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

#### **RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT - 2012**

Ladies and Gentlemen:

In accordance with the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Technical Specifications, Section 5.6.2, "Annual Radiological Environmental Operating Report," enclosed is the Radiological Environmental Operating Report for the period January 1, 2012, through December 31, 2012.

If you have any questions concerning this report, please contact me at (843) 857-1329.

Sincerely,

W. Richard y

W. Richard Hightower Supervisor - Licensing/Regulatory Programs

WRH/mjp

Enclosure

c: V. M. McCree, NRC, Region II A. T. Billoch Colón, NRC, NRR (w/o Enclosure) NRC Resident Inspector K. A. Collinsworth / DHEC



# RADIOLOGICAL

# **ENVIRONMENTAL OPERATING**

# REPORT

2012



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

# **DUKE ENERGY PROGRESS, INC.**

# FORMERLY KNOWN AS

**CAROLINA POWER & LIGHT COMPANY** 

#### **RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT**

## FOR THE

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

### **FACILITY OPERATING LICENSE NO. DPR-23**

**DOCKET NO. 50-261** 

## JANUARY 1 THROUGH DECEMBER 31, 2012

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# **EXECUTIVE SUMMARY**

The H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP) is operated by Duke Energy Progress, Inc.; formerly known as Carolina Power & Light Company; under a license granted by the Nuclear Regulatory Commission (NRC). The HBRSEP Technical Specifications and the HBRSEP Off-Site Dose Calculation Manual establish the requirements of the Radiological Environmental Monitoring Program. This report provides the results of the Radiological Environmental Monitoring program from January 1, 2012, through December 31, 2012.

The Radiological Environmental Monitoring program was established in 1973. Radiation and radioactivity in various environmental media have been monitored for more than 38 years. Monitoring is also provided for control locations that would not be impacted by operation of the HBRSEP. Using these control locations and data collected prior to operation allows comparison of data collected at locations near HBRSEP that could potentially be impacted by its operation. The pre-operational monitoring program began in December 1968.

Monitoring results for environmental media are summarized as follows:

- Air-monitoring results are similar or less than the concentrations of radioactivity from preoperation monitoring. These observations are also consistent with past operational data other than during the timeframe of fallout from the Fukushima Dai-ichi nuclear power plant.
- Milk monitoring has not been conducted due to the unavailability of milk samples in the area since July 17, 1998, when the dairy ceased operation. Milk sampling will resume if a new sample location is identified. Broadleaf sampling is conducted, since no milk animals are located within five miles of the plant in any sector.
- Terrestrial vegetation includes broadleaf vegetation and food products. Results indicate detectable concentrations of Cs-137 in both the indicator and control locations for broadleaf vegetation with comparable results. The Cesium-137 concentrations were also comparable to previous years. No other gamma by-product/plant-related activity was detected in any samples, except for K-40 and other naturally occurring gamma activity. Sampling of miscellaneous food products (non-leafy) in the vicinity of the site is conducted when leafy vegetables are not being grown. The concentrations identified were comparable to previous years' data.
- Aquatic organism surveillances include fish and aquatic vegetation. Fish samples revealed detectable concentrations of Cs-137 activity in both indicator and control locations. No other gamma by-product/plant-related activity was detected in any fish sample, except for K-40 and other naturally occurring gamma activity. The concentrations observed are consistent with previous years' data. The aquatic vegetation is used for long term trending and there is no dose contribution to the public. Co-58 and Co-60 activity was detected in one indicator sample in 2012.

- Surface water results indicate no by-product/plant-related gamma activity in 2012. Surface water (non-drinking water) results indicate that the surface water from Lake Robinson shows the presence of tritium, which is attributed to plant operation; but is well below the EPA reportable non-drinking water limit (30,000 pCi/Liter) and drinking water limit (20,000 pCi/Liter). The tritium concentrations observed are not irreversible to the environment due to plant operations (See Figure 13) and are consistent with previous years' data. Refer to the Interpretations and Conclusions Section / Surface Water.
- Ground water results show the presence of tritium; however, the results are well below the EPA reportable non-drinking water limit (30,000 pCi/Liter) and drinking water limit (20,000 pCi/Liter). Refer to the Interpretations and Conclusions Section / Ground Water.
- Sediment surveillance includes both shoreline and bottom sediment. The shoreline sediment gamma analyses identified naturally occurring gamma activity and no gamma by-product/plant-related activity was detected in any shoreline sediment sample collected in 2012. These samples are used to calculate groundplane dose to the public. During 2012, bottom sediment results indicated the presence of Cs-137 and Co-60 at concentrations consistent with previous years. Bottom sediment is used for long term trending and there is no public dose associated with these samples.
- External radiation dose showed no measurable change from pre-operational data

The continued operation of HBRSEP has not significantly contributed radiation or the presence of radioactivity in the environmental media monitored. The measured concentrations of radioactivity are well within applicable regulatory limits.

# RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

# PURPOSE AND REQUIREMENTS FOR THE RADIOLOGICAL MONITORING PROGRAM

The purpose of the radiological monitoring program is to measure accumulation of radioactivity in the environment, to determine whether this radioactivity is the result of operation of the HBRSEP, and to assess the potential dose to the off-site population based on the cumulative measurements of radioactivity of plant origin. Radiological environmental monitoring programs provide an additional verification of the containment and radiological controls of nuclear generating stations.

Requirements are established for the radiological monitoring program in the Technical Specifications and the Off-Site Dose Calculation Manual (ODCM).

Additional guidance regarding the radiological monitoring program may be found in the following:

- NRC Regulatory Guide 1.109, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, Revision 1, October 1977
- NRC Regulatory Guide 4.13, Performance, Testing, and Procedural Specifications for Thermoluminescence Dosimetry: Environmental Applications, Revision 1, July 1977
- NRC Regulatory Guide 4.15 revision 1, Quality Assurance for Radiological Monitoring Programs (Normal Operation) - Effluent Streams and the Environment, Revision 1, February 1979
- NRC Regulatory Guide 4.1, Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants, Revision 1, April 1975
- NRC Regulatory Guide 4.8, Environmental Technical Specifications for Nuclear Power Plants, For comment, December 1975
- Radiological Assessment Branch Technical Position, An Acceptable Radiological Environmental Monitoring Program, Revision 1, November 1979

## **General Site Description**

The HBRSEP (Unit No. 2) consists of a pressurized water reactor with a design rating of 800 MWe (Megawatts electric). The site is shared with a pulverized coal unit (Unit No.1), which established commercial operation in 1960. Unit 1 is now offline and is scheduled to be decommissioned. Commercial production was initiated by Unit No. 2 on March 7, 1971. The HBRSEP is located in Darlington County, South Carolina. The site is along state route 151 approximately five (5) miles northwest of Hartsville, South Carolina and is displayed on the map of northeastern South



Figure 1: Location of HBRSEP

Carolina (Figure 1). The site is also

approximately twenty five (25) miles northwest of Florence, South Carolina.

Lake Robinson is adjacent to the plant and is the source of cooling water. The lake was impounded during the construction of Robinson Unit No.1 (coal fired). The lake is fed by Black Creek and is approximately 2,250 acres in area. The plant intake is at the southern portion of the lake near the dam. The discharge is to a canal which conveys the cooling water to a point 4.2 miles north of the plant, where it returns to Lake Robinson.

The local economy supports primarily industrial and agricultural contributions. Fishing, boating, and swimming are popular activities on Lake Robinson and other nearby lakes. These activities contribute to the radiological pathways by consumption of fish and immersion related to swimming and boating. Consumption of milk and food products contributes to the ingestion pathway. No milk animals are located within five miles of the plant in any sector at this time, so broadleaf sampling is conducted to simulate the milk ingestion pathway.

## **RADIOLOGICAL MONITORING PROGRAM QUALITY ASSURANCE**

A required component of the environmental radiological monitoring program is the Quality Assurance Program. The standards for the Quality Assurance Program are established in the NRC Regulatory Guide (R.G.) 4.15 revision 1, "Quality Assurance for Radiological Monitoring Programs. According to R.G. 4.15 revision 1, the purpose of the Quality Assurance Program is to "(1) to identify deficiencies in the sampling and measurement processes to those responsible for these operations so that corrective action can be taken, and (2) to obtain some measure of confidence in the results of the monitoring programs in order to assure the regulatory agencies and the public that the results are valid." NRC Regulatory Guide 4.15 B, Pg. 4.15-2 revision 1. This provides the opportunity to implement corrective actions that address possible deficiencies. Examples of the activities of the Quality Assurance Program include:

- regular review of sample collection and records
- > regular review of laboratory procedures and methods
- participation in an Environmental Interlaboratory Comparison Program, which provides an independent assessment of the quality of laboratory results.
- the use of known concentrations of radioactivity in test samples by the laboratory to ensure consistent quality results on an ongoing basis.

