±	2.8					
				108.3	±	2.8					
				99.7	±	2.7					
				91.4	±	2.7					
				91.4	±	2.7					
				98.1	±	2.8					
				Mean = 99.4	±	0.8					

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**Tritium Analysis of Water**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi/liter ±1 sigma			pCi/liter ±1 sigma				
3/17/2011	E7476-05	Water	H-3	4314	±	163	4530	±	75.7	1.00	A
				4673	±	166					
				4650	±	166					
				Mean = 4546	±	95					
6/16/2011	E7632-05	Water	H-3	833	±	134	905	±	15.1	0.98	A
				923	±	135					
				908	±	135					
				Mean = 888	±	78					
9/15/2011	E8121-05	Water	H-3	915	±	131	792	±	132	1.21	A
				1002	±	132					
				957	±	132					
				Mean = 958	±	76					
12/8/2011	E8181-09	Water	H-3	10617	±	209	10900	±	182	0.94	A
				10199	±	208					
				10082	±	211					
				Mean = 10299	±	121					
12/8/2011	E8182-09	Water	H-3	10339	±	206	10900	±	182	0.94	A
				10320	±	208					
				10090	±	210					
				Mean = 10250	±	120					

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**Gross Beta Analysis of Water**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
03/17/2011	E7479-05	Water	GROSS BETA	250.6 ± 2.50	247 ± 4.13	1.02 A
				252.2 ± 2.50		
				253.6 ± 2.50		
				255.2 ± 2.50		
				Mean = 252.9 ± 1.30		
06/16/2011	E7638-05	Water	GROSS BETA	233.0 ± 2.40	251 ± 4.18	0.93 A
				232.0 ± 2.40		
				234.0 ± 2.40		
				Mean = 233.0 ± 1.39		
09/15/2011	E8126-05	Water	GROSS BETA	253.8 ± 3.30	249 ± 4.16	1.02 A
				256.9 ± 3.30		
				250.4 ± 3.30		
				Mean = 253.7 ± 1.90		

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**I-131 Gamma Analysis of Air Charcoal**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi ±1 sigma			pCi ±1 sigma				
3/17/2011	E7437-09	Air	I-131	96.3	±	3.3	96.2	±	1.61	1.01	A
				97.3	±	1.5					
				98	±	3.2					
				Mean = 97.2	±	1.57					
6/16/2011	E7636-05	Air	I-131	95.3	±	2.7	86.7	±	1.45	1.08	A
				100	±	2.7					
				86.1	±	2.8					
				Mean = 93.8	±	1.57					
9/15/2011	E8125-05	Air	I-131	80.5	±	3	80.5	±	1.34	1.03	A
				83.2	±	3.2					
				84.0	±	3.1					
				Mean = 82.6	±	1.80					
9/15/2011	E8127-09	Air	I-131	72.3	±	4.3	80.5	±	1.34	0.93	A
				72.1	±	4.5					
				80.6	±	4.6					
				Mean = 75.0	±	2.60					

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Water**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)			
				pCi/liter ±1 sigma			pCi/liter ±1 sigma						
3/17/2011	E7477-05	Water	Cr-51	186	±	18.5	196.0	±	3.27	1.04	A		
				205	±	10							
				222	±	25.7							
						Mean =	204	±	11.1				
			Cs-134	94	±	3.32	85.6	±	1.43	1.08	A		
				92	±	2.32							
				91	±	5.06							
						Mean =	92.2	±	2.2				
			Cs-137	143	±	3.86	135.0	±	2.25	1.04	A		
				142	±	2.49							
				134	±	5.55							
						Mean =	140	±	2.4				
Co-58	81	±	2.96	74.4	±	1.24	1.04	A					
	77	±	1.97										
	74	±	4.54										
			Mean =	77.2	±	1.9							
Mn-54	187	±	4.33	175.0	±	2.92	1.06	A					
	183	±	2.82										
	189	±	6.38										
			Mean =	186	±	2.7							
Fe-59	121	±	4.09	115.0	±	1.91	1.05	A					
	128	±	2.83										
	115	±	6.221										
			Mean =	121.0	±	2.7							
Zn-65	198	±	7.05	172.0	±	2.87	1.12	A					
	191	±	4.62										
	187	±	10.3										
			Mean =	192	±	4.4							
Co-60	117	±	2.65	113.0	±	1.88	1.03	A					
	115	±	1.8										
	116	±	3.97										
			Mean =	116	±	1.7							
I-131	92.6	±	3.25	94.0	±	1.57	1.01	A					
	95.9	±	2.12										
	95.3	±	4.53										
			Mean =	94.6	±	1.99							
I-131**	90	±	0.95	94.0	±	1.57	0.94	A					
	84.1	±	2.19										
	90.9	±	2.14										
			Mean =	88.3	±	1.1							

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Water**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS	REFERENCE LAB*	RATIO (1)
				pCi/liter ±1 sigma	pCi/liter ±1 sigma	
6/16/2011	E7617-09	Water	Ce-141	92 ± 7.08	94 ± 1.56	0.95 A
				92 ± 7.37		
				88 ± 7.26		
				87 ± 7.68		
			Mean = 89.6 ± 4.26			
			Cr-51	197 ± 31.8	241 ± 4.03	0.96 A
				183 ± 36.8		
				267 ± 32.1		
				277 ± 45.4		
			Mean = 231 ± 22.2			
			Cs-134	211 ± 11.8	222 ± 3.71	0.98 A
				222 ± 11.6		
				208 ± 10.6		
225 ± 13.9						
Mean = 217 ± 7.2						
Cs-137	168 ± 5.77	161 ± 2.7	1.00 A			
	156 ± 5.73					
	164 ± 5.25					
	156 ± 6.66					
Mean = 161 ± 3.5						
Co-58	190 ± 6.17	177 ± 2.96	1.04 A			
	175 ± 5.95					
	188 ± 5.93					
	183 ± 7.07					
Mean = 184 ± 3.7						
Mn-54	165 ± 5.71	161 ± 2.69	1.07 A			
	183 ± 6.12					
	169 ± 5.41					
	174 ± 7.25					
Mean = 173 ± 3.7						
Fe-59	157 ± 6.81	144 ± 2.41	1.10 A			
	145 ± 6.86					
	173 ± 8.93					
	155 ± 6.68					
Mean = 158 ± 4.4						
Zn-65	316 ± 12.4	305 ± 5.09	1.03 A			
	298 ± 12.1					
	323 ± 12.0					
	316 ± 15.3					
Mean = 313 ± 7.7						
Co-60	226 ± 5.07	228 ± 3.8	1.02 A			
	232 ± 5.17					
	243 ± 4.79					
	225 ± 6.21					
Mean = 232 ± 3.2						
I-131	110 ± 7.24	101 ± 1.68	1.07 A			
	101 ± 7.44					
	106 ± 7.37					
	115 ± 9.22					
Mean = 108 ± 3.9						
I-131**	97.3 ± 1.33	101 ± 1.68	0.96 A			
	97.8 ± 1.52					
	94.3 ± 1.47					
	Mean = 96.5 ± 0.8					

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis

A=Acceptable

U=Unacceptable



**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Water**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*		RATIO (1)		
				pCi/liter ±1 sigma			pCi/liter ±1 sigma				
9/15/2011	E8122-05	Water	Ce-141	47.5	±	4.7	53.2	±	0.89	1.00	A
				52.8	±	4.9					
				59.9	±	4.2					
				Mean = 53.4	±	2.7					
			Cr-51	165.0	±	23.9	180.0	±	3.01	0.97	A
				175.0	±	23.5					
				184.0	±	19.8					
				Mean = 175.0	±	13.0					
			Cs-134	98.6	±	7.0	102.0	±	1.71	0.93	A
				88.6	±	7.8					
				97.5	±	6.7					
				Mean = 94.9	±	4.1					
			Cs-137	91.0	±	3.7	90.7	±	1.51	1.00	A
94.1	±	4.5									
88.0	±	3.5									
Mean = 91.0	±	4.1									
Co-58	75.9	±	3.6	77.7	±	1.30	1.05	A			
	83.7	±	4.4								
	84.3	±	3.4								
	Mean = 81.3	±	2.2								
Mn-54	117.0	±	4.3	120.0	±	2.01	1.01	A			
	118.0	±	4.9								
	128.0	±	3.9								
	Mean = 121.0	±	2.5								
Fe-59	51.7	±	3.8	43.7	±	0.73	1.09	A			
	44.4	±	4.3								
	47.3	±	3.6								
	Mean = 47.8	±	2.3								
Zn-65	149.0	±	7.9	144.0	±	2.40	1.02	A			
	143.0	±	8.9								
	148.0	±	7.0								
	Mean = 147.0	±	4.6								
Co-60	124.0	±	3.3	125.0	±	2.09	0.98	A			
	122.0	±	3.8								
	123.0	±	3.0								
	Mean = 123.0	±	1.9								
I-131	85.9	±	4.5	79.9	±	1.33	1.03	A			
	82.0	±	5.2								
	79.1	±	4.1								
	Mean = 82.3	±	2.7								
I-131**	79.3	±	1.0	79.9	±	1.33	0.97	A			
	76.1	±	1.3								
	76.3	±	1.3								
	Mean = 77.2	±	0.7								