## **RADIOLOGICAL MONITORING PROGRAM GENERAL DESCRIPTION**

Although the contribution to background radiation is small, Duke Energy Progress, Inc.; formerly known as Carolina Power & Light Company; has established this program to measure the exposure pathways to man. An exposure pathway describes the source of the radiological exposure. The primary forms of potential radiological emissions from the plant are airborne and liquid discharge. The pathways monitored are external dose, ingestion of radioactive materials, and the inhalation of radioactive material. Specific methods and different environmental media are required to assess each pathway. Table 1 provides a list of the media used to assess each of these pathways.

#### Table 1

Purpose of Samples	Sample Media		
······································	Shoreline Sediment		
External Dose	Thermoluminescent Dosimetry (TLD)		
	Milk (Broadleaf Vegetation)		
Ingestion	Food Products		
	Fish (Surface Water)		
	Ground Water		
Inhalation	Air Samples (Particulate & Radioiodine)		
Trending	Aquatic Vegetation		
	Bottom Sediment		
	Surface Water (Tritium)		

#### Media Used to Assess Exposure Pathways to Man

### **Sampling Locations**

Sampling locations are chosen based upon meteorological factors, pre-operational monitoring, and results of the land use surveys. A number of locations are selected as controls. Control stations are selected because they are very unlikely to be affected by operation of the plant. Sample locations may be seen in Figures 2 and 3. A description of each sample location may be found in Table 2.



# **Radiological Sampling Locations**

Stations not shown include 1, 7-18, 20-39, 41, 45, 46, 47, 49, 52, 54, 57, 58, 66, 71, 76, and 79.

Sample Types

Air Cartridge & Particulate Shoreline Sediment Ground Water Broadleaf Vegetation Surface Water Thermoluminescent Dosimeter Fish Food Products Aquatic Vegetation & Bottom Sediment Sample Locations 1-7, 55, 60, 61 44, 57 42, 64, 68 – 73, 75 – 79, 81 - 82 50, 51, 52, 62, 67 40, 41, 57, 66 1-39, 55, 56, 61, 65 45-47 49, 54, 58 41, 45, 46, 66

# **Radiological Sampling Locations**



# Figure 3: Radiological Sampling Locations (Distant from Plant)

Stations not shown include 1, 2, 6, 7, 26, 41, 42, 47 (varies), 49 (varies), 50 - 52, 54 - 58 (varies), 60 - 62, 65 - 73, 75 - 79, and 81 - 82.

#### Sample Types

Air Cartridge & Particulate Shoreline Sediment Ground Water Broadleaf Vegetation Surface Water Thermoluminescent Dosimeter Fish Food Products Aquatic Vegetation & Bottom Sediment

#### **Sample Locations**

1-7, 55, 60, 61 44, 57 42, 64, 68 – 73, 75 – 79, 81 - 82 50, 51, 52, 62, 67 40, 41, 57, 66 1-39, 55, 56, 61, 65 45-47 49, 54, 58 41, 45, 46, 66

## Table 2

# Radiological Monitoring Sampling Locations for H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP)

Sample Type	Location & Description	Frequency	Sample Size	Analysis
Air Cartridge	124.4 miles ESE Florence, S.C.*	Weekly	510 m <sup>3</sup>	Iodine
(AC)	20.2 miles S Information Center			
	30.5 miles N Microwave Tower			
ĺ	40.4 miles ESE Spillway			1
	50.9 miles ENE East shore of lake near Johnson's			
	Landing		}	
Į	60.2 miles SSW Information Center			
	76.4 miles ESE CP&L facility on RR Ave.,			
	Hartsville			
	550.2 miles SSE South of West Settling Pond			
	600.2 miles SE Robinson Picnic Area			
	610.3 miles WSW West Parking lot near KR tracks			<u> </u>
Air Particulate	124.4 miles ESE Florence, S.C.*	Weekly	510 m <sup>2</sup>	Gross Beta
(AP)	20.2 miles S Information Center			(Weekly)
)	30.5 miles N Microwave Tower	ļ	]	
	<b>5</b> 0.0 miles ESE Spillway			
(	Londing			Composito
ł	6-0.2 miles SSW Information Center			Gamma
ł	76 4 miles ESE CP&L facility on RR Ave			(Quarterly)
{	Hartsville			(Quarteriy)
	550.2 miles SSE South of West Settling Pond			] }
	600.2 miles SE Robinson Picnic Area			
	610.3 miles WSW West Parking lot near RR tracks			
Fish (FI)	45Site varies within Lake Robinson	Semiannual	495 grams	Gamma
(Bottom Feeders	46Site varies within Prestwood Lake		(wet)	(edible
& Free	47Control station, Any lake not influenced by plant			portions)
Swimmers)	discharge*			
Broadleaf	50SSE Close to Site Boundary	Monthly	350 grams	Gamma
Vegetation (BL)	51SSW Close to Site Boundary	(As available)	(wet)	Iodine
	5210 miles W near Bethune*			
1	62SE Close to Site Boundary		1	(
	67S Close to Site Boundary			
Shoreline	441.6 miles NNE East shore of lake, Shady Rest	Semiannual	575 grams	Gamma
Sediment (SS)				
	57Asn Pond Shore	<u> </u>	420	<u> </u>
Aquatic Veg.	417.2 miles NNW Black Creek (upstream)*	Annual	420 grams	Gamma
(AV) &	45Site varies within Lake Robinson		and 575 oroma	
Sedimente (SD)	66 Plack Crock between Prestwood Lake		575 grains	
	& unstream of Sonoco Spray Farm (doumstream)	ł		1
Ground Water	42-Unit 1 Deen Wells	Quarterly	1.5 liters	Gamma
(GW)	640 6 miles SE Artesian Well	Grab	1.5 mers	Tritium
	69Well B Behind the Training Building		,	
ļ	70Well C Btwn the O&M Building & Fab Shon			ļ
	710.87 miles NNW (MW-03A) Btwn Ash Pond &			
ĺ	RR tracks	l	ĺ	1
-	720.10 miles E (MW-06) 20 ft from FP/FH 7 fire		1	
ł	hydrant & Unit 1 North Deep Well Pump			1
	730.11 miles ENE (MW-13) Btwn Discharge	1		
	Canal & Unit 1 Stand Alone Fuel Oil Tanks	l		

\* Control Stations

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#### Table 2 (Continued)

# Radiological Monitoring Sampling Locations for

## H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP)

Sample Type	Location & Description	Frequency	Sample Size	Analysis
Ground Water (GW) Continued	<ul> <li>750.05 miles NE (PSW-02) By Unit 1 boundary Fence to Unit 2 across paved rd. from Hydrogen Gas Tanks</li> <li>760.49 miles N (PSW-03) NE corner of the MET Tower Station</li> <li>770.25 miles SSE (TS-01B) By entrance rd. to Unit 1</li> <li>780.17 miles SSE (TS-02C) NE corner by East Settling Pond influent by fence</li> <li>791.0 miles N (TS-07C) S corner by cove &amp; Discharge Canal</li> <li>810.19 miles SSE (TS-17B) W of West Settling Pond across payed rd</li> </ul>	Quarterly Grab	1.5 liters	Gamma Tritium
Ground Water (GW) Continued	68Well A Btwn Unit 1 Switchyard & breakroom	Quarterly Grab	6.5 liters	Gamma, Tritium, Iodine
Ground Water (GW) Continued	820.3 miles SSE (PDW-01) By entrance rd. to Unit 1	Quarterly Grab	6.5 liters	Gamma, Tritium, lodine, Gross Beta
Surface Water (SW)	<ul> <li>400.6 miles ESE Black Creek at Old Camden Road (S-16-23)</li> <li>418.0 miles N Black Creek at US Hwy 1*</li> <li>57Ash Pond</li> <li>66Black Creek between Prestwood Lake discharge &amp; upstream of Sonoco Spray Farm (downstream)</li> </ul>	Monthly Composite	4 liters	Gamma Tritium
Food Products (FP)	<ul> <li>58Site varies from plant</li> <li>4910.0 miles W or greater than 5 miles from plant *</li> <li>5410.1 miles E Auburndale Plantation (if irrigating from Black Creek)</li> </ul>	Annual at Harvest	350 grams	Gamma (edible portions)

\* Control Stations

.