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Water**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi/liter ±1 sigma			pCi/liter ±1 sigma				
12/8/2011	E8183-09	Water	Cr-51	501	±	40.8	566	±	9.45	0.99	A
				612	±	38.1					
				566	±	36.1					
				589	±	34.9					
				546	±	37.7					
			Mean =	563	±	25.5					
			Cs-134	159	±	13.4	171		2.86	0.99	A
				168	±	11.7					
				170	±	9.3					
				178	±	10.8					
				174	±	10.7					
Mean =	169.8	±	7.6								
Cs-137	216	±	7.5	210		3.5	1.03	A			
	213	±	6.7								
	209	±	5.7								
	212	±	6								
	228	±	6.5								
Mean =	215.6	±	4.4								
Co-58	229	±	7.8	221		3.69	1.04	A			
	236	±	7								
	224	±	5.7								
	221	±	6.3								
	237	±	6.5								
Mean =	229.4	±	4.5								
Mn-54	249	±	8.1	241		4.02	1.08	A			
	264	±	7.2								
	269	±	6.2								
	261	±	6.6								
	262	±	6.9								
Mean =	261	±	4.8								
Fe-59	214	±	8.5	183		3.06	1.11	A			
	203	±	77.3								
	203	±	6.4								
	204	±	7								
	188	±	7.3								
Mean =	202.4	±	4.9								
Zn-65	320	±	14.4	291		4.87	1.08	A			
	311	±	12.7								
	330	±	10.3								
	306	±	11.3								
	307	±	12.2								
Mean =	314.8	±	8.3								
Co-60	286	±	6.5	270		4.51	1.06	A			
	287	±	5.7								
	282	±	4.8								
	288	±	5.2								
	287	±	5.5								
Mean =	286	±	3.8								
I-131	92.5	±	5.5	88.7	±	1.48	1.05	A			
	100.0	±	5.3								
	99.6	±	5.5								
	84.9	±	5.4								
	86.6	±	5.6								
Mean =	92.7	±	3.6								
I-131**	107	±	1.9	88.7		1.48	1.25	A			
	116	±	2.1								
	108	±	2.8								
	111	±	2.5								
	Mean =	110.5	±						1.3		

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable U=Unacceptable

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis.

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Milk**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi/liter ±1 sigma			pCi/liter ±1 sigma				
3/17/2011	E7438-09	MILK	Cr-51	264.0	±	41.3	298	±	4.98	0.97	A
				312.0	±	23.2					
				295.0	±	55.9					
				Mean = 290.3	±	16.0					
			Cs-134	135.0	±	7.5	130	±	2.18	1.04	A
				133.0	±	4.7					
				136.0	±	9.8					
				Mean = 134.7	±	3.1					
			Cs-137	206.0	±	8.8	205	±	3.43	1.03	A
				208.0	±	5.0					
				219.0	±	10.6					
				Mean = 211.0	±	3.5					
Co-58	126.0	±	7.2	113	±	1.89	1.07	A			
	122.0	±	4.0								
	116.0	±	9.3								
	Mean = 121.3	±	2.9								
Mn-54	282.0	±	10.0	266	±	4.45	1.05	A			
	275.0	±	5.6								
	279.0	±	12.0								
	Mean = 278.7	±	5.5								
Fe-59	174.0	±	10.7	175	±	2.91	1.06	A			
	184.0	±	6.0								
	198.0	±	14.0								
	Mean = 185.3	±	6.2								
Zn-65	275.0	±	17.1	261	±	4.36	1.13	A			
	287.0	±	9.6								
	324.0	±	21.3								
	Mean = 295.3	±	9.6								
Co-60	184.0	±	6.6	172	±	2.87	1.00	A			
	169.0	±	3.6								
	161.0	±	7.8								
	Mean = 171.3	±	3.6								
I-131	108.0	±	8.4	97	±	1.62	1.07	A			
	104.0	±	4.5								
	97.5	±	9.5								
	Mean = 103.2	±	4.5								
I-131**	95.4	±	6.5	97	±	1.62	1.00	A			
	103.0	±	2.6								
	91.8	±	3.6								
	Mean = 96.7	±	2.6								