#### Table 2 (Continued)

# **Radiological Monitoring Sampling Locations**

for

#### H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP)

Sample Type	Location & Description	Frequency	Sample Size	Analysis
Thermoluminescent	1 24 4 miles ESE Elerance S.C. *	Quartarly	Not	TID
Dosimetry (TLD)	2 = 0.2 mile S Information Center <sup>1, 2</sup>	Quarterry	Applicable	Reading
Dosinieny (11.D)	3-0.5 mile N Microwave Tower		Applicable	Reading
	A-0.4 mile FSE Snillway			Gamma
	5-0.0 mile ENE East shore of loke near Johnson's Landing			Dose
	6-0.2 mile SSW Information Center <sup>1, 2</sup>			Dose
1	7-6 A miles ESE CD&L Encility on DD Ave Hartsville			
	8-0.8 mile SSE Transmission right-of-way			
	0-1.0 mile S Transmission right-of-way			
	101.0 mile WSW Clyde Church of God			
	111.0 mile SW Old Camden Road	}	r	
	12-1.2 miles SSW off of Old Camden Road			
	13-0.7 miles W Corner of Soludo and Sondnit Roads			
	14-0 g mile WNW First Pantist Church of Pine Pidge			
	15-0.7 miles NW Transmission right-of-way		ł	
	16-1.0 mile NNW South side of Darlington Co. I.C. Turbine Plant			
	17-1.2 miles N Derlington Co. Plant amergency fire numn		1	
	18. 0.7 mile SE Near Old Plack Crack PR tractle			
	10-10 mile E Old Comden Bood (#\$ 16.23)			1
	$20 \pm 1.0$ mile E Old Canden Road (#S-10-23)	ļ	]	
	211.0 Infic ENE New Market Dood (#S-10-33)	1	ſ	
	22-1.7 miles NNE Shady Post entrance off of Cloverdale Drive			
	22-1.7 miles INNE Shady Kest entrance on of Cloverdate Drive		1	[
	24. 4.6 miles NW Sowell Boad (#S-10-57)			
	244.0 miles N W Sowell Road (#S-15-711) 25 4.0 miles NNW Lake Debingen Dead (#S-13-346)			
	26-5.0 miles NL die Pobinson Pood (#\$-13-346)	}	ļ	J
	27-54 miles IN Lake Robinson Road (#S-15-540)			
	275.4 miles NNE Prospect Church Road (#S-15-705)	}	ļ	]
	20-4.5 miles INE New Market Road (#5-15-57)			
	20 - 4.0 miles E NE Ruby Road (#S-10-20)			1
	31-4.4 miles ESE on Lakeshore Drive			
	22 - 4.0 miles SE Transmission right of way			
	32-4.0 miles SEE on Bay Doad (#S-16-403)		1	
	34-4.7 miles Son Kellybell Road (#S-16-772)	}	}	1
	34-4.7 miles S on Kenyben Kodu (#S-10-772) 35 4.5 miles SSW Kelly Dridge Deed (#S-31-51)			
	36-50 miles SW on Kingston Drive	}	-	
	27 5.0 miles WSW Dine Cone Boad			
	38-4 9 miles W at Union Church Road	1	1	ł
	30-5 1 miles WNW King's Pond Road			
	55-0.2 miles SSE South of the West Sattling Pond	1	1	1
	56-0.4 miles NNW North of the center of the 7P-ISESI <sup>1,2</sup>			
	61-0.3 miles WSW West parking lot pear RR tracks <sup>2</sup>	1	1	1
	650.3 miles WNW Northwest of the 24P-ISFSI <sup>2</sup>			1

\*Control Station

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1 Required for monitoring of the 7P-ISFSI 2 Required for monitoring of the 24P-ISFSI

## SUMMARY OF RADIOLOGICAL MONITORING PROGRAM

The Radiological Environmental Monitoring Program (REMP) was conducted in accordance with the HBRSEP Off-Site Dose Calculation Manual (ODCM) and approved procedures.

The purpose of the REMP is to measure accumulation of radioactivity in the environment, to determine whether this radioactivity is the result of the operation of the HBRSEP, Unit No. 2, and to assess the potential dose to the off-site population based on the cumulative measurements of radioactivity of plant origin. Approximately 1,480 samples were collected from indicator and control locations and 1,600 analyses and measurements were made during 2012. Detectable radioactivity resulting from plant operation was found in 36 out of 36 indicator samples of surface water (Table 3). Only the tritium activity measured in the surface water of Lake Robinson and in fish samples constituted a source of public exposure. The highest concentration of any plant related radionuclide releases to the environment was tritium in Lake Robinson at an average concentration of 2.38E+3 pCi/Liter. Using the methodology of Regulatory Guide 1.109 "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, Revision 1, dated October 1977," via fish consumption, is listed below. The maximum possible exposure to an individual from the evaporation of tritium in Lake Robinson using 2012 meteorology is 0.186 mrem/yr. to a child.

Age Group	2012 Dose (mrem)
Adult	0.005
Teenager	0.004
Child	0.003

- 1. A statistical summary of all the data gathered in 2012 has been compiled in Table 3.
- 2. Radioactivity in environmental samples attributed to plant operations in 2012, for which there is a potential dose pathway to the public, is summarized in Table 4.
- 3. All detectable radionuclides in the environmental samples for 2012 were less than reporting levels as defined in HBRSEP ODCM. Table 5 summarizes the reporting levels.
- 4. Environmental sampling and analyses performed during 2012 demonstrated that the HBRSEP, Unit No. 2 continues to operate with minimum impact on the environment and minimal dose to the general public.

5. The following locations are used as control locations and are intended to indicate conditions away from the HBRSEP influence:

Thermoluminescent Dosimeters, Airborne and Particulate Samples

Surface Water

Bottom Sediment and Aquatic Vegetation

Fish

**Broadleaf Vegetation** 

**Food Products** 

24.4 miles ESE, Florence, S.C. (Location 1)

8.0 miles N, Black Creek at USHighway 1(Location 41)

7.2 miles NNW, Black Creek (upstream,)(Location 41)

Any lake not influenced by plant discharge (Location 47)

10 Miles W, near Bethune (Location 52)

10.0 miles W or greater than 5 Milesfrom plant(Location 49 - Bethune - site varies)

## TABLE 3

# H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP) RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM DATA SUMMARY

H. B. Robinson Steam Electric Plant, Unit No. 2 Darlington County, South Carolina

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Docket Number - 50-261 Calendar Year 2012

				Location w/Highest Annual Mean			
Medium or Pathway Sampled or Measured (Unit of Measurement)	Type and Total No. of Measurements Performed	Lower Limit of Detection (LLD) <sup>(1)</sup>	All Indicator Locations Mean Range <sup>(2)</sup>	Name, Distance, and Direction	Mean Range <sup>(2)</sup>	Control Locations Mean Range <sup>(2)</sup>	Number of Nonroutine Reported Measurements
Air Cartridge (pCi/m <sup>3</sup> )	I-131 529 <sup>(3)</sup>	5.1E-2	All less than LLD			All less than LLD	0
Air Particulate (pCi/m <sup>3</sup> )	Gross Beta 530 <sup>(3)</sup>	2.6E-3	2.31E-2 (477/477) 1.07E-2 - 4.18E-2	Microwave Tower 0.5 miles N	2.78E-2 (53/53) 1.68E-2 - 4.18E-2	2.30E-2 (53/53) 1.24E-2 - 3.70E-2	0
	Gamma 40	See Table 6	All less than LLD			All less than LLD	0
Aquatic Vegetation <sup>(5)</sup> (pCi/g. wet)	Gamma 4 Co-58	2.8E-2	1.78E-2 (1/3) Single value	Site varies within Lake Robinson	1.78E-2 (1/1) Single value	All less than LLD	0
	Co-60	2.6E-2	1.75E-2 (1/3) Single value	Site varies within Lake Robinson	1.75E-2 (1/3) Single value	All less than LLD	0
Broadleaf Vegetation (pCi/g, wet)	Gamma 75 <sup>(3)(4)</sup> Cs-137	3.2E-2	5.45E-2 (26/60) 1.49E-2 – 1.43E-1	Close to Site Boundary (BL-50) SSE	7.32E-2 (6/15) 2.08E-2 – 1.41E-1	4.83E-2 (8/15) 1.42E-2 – 1.02E-1	0
Fish Free-Swimmer (pCi/g, wet)	Gamma 6 K-40	5.9E-1	3.68E+0 (4/4) 3.00E+0 - 4.54E+0	Site varies within Lake Robinson	3.77E+0 (2/2) 3.00E+0 - 4.54E+0	3.34E+0 (2/2) 3.26E+0 - 3.42E+0	0
	Cs-137	7.4E-2	4.11E-2 (4/4) 3.52E-2 – 5.21E-2	Site varies within Prestwood Lake	4.36E-2 (2/2) 3.52E-2 – 5.21E-2	5.97E-2 (2/2) 4.20E-2 - 7.75E-2	0

# TABLE 3 (Cont.) HBRSEP RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM DATA SUMMARY

H. B. Robinson Steam Electric Plant, Unit No. 2 Darlington County, South Carolina Docket Number - 50-261 Calendar Year 2012

				Location w/Highest Annual Mean			
Medium or Pathway Sampled or Measured (Unit of Measurement)	Type and Total No. of Measurements Performed	Lower Limit of Detection (LLD) <sup>(1)</sup>	All Indicator Locations Mean Range <sup>(2)</sup>	Name, Distance, and Direction	Mean Range <sup>(2)</sup>	Control Locations Mean Range <sup>(2)</sup>	Number of Nonroutine Reported Measurements
Fish Bottom-Feeder (pCi/g, wet)	Gamma 6 K-40	5.9E-1	3.36E+0 (4/4) 2.51E+0 – 3.83E+0	Site varies within Prestwood Lake	3.54E+0 (2/2) 3.28E+0 - 3.79E+0	3.33E+0 (2/2) 3.27E+0 - 3.39E+0	0
	Cs-137	7.4E-2	3.17E-2 (4/4) 1.82E-2 – 4.35E-2	Site varies within Lake Robinson	4.04E-2 (2/2) 3.74E-2 – 4.35E-2	3.66E-2 (2/2) 3.12E-2 - 4.20E-2	0
Food Products (pCi/g, wet)	Gamma 4 <sup>(3)</sup> K-40	3.2E-1	2.89E+0 (2/2) 2.62E+0 - 3.15E+0	Site varies from Plant (FP-58)	2.89E+0 (2/2) 2.62E+0 - 3.15E+0	3.19E+0 (2/2) 2.21E+0 - 4.16E+0	0
	Cs-137	3.2E-2	All less than LLD			All less than LLD	0
Ground Water (pCi/l)	Gamma 60 <sup>(3)</sup>	See Table 6	All less than LLD			No control	0
3	Gross Beta 4	9.0E-1 <sup>(7)</sup>	1.59E+0 (3/4) 1.14E+0 – 2.11E+0	GW-82 (PDW-01) by Entrance Rd. to U/1 0.3 miles SSE	1.59E+0 (3/4) 1.14E+0 – 2.11E+0	No control	0
	I-131 8	See Table 6	All less than LLD			No control	0
	Tritium 60 <sup>(3)</sup>	2.2E+2 <sup>(7)</sup>	5.55E+2 (35/60) 2.19E+2 – 2.06E+3	GW-79 (TS-07C) S corner by cove & Discharge Canal 1.0 mile N	1.84E+3 (4/4) 1.72E+3 – 2.06E+3	No control	0

# TABLE 3 (Cont.) HBRSEP RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM DATA SUMMARY

H. B.	. Robinson Stean Darlington Co	n Electric Plant, U ounty, South Caro	nit No. 2 lina		Dock	tet Number - 50-26 Calendar Year	2012
				Location w/Highe	st Annual Mean		
Medium or Pathway Sampled or Measured (Unit of Measurement)	Type and Total No. of Measurements Performed	Lower Limit of Detection (LLD) <sup>(1)</sup>	All Indicator Locations Mean Range <sup>(2)</sup>	Name, Distance, and Direction	Mean Range <sup>(2)</sup>	Control Locations Mean Range <sup>(2)</sup>	Number of Nonroutine Reported Measurements
Shoreline Sediment (pCi/g, dry)	Gamma 4	See Table 6	All less than LLD			No Control	0
Bottom Sediment <sup>(5)</sup> (pCi/g, dry)	Gamma 4 Co-60	1.1E-1	1.05E-1 (1/3) Single value	Site varies within Prestwood Lake	1.05E-1 (1/1) Single value	All less than LLD	0
	Cs-137	9.5E-2	6.07E-1 (1/3) Single value	Site varies within Prestwood Lake	6.07E-1 (1/3) Single value	1.48E-1 (1/1) Single value	0

# TABLE 3 (Cont.)HBRSEPRADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM DATA SUMMARY

H. B. Robinson Steam Electric Plant, Unit No. 2 Darlington County, South Carolina Docket Number - 50-261 Calendar Year 2012

Medium or Pathway Sampled or Measured (Unit of Measurement)	Type and Total No. of Measurements Performed	Lower Limit of Detection (LLD) <sup>(1)</sup>	All Indicator Locations Mean Range <sup>(2)</sup>	<u>Location w/Hig</u> Name, Distance, and Direction	<u>thest Annual Mean</u> Mean Range <sup>(2)</sup>	Control Locations Mean Range <sup>(2)</sup>	Number of Nonroutine Reported Measurements
Surface Water (pCi/l)	Gamma 48	See Table 6	All less than LLD			All less than LLD	0
	Tritium 48	2.2E+2 <sup>(7)</sup>	1.93E+3 (36/36) 4.30E+2 – 6.12E+3	Black Creek at Old Camden Rd. 0.6 miles ESE	2.38E+3 (12/12) 5.42E+2 - 6.12E+3	All less than LLD	0
TLD (mR/qtr) <sup>(6)</sup>	TLD 170 <sup>(3)</sup>	N/A	1.35E+1 (166/166) 8.90E+0 - 1.99E+1	Kelly Bridge Road 4.5 miles SSW	1.89E+1 (4/4) 1.81E+1 - 1.99E+1	1.21E+1 (4/4) 1.16E+1 - 1.26E+1	0

#### **FOOTNOTES TO TABLE 3**

- Lower Limit of Detection (LLD) is the smallest concentration of radioactive material in a sample that will yield a net count above system background that will be detected with 95 percent probability with only 5 percent probability of falsely concluding that a blank observation represents a "real" signal. Due to counting statistics and varying volumes, occasionally lower LLDs are achieved. Refer to Analytical Procedures Section/Gamma Spectrometry for an explanation of how LLD values were derived.
- 2. Mean and range are based on detectable measurements only. The fractions of detectable measurements at specific locations are indicated in parentheses.
- 3. Missing samples are discussed in Missed Surveillances.
- 4. Three types of broadleaf vegetation samples are collected monthly when available from four locations for a possible total of 144 samples.
- 5. Bottom sediment and aquatic vegetation sampling are not required by plant Offsite Dose Calculation Manual (ODCM). Sampling and analysis is performed to monitor any radionuclide accumulation in the lake.
- TLD exposure is reported in milliroentgen (mR) per 90-day period (quarter) beginning in 1995. This is the exposure standard (mR/std. qtr.) used to compare data to the Nuclear Regulatory commission (NRC).
- 7. The tritium LLD was lowered to approximately 2.20E+2 pCi/L for samples that typically demonstrate activity less than the LLD (groundwater and surface water control). The LLD was lowered to be consistent with the LLD used by the state laboratory. Other samples that typically exhibit activity greater than the LLD have a tritium Lower Limit of Detection (LLD) of 1.0E+3 pCi/L.

# TABLE 4

## Potential Dose Pathways

Sample Media	Radionuclide	Highest Annual Mean (Average) Concentration and Occurrence	Maximum Individual Dose
Surface Water	Н-3	2.38E+3 (pCi/L) (12/12)	0.005 millirem/yr - Adult (from fish)
Surface Water	Н-3	2.38E+3 (pCi/L) (12/12)	0.186 millirem/yr - child (Evaporation from Lake Robinson using RNP 2012 Meteorology Data)*

\*This is information supplied by Murrey & Trettle, INC in their report "Impact of Tritium Release from Lake Robinson at the RNP for 2012.

## TABLE 5

## **Reporting Levels for Radioactivity Concentrations**

# in Environmental Samples

Radionuclide	Water (pCi/l)	Airborne (pCi/m³)	Fish (pCi/kg, wet)	Milk (pCi/l)	Food Products (pCi/kg, wet)
H-3	2E+04ª				
Mn-54	1E+03	·	3E+04		
Fe-59	4E+02		1E+04		
Co-58	1E+03		3E+04		
Co-60	3E+02		1E+04		
Zn-65	3E+02		2E+04		
Zr-Nb-95	4E+02				
I-131	2E+00 <sup>b</sup>	9E-01		3E+00	1E+02
Cs-134	3E+01	1E+01	1E+03	6E+01	1E+03
Cs-137	5E+01	2E+01	2E+03	7E+01	2E+03
Ba-La-140	2E+02			3E+02	

<sup>a</sup>For drinking water samples. This is a 40 CFR Part 141 value. If no drinking water pathway exists, a value of 30,000 pCi/L may be used.