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Milk**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi/liter ±1 sigma			pCi/liter ±1 sigma				
6/16/2011	E7634-05	MILK	Ce-141	86.1	±	5.9	80	±	1.33	1.07	A
				85.7	±	8.0					
				84.7	±	7.2					
				Mean = 85.5	±	4.1					
			Cr-51	209.0	±	26.4	206	±	3.44	1.08	A
				221.0	±	42.4					
				238.0	±	37.0					
				Mean = 222.7	±	20.7					
			Cs-134	181.0	±	9.4	190	±	3.17	0.91	A
				179.0	±	12.5					
				159.0	±	13.1					
				Mean = 173.0	±	6.8					
			Cs-137	135.0	±	4.7	138	±	2.3	1.00	A
145.0	±	6.5									
136.0	±	6.4									
Mean = 138.7	±	3.4									
Co-58	158.0	±	4.9	152.0	±	2.53	1.02	A			
	153.0	±	6.6								
	153.0	±	7.0								
	Mean = 154.7	±	3.6								
Mn-54	136.0	±	4.8	138	±	2.3	1.00	A			
	141.0	±	6.8								
	138.0	±	6.5								
	Mean = 138.3	±	3.5								
Fe-59	133.0	±	5.6	123	±	2.06	1.10	A			
	145.0	±	8.6								
	127.0	±	7.7								
	Mean = 135.0	±	4.3								
Zn-65	266.0	±	10.0	261	±	4.35	1.01	A			
	262.0	±	14.4								
	261.0	±	13.8								
	Mean = 263.0	±	7.4								
Co-60	196.0	±	4.1	195	±	3.25	1.02	A			
	196.0	±	5.9								
	205.0	±	5.7								
	Mean = 199.0	±	3.1								
I-131	112.0	±	5.24	103	±	1.72	0.99	A			
	92.3	±	7.65								
	101.0	±	8.95								
	Mean = 101.8	±	4.3								
I-131**	92.3	±	1.2	103	±	1.72	0.89	A			
	89.8	±	1.7								
	92.5	±	1.3								
	Mean = 91.5	±	0.8								

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Milk**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*			RATIO (1)	
				pCi/liter ±1 sigma			pCi/liter ±1 sigma				
9/15/2011	E8124-05	MILK	Ce-141	79.2	±	7.5	67	±	1.11	1.07	A
				64.7	±	5.2					
				69.8	±	6.4					
				Mean = 71.2	±	3.7					
			Cr-51	187.0	±	35.5	226	±	3.78	0.96	A
				243.0	±	25.8					
				224.0	±	29.3					
				Mean = 218.0	±	17.6					
			Cs-134	112.0	±	11.7	128	±	2.14	0.92	A
				124.0	±	8.5					
				116.0	±	9.5					
				Mean = 117.3	±	5.8					
Cs-137	111.0	±	6.0	114	±	1.9	0.99	A			
	111.0	±	4.5								
	115.0	±	4.9								
	Mean = 112.3	±	3.0								
Co-58	104.0	±	5.8	98	±	1.63	1.04	A			
	107.0	±	4.4								
	93.1	±	4.5								
	Mean = 101.4	±	2.9								
Mn-54	168.0	±	6.9	151	±	2.52	1.06	A			
	157.0	±	5.1								
	154.0	±	5.6								
	Mean = 159.7	±	3.4								
Fe-59	61.9	±	7.0	55	±	0.915	1.11	A			
	65.8	±	4.9								
	55.2	±	5.4								
	Mean = 61.0	±	3.4								
Zn-65	194.0	±	13.6	180	±	3.01	1.08	A			
	191.0	±	9.4								
	199.0	±	10.6								
	Mean = 194.7	±	6.5								
Co-60	159.0	±	5.3	157	±	2.62	1.02	A			
	165.0	±	4.1								
	155.0	±	4.4								
	Mean = 159.7	±	2.7								
I-131	86.9	±	6.6	89.2	±	1.49	1.06	A			
	97.9	±	5.3								
	97.7	±	5.8								
	Mean = 94.2	±	3.4								
I-131**	79.8	±	1.1	89.2	±	1.49	0.89	A			
	79.5	±	1.0								
	78.5	±	1.6								
	Mean = 79.3	±	0.7								

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

\*\* Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Air Particulate Filter**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
3/17/2011	E7478-05	FILTER	Cr-51	221.0 ± 15.9	230 ± 3.84	0.98 A
				224.0 ± 18.0		
				233.0 ± 13.7		
				Mean = 226.0 ± 9.2		
			Cs-134	117.0 ± 4.5	101 ± 1.68	1.13 A
				111.0 ± 4.9		
				115.0 ± 3.8		
				Mean = 114.0 ± 2.6		
Cs-137	169.0 ± 4.5	158 ± 2.64	1.04 A			
	159.0 ± 4.8					
	165.0 ± 3.8					
	Mean = 164.0 ± 2.5					
Co-58	90.0 ± 3.5	87.3 ± 1.46	1.01 A			
	84.0 ± 4.1					
	90.0 ± 3.2					
	Mean = 88.1 ± 2.1					
Mn-54	211.0 ± 5.2	205 ± 3.43	1.06 A			
	221.0 ± 5.8					
	218.0 ± 4.5					
	Mean = 217.0 ± 3.0					
Fe-59	144.0 ± 5.2	134 ± 2.24	1.09 A			
	138.0 ± 6.1					
	156.0 ± 4.6					
	Mean = 146.0 ± 3.1					
Zn-65	226.0 ± 8.8	201 ± 3.36	1.07 A			
	212.0 ± 9.8					
	208.0 ± 7.6					
	Mean = 215.0 ± 5.0					
Co-60	127.0 ± 3.4	132 ± 2.21	0.98 A			
	132.0 ± 3.8					
	130.0 ± 2.9					
	Mean = 130.0 ± 1.9					

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Air Particulate Filter**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS	REFERENCE LAB*	RATIO (1)		
				pCi ±1 sigma	pCi ±1 sigma			
9/15/2011	E8123-05	FILTER	Ce-141	6.84E+01 ± 2.80E+00	6.96E+01 ± 1.16E+00	1.02 A		
				7.11E+01 ± 2.70E+00				
				7.35E+01 ± 2.80E+00				
						Mean = 7.10E+01 ± 1.60E+00		
			Cr-51	2.17E+02 ± 1.84E+01	2.36E+02 ± 3.94E+00	0.96 A		
				2.32E+02 ± 1.79E+01				
				2.28E+02 ± 1.80E+01				
						Mean = 2.26E+02 ± 1.05E+01		
			Cs-134	1.15E+02 ± 8.70E+00	1.34E+02 ± 2.23E+00	0.85 A		
1.15E+02 ± 8.50E+00								
1.11E+02 ± 8.20E+00								
			Mean = 1.14E+02 ± 4.89E+00					
Cs-137	1.24E+02 ± 4.30E+00	1.19E+02 ± 1.98E+00	0.99 A					
	1.14E+02 ± 4.20E+00							
	1.15E+02 ± 4.00E+00							
			Mean = 1.18E+02 ± 2.41E+00					
Co-58	1.04E+02 ± 4.10E+00	1.02E+02 ± 1.70E+00	1.05 A					
	1.08E+02 ± 4.10E+00							
	1.08E+02 ± 4.00E+00							
			Mean = 1.07E+02 ± 2.35E+00					
Mn-54	1.75E+02 ± 5.20E+00	1.57E+02 ± 2.63E+00	1.11 A					
	1.67E+02 ± 5.10E+00							
	1.79E+02 ± 4.80E+00							
			Mean = 1.74E+02 ± 2.91E+00					
Fe-59	6.17E+01 ± 4.90E+00	5.72E+01 ± 9.55E-01	1.13 A					
	6.86E+01 ± 4.80E+00							
	6.35E+01 ± 4.30E+00							
			Mean = 6.46E+01 ± 2.70E+00					
Zn-65	1.97E+02 ± 1.01E+01	1.88E+02 ± 3.14E+00	1.13 A					
	2.18E+02 ± 9.80E+00							
	2.25E+02 ± 9.00E+00							
			Mean = 2.13E+02 ± 5.57E+00					
Co-60	1.61E+02 ± 4.20E+00	1.64E+02 ± 2.74E+00	0.98 A					
	1.59E+02 ± 4.10E+00							
	1.64E+02 ± 3.90E+00							
			Mean = 1.61E+02 ± 2.35E+00					

(1) Ratio = Reported/Analytics.