<sup>b</sup>If no drinking water pathway exists, a value of 20 pCi/L may be used.

## INTERPRETATIONS AND CONCLUSIONS

#### Air Sampling

There was no I-131 (lodine - 131) detected in any of the 476 air cartridges (AC) samples from the indicator locations and 53 air cartridges from the control location in 2012. There was one indicator air cartridge missing in 2012, refer to the Missed Surveillance Section (CR # 552047) and 552044). The air samplers operated for a total of 99.62% availability for the 2012 year.

For the period of January 1, 2012, to December 31, 2012, the gross beta activity was detectable in all airborne particulate (AP) samples, with acceptable runtime, from the nine indicator locations. The 477 indicator samples had an average concentration of  $2.31E-2 \text{ pCi/m}^3$ . Similar gross beta activities were observed at the control location in Florence, which had an average concentration of  $2.30E-2 \text{ pCi/m}^3$  in 53 control samples. Figures 4 through 12 provide a graphic representation of the gross beta activity at the indicator locations compared to the control location for the year 2012. AP weekly samples that exhibit an elevated gross beta activity above the set administrative limits typically have a gamma isotopic analysis done with the results indicating all natural gamma activity. No plant-related gamma activity was observed for any air particulates during 2012. The natural gamma concentrations are typical of the natural environment and are not attributed to plant operations. Refer to the Missed Surveillance Section on the AC and AP Missed Surveillances in the 2012 collection year (CR # 523913, 537120, 546968, 546975, 548017, 549350, 549929, 552047, 552044, and 553115).

The quarterly composite gamma analyses for air particulate samples for all quarters revealed no plant-related gamma activity for either the indicator or control locations. Typical/worst case LLDs for air particulates are contained in Table 6.

#### **Broadleaf Vegetation**

Broadleaf vegetation sampling is accomplished by collecting cherry, sassafras, and wax myrtle leaves in 2012. Three species of samples, when available, are collected monthly at five locations (one control and four indicator locations at the site boundary selected using historical meteorology with the highest calculated annual average ground level deposition). Broadleaf

sampling is conducted since no milk animals are located within a radius of approximately five miles of the plant and is used to simulate dose to an individual via the milk pathway for compliance purposes.

During 2012, 26 of 60 samples taken from the indicator sites demonstrated detectable concentrations of Cs-137 for an average value of 5.45E-2 pCi/g (wet). The control samples had detectable concentrations of Cs-137 in 8 of 15 samples with a mean concentration of 4.83E-2 pCi/g (wet). Upon comparing these results, it is concluded that the indicator values reflect fallout Cs-137 contamination. Past sampling experience further supports this interpretation. Refer to the Missed Surveillance Section for missed (unavailable) surveillances (CR # 512780, 520549, 535810, 535514, 565655, 572323, and 576990).

#### <u>Fish</u>

Samples of free-swimming and bottom-feeding fish were taken from Lake Robinson and Prestwood Lake (the first downstream lake) and compared to similar fish from a control lake, which is unaffected by plant operation. During 2012, 4 out of 4 bottom-feeding fish and 4 out of 4 free-swimming fish (indicator sites) demonstrated detectable concentrations of Cs-137 for an average value of 3.17E-2 pCi/g (wet) and 4.11E-2 pCi/g (wet), respectively. The control samples had detectable concentrations of Cs-137 for 2 out of 2 bottom-feeding fish and 2 out of 2 free-swimming fish for an average concentration of 3.33E-2 pCi/g (wet) and 5.97E-2 pCi/g (wet), respectively. Upon comparing these results, it is concluded that the indicator values reflect fallout Cs-137 contamination. Past sampling experience further supports this interpretation.

#### **Ground Water**

No by-product/plant-related gamma activity associated with plant operations was detected in the sixty (60) samples of ground water collected in 2012. The ground water samples had detectable concentrations of tritium activity in thirty-five (35) out of sixty (60) samples, for an average concentration of 5.55E+2 pCi/L; with a range of 2.19E+2 pCi/L to 2.06E+3 pCi/L. During 2012, eight (8) ground water samples were analyzed for 1-131 to the Drinking water levels (<1 pCi/L). No detectable concentrations of I-131 activity were detected in the eight samples.

#### <u>Milk</u>

Milk monitoring has not been conducted due to the unavailability of milk samples in the area since July 17, 1998, when the dairy ceased operation. Milk sampling will resume if a new sample location is identified. Broadleaf sampling is conducted since no milk animals are located within a radius of approximately five miles of the plant in any sector and is used to calculate dose to an individual via the vegetation-milk-man pathway. Refer to Broadleaf Vegetation Section for additional information.

#### Food Products

During 2012, food product (FP) samples (cabbage and collards) were obtained from the control location (FP-49) and from the indicator location (FP-58). No gamma activity associated with plant operation was detected in any control or indicator samples.

#### **Shoreline Sediment**

In 2012, no gamma activity associated with plant operation was detected in any sample in the semiannual shoreline sediment samples. Only naturally occurring gamma activity was detected. No Cs-137 activity was detected in 2012; however, Cs-137 activity identified in past years was attributed to worldwide fallout and not the plant operation.

#### **Bottom Sediment**

The bottom sediment samples are used as indicators of buildup of radioactivity in the environment and do not constitute a dose pathway. Cs-137 activity was detectable in one of the three indicator bottom sediment samples in 2012, with a single concentration of 6.07E-1 pCi/g (dry). The control sample indicated detectable Cs-137 activity with a concentration of 1.48E-1 pCi/g (dry). Cobalt-60 (Co-60) activity was detectable in one of the three indicator samples with a single concentration of 1.05E-1 pCi/g (dry). The Co-60 in the bottom sediment is attributed to plant operation. This concentration is similar to previous years and does not indicate a buildup in the environment. No other gamma activity, except for naturally occurring gamma activity, was detected in the annual bottom sediment samples in 2012.

#### **Aquatic Vegetation**

The aquatic vegetation samples are considered to be sensitive environmental indicators used as long term trending and do not constitute a dose pathway. In 2012, there were three aquatic vegetation indicator samples and one aquatic vegetation control sample collected. The aquatic vegetation samples collected pose no dose consequence since this is not a dose pathway to the public. Cobalt-58 (Co-58) activity was detected in one out of three indicator samples with a single concentration of 1.78E-2 pCi/g (wet) in 2012. Cobalt-60 (Co-60) activity was detected in one out of three indicator samples, with a single concentration of 1.75E-2 pCi/g (wet). The Co-58 and Co-60 in the aquatic vegetation are attributed to plant operation. No other gamma activity, except natural occurring gamma activity, was detected in the aquatic vegetation samples in 2012.

#### Surface Water

Surface waters of Lake Robinson indicated the presence of tritium which is attributed to plant operation. This tritium activity is cyclic and follows the Robinson Plant fuel cycle. Figure 13 displays the tritium activity throughout 2012. These surface waters do not supply drinking water at any downstream location and are not used for irrigation. Therefore, radiological dose via this pathway is limited to the consumption of fish (0.005 mrem/yr.) and evaporation of tritium (0.186 mrem/yr. using RNP 2012 Meteorology Data) from Lake Robinson and its subsequent inhalation and ingestion from vegetable gardens and meat producing animals. Using the methodology of Regulatory Guide 1.109, a dose of 0.191 millirem/year to the maximum exposed individual could be assigned to this pathway.

The monthly composite gamma analyses for surface water samples revealed no radionuclides typical of plant effluents, only natural occurring gamma activity.

#### **External Radiation**

Direct radiation exposure in the HBRSEP environs was measured by the placement of thermoluminescent dosimeters (TLDs) around the plant forming an inner ring at approximately 1 mile and an outer ring at approximately 5 miles. The average of inner versus outer ring dose measurements is shown on Figure 14.

## Asiatic Clams

Benthic samples from Lake Robinson during 2012 continue to confirm the absence of any substantial populations of Asiatic clams (*Corbicula fluminia*). The natural chemistry of the lake (i.e., low alkalinity and hardness) inhibits their proliferation.

## **MISSED SURVEILLANCES**

#### Air Cartridge and Air Particulates

Any REMP weekly air samples (Air Cartridge – AC or Air Particulate – AP (APAC)) that exceed 30 hours of down time in a surveillance period will be reported as a "missed surveillance". However, this sample will still be counted and the data reported; whereas a "missed sample" indicates that no sample was available and no data was reported.

All AP and AC samples were available for counting, except for one AC sample (AC-5 as stated in the Missed Samples section below) in 2012.