A=Acceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Soil**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*		RATIO (1)		
				pCi/g ±1 sigma			pCi/g ±1 sigma				
6/16/2011	E7635-05	SOIL	Ce-141	0.189	±	0.022	0.154	±	0.003	1.24	A
				0.189	±	0.020					
				0.193	±	0.021					
				Mean = 0.190	±	0.012					
			Cr-51	0.316	±	0.010	0.397	±	0.007	0.86	A
				0.365	±	0.009					
				0.342	±	0.009					
				Mean = 0.341	±	0.005					
			Cs-134	0.358	±	0.003	0.366	±	0.006	0.97	A
				0.363	±	0.003					
0.349	±	0.004									
Mean = 0.357	±	0.002									
Cs-137	0.308	±	0.019	0.355	±	0.006	0.95	A			
	0.354	±	0.019								
	0.347	±	0.021								
	Mean = 0.336	±	0.011								
Co-58	0.292	±	0.018	0.292	±	0.005	1.00	A			
	0.295	±	0.017								
	0.290	±	0.020								
	Mean = 0.292	±	0.011								
Mn-54	0.304	±	0.017	0.266	±	0.004	1.09	A			
	0.281	±	0.017								
	0.285	±	0.020								
	Mean = 0.290	±	0.010								
Fe-59	0.233	±	0.020	0.238	±	0.004	1.03	A			
	0.253	±	0.021								
	0.248	±	0.023								
	Mean = 0.245	±	0.012								
Zn-65	0.522	±	0.033	0.502	±	0.008	1.08	A			
	0.557	±	0.034								
	0.553	±	0.039								
	Mean = 0.544	±	0.020								
Co-60	0.402	±	0.015	0.375	±	0.006	1.03	A			
	0.386	±	0.015								
	0.369	±	0.017								
	Mean = 0.386	±	0.009								

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable



**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Vegetation**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS			REFERENCE LAB*		RATIO (1)		
				pCi/g ±1 sigma			pCi/g ±1 sigma				
6/16/2011	E7637-05	VEG	Ce-141	0.274	±	0.013	0.307	±	0.005	0.92	A
				0.270	±	0.015					
				0.304	±	0.014					
				Mean = 0.283	±	0.008					
			Cr-51	0.739	±	0.073	0.792	±	0.013	1.00	A
				0.767	±	0.088					
				0.863	±	0.071					
				Mean = 0.790	±	0.045					
			Cs-134	0.664	±	0.035	0.729	±	0.012	0.89	A
				0.660	±	0.004					
0.629	±	0.003									
Mean = 0.651	±	0.012									
Cs-137	0.494	±	0.016	0.530	±	0.009	0.95	A			
	0.506	±	0.019								
	0.511	±	0.015								
	Mean = 0.504	±	0.010								
Co-58	0.579	±	0.017	0.583	±	0.010	0.99	A			
	0.556	±	0.019								
	0.595	±	0.015								
	Mean = 0.577	±	0.010								
Mn-54	0.520	±	0.017	0.530	±	0.009	0.96	A			
	0.512	±	0.019								
	0.487	±	0.015								
	Mean = 0.506	±	0.010								
Fe-59	0.487	±	0.019	0.474	±	0.008	1.03	A			
	0.514	±	0.023								
	0.470	±	0.017								
	Mean = 0.490	±	0.011								
Zn-65	1.100	±	0.037	1.000	±	0.017	1.01	A			
	0.941	±	0.043								
	0.983	±	0.031								
	Mean = 1.008	±	0.022								
Co-60	0.718	±	0.015	0.748	±	0.013	0.94	A			
	0.716	±	0.017								
	0.680	±	0.013								
	Mean = 0.705	±	0.009								