Missed Samples:

• AC-5, July 30 – Total down time was 160.4 hours. The air sampler was found not running. The fuse was replaced and switched on, but it didn't start. Unit was turned off and a work order was written (CR# 552044 and 552047).

Missed Surveillances:

 APAC-55, March 5 - 12 – Total down time was 90.0 hours. The air sampler was found not running as a result of a blown fuse. The fuse was replaced and the air sampler was back in service (CR # 523913).

Other down time in May, June, and July of 2012 was identified APAC-55 that did not meet the definition of "missed surveillances" and the information pertaining to these events can be found in the corrective action program (CR # 537120, 546968, 548017, 549350, and 549929). APAC-4 and APAC-5 had down time identified in June and August in 2012 that did not meet the definition of "missed surveillances" (CR # 546975 and 548017).

#### **Broadleaf Vegetation**

Broadleaf vegetation (BL) samples were not available during the months of January, February, March, April, October, November, and December of 2012 due to the seasonal nature of broadleaf vegetation (CR # 512780, 520549, 535810, 535514, 565655, 572323, and 576990).

## **Thermoluminescent Dosimeters (TLDs)**

1

Two out of the possible 172 TLD samples were missing during 2012.

- First Quarter TLD # 11 was missing in the field and could not be located (CR # 531975).
- First Quarter TLD # 27 was missing in the field and could not be located (CR # 531975).

## ANALYTICAL PROCEDURES

#### **Gross Beta**

Gross beta radioactivity measurements are made utilizing a Tennelec Low-Background Alpha/Beta Counting System. The LLD for air particulates is approximately 2.6E-3 pCi/m<sup>3</sup> for RNP samples. Air particulate samples are mounted in 2-inch stainless steel planchets and typically counted directly for 50 minutes.

Gross beta activity in ground water is determined by evaporating 1.0 Liter of the sample, transferring it to a weighed planchet, and counting the planchet on a Tennelec Low-Background Alpha/Beta Counting System for 50 minutes. Typical/worst case LLD for gross beta is 9.0E-1 pCi/L.

#### <u>Tritium</u>

Liquid samples requiring tritium analysis are treated with a small amount of sodium hydroxide, potassium permanganate crystals, and then distilled. Five milliliters of the distillate are mixed with thirteen milliliters of liquid scintillation cocktail and counted in a liquid scintillation counter typically for 400 minutes. The lower LLD (approximately 2.20E+2 pCi/L) was established for consistency with the state laboratory for valid comparisons.

#### Iodine-131

lodine-131 airborne concentrations are analyzed by the high-purity germanium (Ge) gamma spectrometry systems. The cartridges are placed on the detector and each charcoal cartridge is typically counted for 900 seconds individually with an approximate LLD of 5.1E-2 pCi/m<sup>3</sup>.

Iodine-131 in ground water is determined by an instrumental method. Analysis involves passing 4 liters of sample over an anion exchange resin and direct gamma analysis of the resin with a high-purity Ge detector. The LLD using the Ge detector is approximately 7.9E-1 pCi/L using 40,000-second count time. Refer to Table 6 for Typical/Worst Case LLDs.

#### **Gamma Spectrometry**

Gamma spectrum analysis uses high-purity germanium detectors with thin aluminum windows housed in steel and lead shields. The analyzer system is the Canberra APEX Gamma Spectroscopy System. Table 6 summarizes worst case LLD values derived from using the instrument with the worst sensitivity, typical sample volumes, typical count times, typical worst background count, and worst case on decay (from collection to counting).

Air particulate quarterly composite filters are placed in a Petri dish and analyzed directly for a typical count time of 900 seconds.

Liquid samples are transferred to Marinelli beakers and analyzed by gamma counting. One-liter ground water samples are gamma scanned directly in a 1-Liter Marinelli beaker for 14,000 seconds and the surface water samples for 73,000 seconds.

Shoreline and bottom sediments are dried, ground, weighed, and then analyzed in a 1-liter Marinelli beaker for 840 seconds (>1000 grams, dry) or 1,380 seconds (≤1000 grams, dry).

Broadleaf and aquatic vegetation and food product samples are weighed as sampled (wet) and analyzed in a Marinelli beaker for typically 7,500 seconds.

Fish samples are prepared by placing small raw, edible portions of the fish in a 1-liter Marinelli beaker for gamma analysis and are typically counted for 1,500 seconds.

#### **Thermoluminescent Dosimetry**

Each area monitoring station includes a TLD packet, which is a polyethylene bag containing three calcium sulfate phosphors contained in a Panasonic UD-814 badge. The TLD is light tight and the bag is weather-resistant.

Dosimeters are machine annealed before field placement. Following exposure in the field, each dosimeter is read utilizing a Panasonic TLD reader. This instrument integrates the light photons emitted from traps as the dosimeter is heated. Calibration is calculated using dosimeters irradiated to known doses for each set of dosimeters measured. Prior to the measurement of each dosimeter, the instrument is checked through use of an internal constant light source as a

secondary standard. The exposure reported is corrected for exposure received in transit and during storage through the use of control dosimeters.

#### **Interlaboratory Comparison Program**

The Radiochemistry Laboratory at the Harris Energy & Environmental Center in New Hill, North Carolina, provides radioanalytical services for Progress Energy Carolinas, Inc.'s nuclear plant radiological environmental surveillance programs. In fulfillment of ODCM Operational Requirements, the laboratory is a participant in the Eckert & Ziegler Analytics Environmental Cross Check Program and uses its performance in this program as a major determinant of the accuracy and precision of its analytical results.

The Interlaboratory Comparison Program entails measurements on each instrument that is used to determine concentrations of radioactive material in the various media that are analyzed as part of the REMP. From these individual measurements, average results are calculated for each sample medium. During 2012, 64 average results were reported for the year on 14 samples representing seven major environmental media (i.e., water, milk, air filters, air filters composite, soil, air cartridges, and simulated vegetation). Data on the known activities, the uncertainties, and the ratios to the known for the 64 average results have been received from Eckert & Ziegler Analytics. The results were compared to the criteria established in the NRC Inspection Manual (Procedure 84750) for Radioactive Waste Treatment, Effluent, and Environmental Monitoring (see below results).

All of the 64 average results were within the acceptance criteria for 2012, except for one (second quarter gamma filter sample E10146). During 2012, there were 300 individual measurements of which 295 (98.3%) were passing. The individual measurements were evaluated and results falling outside the acceptable ratio criteria had an evaluation performed to identify any recommended remedial actions and to reduce anomalous errors (CR # 566790). Complete documentation of any evaluation will be available and provided to the NRC upon request.