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

**TABLE 7.3.2 (Continued)**  
**INTERLABORATORY INTERCOMPARISON PROGRAM**  
**Gamma Analysis of Vegetation**

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF ELAB RESULTS pCi/g ±1 sigma	REFERENCE LAB* pCi/g ±1 sigma	RATIO (1)
9/15/2011	E8128-09	VEG	Ce-141	0.151 ± 0.013	0.169 ± 0.003	0.95 A
				0.167 ± 0.017		
				0.163 ± 0.015		
				Mean = 0.160 ± 0.009		
			Cr-51	0.632 ± 0.082	0.573 ± 0.010	1.07 A
				0.553 ± 0.114		
				0.662 ± 0.009		
				Mean = 0.616 ± 0.047		
			Cs-134	0.332 ± 0.029	0.325 ± 0.005	0.97 A
0.343 ± 0.032						
0.271 ± 0.033						
Mean = 0.315 ± 0.018						
Cs-137	0.299 ± 0.014	0.288 ± 0.005	0.97 A			
	0.256 ± 0.016					
	0.281 ± 0.016					
	Mean = 0.279 ± 0.009					
Co-58	0.273 ± 0.014	0.247 ± 0.004	1.06 A			
	0.256 ± 0.016					
	0.258 ± 0.016					
	Mean = 0.262 ± 0.009					
Mn-54	0.400 ± 0.016	0.382 ± 0.006	1.04 A			
	0.430 ± 0.020					
	0.366 ± 0.019					
	Mean = 0.399 ± 0.011					
Fe-59	0.158 ± 0.016	0.139 ± 0.002	1.01 A			
	0.155 ± 0.021					
	0.109 ± 0.019					
	Mean = 0.141 ± 0.011					
Zn-65	0.419 ± 0.029	0.457 ± 0.008	1.01 A			
	0.493 ± 0.039					
	0.477 ± 0.036					
	Mean = 0.463 ± 0.020					
Co-60	0.388 ± 0.013	0.397 ± 0.007	0.96 A			
	0.366 ± 0.015					
	0.395 ± 0.015					
	Mean = 0.383 ± 0.008					

(1) Ratio = Reported/Analytics.

\* Sample provided by Analytics, Inc.

A=Acceptable

U=Unacceptable

### **7.3.5 REFERENCES**

- 7.3.5.1 Radioactivity and Radiochemistry, The Counting Room: Special Edition, 1994 Caretaker Publications, Atlanta, Georgia.
- 7.3.5.2 Data Reduction and Error Analysis for the Physical Sciences, Bevington P.R., McGraw Hill, New York (1969).

## **8. Land Use Census**

The Vermont Yankee Nuclear Power Station Off-site Dose Calculation Manual 3/4.5.2 requires that a Land Use Census be conducted annually between the dates of June 1 and October 1. The census identifies the locations of the nearest milk animal and the nearest residence in each of the 16 meteorological sectors within a distance of five miles of the plant. The census also identifies the nearest milk animal (within three miles of the plant) to the point of predicted highest annual average D/Q (deposition factor for dry deposition of elemental radionuclides and other particulates) value due to elevated releases from the plant stack in each of the three major meteorological sectors. The 2011 Land Use Census was conducted in the summer of 2011 in accordance with the ODCM.

Following the collection of field data and in compliance with Off-site Dose Calculation Manual (ODCM) Section 10.1, a dosimetric analysis would be performed to compare the census locations to the "critical receptor" identified in the ODCM. This critical receptor is the location that is used in the Method 1 screening dose calculations found in the ODCM (i.e. the dose calculations done in compliance with ODCM Surveillance 4.3.3). If a census location has a 20% greater potential dose than that of the critical receptor, this fact must be announced in the annual Radioactive Effluent Release Report for that period. A re-evaluation of the critical receptor would also be done at that time. No changes in the census data from year 2008 occurred in the 2011 census; therefore no revisions of the 2008 calculations were required.

Pursuant to ODCM 3.5.2.a, a dosimetric analysis would be performed, using site specific meteorological data, to determine which milk animal locations would provide the optimal sampling locations. If any location had experienced a 20% greater potential dose commitment than at a currently sampled location, the new location would be added to the routine environmental sampling program in replacement of the location with the lowest calculated dose (which is eliminated from the program). The 2011 Land Use Census did not identify any locations, meeting the criteria of ODCM Table 3.5.1, with a greater potential dose commitment than at currently sampled locations. No changes to the Radiological Environmental Monitoring Program (REMP) were required based on the Land Use Census.

The results of the 2011 Land Use Census are included in this report in compliance with ODCM 4.5.2 and ODCM 10.2. The locations identified during the census may be found in Table 8.1.