Sample	Nuclide	Quarter	Units	HEEC Value	EZA Value	HEEC/EZA Ratio	Evaluation
Gross beta water	Gross beta	1 st	pCi/L	312	285	1.09	Agreement
1 <sup>st</sup> Qtr E10030 3 <sup>rd</sup> Qtr E10170		3 <sup>rd</sup>	pCi/L	274	251	1.09	Agreement
Gross beta filter	Gross beta	2 <sup>nd</sup>	pCi	67.4	62.9	1.07	Agreement
2 <sup>nd</sup> Qtr E10147 4 <sup>th</sup> Qtr E10173		4 <sup>th</sup>	pCi	44.0	42.3	1.04	Agreement
Tritium in water	H-3	1 <sup>st</sup>	pCi/L	4360	4470	0.97	Agreement
1 <sup>st</sup> Qtr E10033 4 <sup>th</sup> Qtr E10174		4 <sup>th</sup>	pCi/L	11672	12100	0.96	Agreement
Iodine Cartridge	I-131	2 <sup>nd</sup>	pCi	94.0	96.9	0.97	Agreement
2 <sup>nd</sup> Qtr E10145 4 <sup>th</sup> Qtr E10172	[	4 <sup>th</sup>	pCi	71.5	72.4	0.99	Agreement
Gamma Milk	Cr-51	1 <sup>st</sup>	pCi/L	436	436	1.00	Agreement
1 <sup>st</sup> Qtr E10031	Mn-54	1 <sup>st</sup>	pCi/L	213	195	1.09	Agreement
	Co-58	1 <sup>st</sup>	pCi/L	136	132	1.03	Agreement
	Fe-59	1 st	pCi/L	185	168	1.10	Agreement
,	Co-60	1 <sup>st</sup>	pCi/L	293	279	1.05	Agreement
	Zn-65	1 <sup>st</sup>	pCi/L	357	333	1.07	Agreement
	1-131	1 <sup>st</sup>	pCi/L	91	92.5	0.99	Agreement
	Cs-134	1 <sup>st</sup>	pCi/L	142	149	0.95	Agreement
	Cs-137	1 <sup>st</sup>	pCi/L	166	159	1.04	Agreement
	Ce-141	1 <sup>st</sup>	pCi/L	260	260	1.00	Agreement
Gamma Soil	Cr-51	1 <sup>st</sup>	pCi/g	0.620	0.618	1.00	Agreement
1 <sup>st</sup> Qtr E10032	Mn-54	1 <sup>st</sup>	pCi/g	0.300	0.277	1.08	Agreement
	Co-58	1 <sup>st</sup>	pCi/g	0.190	0.187	1.02	Agreement
	Fe-59	1 <sup>st</sup>	pCi/g	0.271	0.238	1.14	Agreement
	Co-60	1 <sup>st</sup>	pCi/g	0.422	0.395	1.07	Agreement
	Zn-65	1 <sup>st</sup>	pCi/g	0.505	0.471	1.07	Agreement
	I-131	1 st	pCi/g	0.218	0.212	1.03	Agreement
	Cs-134	1 <sup>st</sup>	pCi/g	0.337	0.313	1.08	Agreement
	Cs-137	1 <sup>st</sup>	pCi/g	0.389	0.369	1.06	Agreement
Gamma	Cr-51	3 <sup>rd</sup>	pCi/g	0.561	0.583	0.96	Agreement
Vegetation	Mn-54	3 <sup>rd</sup>	pCi/g	0.460	0.460	1.00	Agreement
3 <sup>rd</sup> Qtr E10171	Co-58	3 <sup>rd</sup>	pCi/g	0.234	0.236	0.99	Agreement
	Fe-59	3 <sup>rd</sup>	pCi/g	0.373	0.357	1.04	Agreement
	Co-60	3 <sup>rd</sup>	pCi/g	0.358	0.357	1.00	Agreement
	Zn-65	3 <sup>rd</sup>	pCi/g	0.465	0.452	1.03	Agreement
	I-131	3 <sup>rd</sup>	pCi/g	0.238	0.255	0.94	Agreement
	Cs-134	3 <sup>rd</sup>	pCi/g	0.467	0.410	1.14	Agreement
	Cs-137	3 <sup>rd</sup>	pCi/g	0.364	0.385	0.95	Agreement

# **Environmental Cross Check Performance Summary for 2012**

Sample	Nuclide	Quarter	Units	HEEC	EZA	HEEC/EZA	Evaluation
-				Value	Value	Ratio	
Gamma Filter	Cr-51	2 <sup>nd</sup>	pCi	266	250	1.06	Agreement
2 <sup>nd</sup> Qtr E10146	Mn-54	2 <sup>nd</sup>	pCi	94	82.3	1.14	Agreement
	Co-58	2 <sup>nd</sup>	pCi	61	57.5	1.06	Agreement
	Fe-59	2 <sup>nd</sup>	pCi	94	79.5	1.19	Agreement
	Co-60	2 <sup>nd</sup>	pCi	234	221	1.06	Agreement
	Zn-65	2 <sup>nd</sup>	pCi	158	124	1.28	Disagreement
	Cs-134	2 <sup>nd</sup>	pCi	110	109	1.01	Agreement
	Cs-137	2 <sup>nd</sup>	pCi	142	132	1.08	Agreement
	Ce-141	2 <sup>nd</sup>	pCi	52	51.2	1.02	Agreement
Gamma 13 Filter	Cr-51	2 <sup>nd</sup>	pCi	332	312	1.07	Agreement
Composite	Mn-54	2 <sup>nd</sup>	pCi	114	103	1.10	Agreement
2 <sup>nd</sup> Qtr E10144	Co-58	2 <sup>nd</sup>	pCi	75	71.8	1.04	Agreement
	Fe-59	2 <sup>nd</sup>	pCi	117	99.4	1.18	Agreement
	Co-60	2 <sup>nd</sup>	pCi	288	276	1.04	Agreement
	Zn-65	2 <sup>nd</sup>	pCi	184	155	1.19	Agreement
	Cs-134	2 <sup>nd</sup>	pCi	123	136	0.91	Agreement
	Cs-137	2 <sup>nd</sup>	pCi	175	165	1.06	Agreement
	Ce-141	2 <sup>nd</sup>	pCi	65	63.9	1.01	Agreement
Gamma Water	Cr-51	3 <sup>rd</sup>	pCi/L	398	380	1.05	Agreement
2 <sup>nd</sup> Qtr E10169	Mn-54	3 <sup>rd</sup>	pCi/L	319	300	1.06	Agreement
	Co-58	3 <sup>rd</sup>	pCi/L	163	154	1.06	Agreement
	Fe-59	3 <sup>rd</sup>	pCi/L	258	233	1.11	Agreement
	Co-60	3 <sup>rd</sup>	pCi/L	249	233	1.07	Agreement
1	Zn-65	3 <sup>rd</sup>	pCi/L	317	295	1.08	Agreement
	I-131	3 <sup>rd</sup>	pCi/L	101	99.9	1.01	Agreement
	Cs-134	3 <sup>rd</sup>	pCi/L	164	166	0.99	Agreement
	Cs-137	3 <sup>rd</sup>	pCi/L	276	267	1.03	Agreement
	Ce-141	3 <sup>rd</sup>	pCi/L	253	251	1.01	Agreement

# **Environmental Cross Check Performance Summary for 2012**

# Lower Limits of Detection

The samples analyzed met the "a priori" LLD required by the ODCM. Typical/Worst Case "a priori" LLD values for the samples analyzed are listed in Table 6.

# Table 6

# Typical/Worst Case Lower Limits of Detection (a priori)

Surface Water/Groundwater Samples						
Isotope	LLD (pCi/L)					
Mn-54	3/6					
Co-58	3 / 6					
Fe-59	6 / 12					
Co-60	2/7					
Zn-65	5 / 12					
Zr-Nb-95	5 - 4 / 11 - 10					
I-131	14 / 13					
Cs-134	3/7					
Cs-137	3/6					
Ba-La-140	23 - 8 / 31 - 12					
I-131 (Separation)	0.86 / 0.79					
Air Cartrie	dges					
(Weekly	/)					
Isotope	LLD (pCi/m <sup>3</sup> )					
I-131	0.051					
Air Particu	lates					
(Quarterly Cor	mposite)					
Isotope	LLD (pCi/m <sup>3</sup> )					
Cs-134	3.1E-3					
Cs-137	2.2E-3					

# **Gamma Spectrometry**

# Table 6 (cont.)

<u>Sediments</u> (Shoreline or Bottom)								
Isotope	LLD (pCi/kg, dry)							
Cs-134	125							
Cs-137	94							
<u> </u>								
Isotope	LLD (pCi/kg, wet)							
Mn-54	60							
Co-58	70							
Fe-59	142							
Co-60	66							
Zn-65	127							
Cs-134	73							
Cs-137	74							
Food Products and Veg	retation / Aquatic							
Isotope	LLD (pCi/kg, wet)							
I-131	45 / 41							
Cs-134	34 / 29							
Cs-137	32 / 20							
	l							

# LAND USE CENSUS

## **PURPOSE OF THE LAND USE CENSUS**

The land use census identifies the pathways (or routes) that radioactive material may reach the general populations near commercial nuclear generating stations. This is accomplished by completing studies that identify how the surrounding lands are used by the population. A comprehensive census of the use of the land within a five-mile distance of the plant is completed during the growing season. This information is used for dose assessment and to identify changes to the stations sampled and the type of samples. These results ensure that the Radiological Environmental Monitoring Program (REMP) is based upon current data regarding human activity in the vicinity of the plant. Therefore, the purpose of the land use census is to ensure the monitoring program is current, as well as to provide data for the calculation of estimated radiation exposure.

The pathways that are evaluated are:

- Ingestion Pathway Results from eating food products that may have radioactive materials deposited on them, incorporated radioactive materials from the soil or atmosphere. Another pathway is through drinking milk from local cows or goats if present. The grass used to feed these animals may have incorporated or had deposited on it radioactive materials that can be transferred to the milk.
- Direct Radiation Exposure Pathway- Results from deposition of radioactive materials on the ground or from passage of these radioactive materials in the air.
- Inhalation Pathway- Results from breathing radioactive materials transported in the air.

# Methodology

The following must be identified within the five (5) mile radius of the plant for each of the sixteen meteorological sectors (compass direction the winds may blow, for example NNE [North North East]):

- The nearest resident
- The nearest garden of greater that 500 square feet, producing broadleaf vegetables
- The nearest milk animal
- The nearest meat/egg producing animal

The primary methods are visual inspection from the roadside within the five (5) mile radius and personal contact with the individuals.