**TABLE 8.1****2011 LAND USE CENSUS LOCATIONS\***

SECTOR	NEAREST RESIDENCE Km (Mi)	NEAREST MILK ANIMAL Km (Mi)
N	1.4 (0.9)	----
NNE	1.4 (0.9)	5.5 (3.4) Cows
NE	1.3 (0.8)	----
ENE	1.0 (0.6)	----
E	0.9 (0.6)	----
ESE	1.9 (1.1)	----
SE	2.0 (1.2)	3.6 (2.2) Cows**
SSE	2.1 (1.3)	----
S	0.6 (0.4)	2.2 (1.4) Cows**
SSW	0.5 (0.3)	----
SW	0.4 (0.3)	8.2 (5.1) Cows
WSW	0.5 (0.3)	----
W	0.6 (0.4)	0.8 (0.5) Cows
WNW	1.1 (0.7)	----
NW	2.3 (1.4)	----
NNW	1.7 (1.0)	----

\* Sectors and distances are relative to the plant stack as determined by a Global Positioning System survey conducted in 1997.

\*\* Location of nearest milk animal within 3 miles of the plant to the point of predicted highest annual average D/Q value in each of the three major meteorological sectors.

## 9. SUMMARY

During 2011 as in all previous years of plant operation, a program was conducted to assess the levels of radiation or radioactivity in the Vermont Yankee Nuclear Power Station environment. Over 1000 samples were collected (including TLDs) over the course of the year, with a total of over 2700 radionuclide or exposure rate analyses performed. The samples included groundwater, river water, sediment, fish, milk, silage, mixed grass, storm drain sediment, and storm drain water. In addition to these samples, the air surrounding the plant was sampled continuously and the radiation levels were measured continuously with environmental TLDs.

Three of the objectives of the Radiological Environmental Monitoring Program (REMP) are:

- To provide an early indication of the appearance or accumulation of any radioactive material in the environment caused by the operation of the station.
- To provide assurance to regulatory agencies and the public that the station's environmental impact is known and within anticipated limits.
- To verify the adequacy and proper functioning of station effluent controls and monitoring systems. .

Low levels of radioactivity from three sources (discussed below) were detected in samples collected off-site as a part of the radiological environmental monitoring program. Most samples had measurable levels of naturally-occurring K-40, Be-7, Th-232 or radon daughter products. These are the most common of the naturally-occurring radionuclides.

Samples of milk and sediment contained fallout radioactivity such as Cs-137 and Sr-90 from atmospheric nuclear weapons tests conducted primarily from the late 1950s through 1980.

Tritium, at concentrations significantly higher than background levels, was detected in on-site groundwater monitoring wells installed in 2007 and in 2010 in response to industry events and the discovery of primary system leakage from underground Augmented Off Gas (AOG) System condensate return piping into the subsurface groundwater pool under the plant site. The leakage from this piping was terminated in early February, 2010. Extensive sampling and analysis was performed on groundwater samples and other media throughout all of year 2011. Further steps to remediate the contamination of the subsurface groundwater layer under the plant site are underway. More detail of this event is provided in

the 2011 Annual Radioactive Effluent Release Report.

Finally, the accidents at the Fukushima Daiichi nuclear power stations in Japan in early 2011 led to brief but measurable plant-generated radioactive materials in environmental samples collected from around the United States and the planet. REMP samples obtained from Vermont Yankee environmental air sample stations and local dairies during 2011 identified detectable concentrations of isotopes that could be related to operation of Entergy Vermont Yankee. Given the following facts, it is concluded that the detectable concentrations are not a result of Entergy Vermont Yankee operation:

- (1) The quantities of radioactive airborne effluents from Entergy Vermont Yankee during 2011 did not increase significantly compared to year 2010.
- (2) Prior REMP sample results have not detected the presence of these isotopes in air and milk samples collected in support of the Entergy Vermont Yankee REMP.
- (3) The concentrations being detected in the indicator samples were also identified in the control samples from Entergy Vermont Yankee.

As such, the atypical detection of these radionuclides in both indicator and control samples is credibly attributed to the trans-Pacific transport of airborne releases from Fukushima Daiichi following the March 11, 2011 Tohoku earthquake and is not related to the operations of Entergy Vermont Yankee.

## 10. REFERENCES

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