## Land Use Census Results

The HBRSEP (RNP) Land Use Census was performed August 2012 to meet the requirements of the HBRSEP's ODCM. The last HBRSEP land use census was performed in July 2011. The 2012 and 2011 results of the survey for the nearest resident, garden, milk producing animal, and meat/egg producing animal for each meteorological sector are compared in Table 7.

No milk producing animals were identified within the five-mile radius of the site in any sector. Milk sampling will resume if a new sample location is identified. Also, no garden (at the time of the census) is currently growing leafy vegetables. Vegetables like tomatoes, squash, okra, cucumbers, etc. are examples of the vegetables of choice for this area and are what is typically grown and sampled in the past. Sampling of these vegetables (non-leafy) will continue until leafy vegetables can be identified. The results of the 2012 Land Use Census and 10 year average meteorological data were reviewed. No changes in release pathways were identified as a result of the land use census that would require an ODCM change, additional dose calculations, or procedure changes were identified.

# TABLE 7

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

SECTOR	RES	IDENT	GARDEN		MEAT/ EGG		MILK	
	2011	2012	2011	2012	2011	2012	2011	2012
N	2.81	2.81	3.29	3.29*	4.75	4.75		
NNE	1.51	1.51	2.08	2.08*	2.59	2.71*		
NE	1.03	1.03	1.10	2.71*				
ENE	0.83	0.83	1.07	1.07	2.44	*		
E	0.90	0.90	1.05	1.05	2.98	2.98		
ESE	0.62	0.62	1.28	1.28	0.70	*		
SE	0.38	0.38	1.20	1.80*	2.00	2.00		
SSE	0.33	0.33	2.37	2.37	2.37	2.37		
S	0.40	0.40	2.25	2.25	2.62	2.62		
SSW	0.37	0.37	0.84	0.84	0.84	0.93*		
SW	0.46	0.46	0.79	*	3.54	*		
wsw	0.45	0.45	0.88	0.88	0.88	0.88		
W	0.54	0.54	0.70	0.70	0.84	*		
WNW	0.60	0.60	0.83	0.83	4.27	4.27		
NW	1.59	1.59	2.43	2.49*	2.07	2.40*		
NNW	2.04	2.04	3.80	3.80				

# LAND USE CENSUS COMPARISONS (2011-2012) NEAREST PATHWAY (MILES)

\*Changes or new locations from 2011.

\*\*Changes in mileage due to GPS readings.





















# Figure 13 RNP 2012 Surface Water Tritium

Dates



# Figure 14 RNP 2012 TLD Averages for Inner and Outer Ring Locations

Dates

# HBRSEP (RNP)

# TLD Report

• 9 pages

# Analysis Report • 49 pages

# Gamma Isotopic Report

• 87 pages

# APPENDIX

This appendix addresses the non-compliance of the RNP ODCM requirements for ground water I-131 LLDs in the 2010 RNP Radiological Environmental Operating Report (REOR) in the Ground Water Sections in the Interpretations and Conclusions Section and in the Missed Surveillances Section. It also addresses the ground water reference in the Lower Limit of Detection Section. Additional information can be found in CR# 539077, 498969, 406845, and 372057.

### **INTERPRETATIONS AND CONCLUSIONS**

#### Air Sampling

Air samples collected during 2010 had a mean gross beta activity of 2.42E-2 pCi/m<sup>3</sup> for the indicator stations versus an average concentration of 2.62E-2 pCi/m<sup>3</sup> for the control stations. These data are essentially unchanged from 2009 and reflect the occurrence of naturally occurring radionuclides of the region. The lower current value is primarily due to the reduction of worldwide fallout that was occurring during the pre-operational years. Figures 6 through 14 provide a graphic representation of the gross beta activity at the indicator locations compared to the control location for 2010. These figures confirm that the indicator stations show no significant increase over the control samples and hence no discernible impact from the plant operation is apparent in the data. Air samplers that experienced down time of greater than 30 hours in a surveillance period are referred to as missed surveillances and discussions can be located in the Missed Surveillances Section of this report. The air samplers operated for 99.85% of the 2010 year.

The quarterly composite gamma analyses for air particulate samples for all quarters revealed no radionuclides typical of plant effluents.

There was no Iodine-131 (I-131) detected in any of the 468 air cartridge (AC) samples from the indicator stations and 52 air cartridges from the control location in 2010.

#### **Broadleaf Vegetation**

Broadleaf vegetation sampling is accomplished by collecting cherry, sassafras, and wax myrtle leaves in 2010. Three species of samples, when available, are collected monthly at five locations (one control and four indicator locations at the site boundary selected using historical meteorology with the highest calculated annual average ground level deposition). Broadleaf sampling is conducted since no milk animals are located within a radius of approximately five miles of the plant and is used to simulate dose to an individual via the milk pathway for compliance purposes.

During 2010, 31 of 72 samples taken from the indicator sites demonstrated detectable concentrations of Cs-137 for an average value of 5.19E-2 pCi/g (wet). The control samples had detectable concentrations of Cs-137 in 8 of 18 samples with a mean concentration of 3.38E-2 pCi/g (wet). Upon comparing these results, it is concluded that the indicator values reflect fallout Cs-137 contamination. Past sampling experience further supports this interpretation.

#### <u>Fish</u>

Samples of free-swimming and bottom-feeding fish were taken from Lake Robinson and Prestwood Lake (the first downstream lake) and compared to similar fish from a control lake, which is unaffected by plant operation. During 2010, 3 out of 4 bottom-feeding fish and 4 out of 4 free-swimming fish (indicator sites) demonstrated detectable concentrations of Cs-137 for an average value of 4.28E-2 pCi/g (wet) and 3.51E-2 pCi/g (wet), respectively. The control samples had detectable concentrations of Cs-137 for 1 out of 2 bottom-feeding fish and 2 out of 2 free-swimming fish for an average concentration of 7.28E-2 pCi/g (wet) and 6.16E-2 pCi/g (wet), respectively. Upon comparing these results, it is concluded that the indicator values reflect fallout Cs-137 contamination. Past sampling experience further supports this interpretation.

#### Ground Water

No gamma activity associated with plant operations was detected in the sixty-two (62) samples of ground water collected in 2010. The ground water samples had detectable concentrations of tritium activity in forty-five (45) out of sixty-two (62) samples, for an average concentration of 7.10E+2 pCi/L with a range of 2.05E+2 pCi/L to 2.55E+3 pCi/L. During 2010, four (4) ground water samples were analyzed for I-131 to the drinking water levels (<1 pCi/L). No detectable concentrations of I-131 activity were detected in the four samples.

The first quarter 2010 ground water (GW) monitoring wells 42, 64, and 69 - 81 were analyzed for I-131 using gamma spectrometry to the non-drinking water levels (15 pCi/L) in accordance with RNP's procedures. However, during this time frame, the RNP ODCM Revision 30 I-131 requirement was for drinking water levels (<1 pCi/L); therefore, the above mentioned GW samples were not analyzed to this lower level. No detectable concentrations of I-131 were

detected in these fifteen wells. These wells are not drinking water wells (NCR # 539077, 498969, 406845, and 372057). These discrepancies between the RNP procedures and the ODCM Revision 30 were corrected with Revision 31 of the RNP ODCM (May 10, 2010): therefore, second quarter 2010 GW samples were analyzed to the correct limits per RNP procedures and ODCM requirements.

Sample point #82 was added to Revision 32 of the ODCM in 12/10. The sampling data for that well was added to the 2010 Annual Effluent Report, since the sampling was accomplished prior to being included in the ODCM.

#### <u>Milk</u>

Broadleaf sampling is conducted since no milk animals are located within a radius of approximately five miles of the plant in any sector and is used to calculate dose to an individual via the vegetation-milk-man pathway. The only radionuclide detected was Cesium-137 at approximately the same concentration and frequency of detection as the control location samples.

#### **Food Products**

During 2010, food product samples (collards and tomatoes) were obtained from the control location (FP-49) and from the indicator location (FP-58). No gamma activity associated with plant operation was detected in any control or indicator samples.

#### Shoreline Sediment

In 2010, no gamma activity associated with plant operation was detected in any sample in the semiannual shoreline sediment samples. Only naturally occurring gamma activity was detected. Cs-137 activity seen in past years was attributed to worldwide fallout and not the plant operation. No Cs-137 activity was detected in 2010.

#### **Bottom Sediment**

The bottom sediment samples are used as indicators of buildup of radioactivity in the environment and do not constitute a dose pathway. Cs-137 activity was detectable in two of the three indicator bottom sediment samples in 2010, with an average concentration of 6.27E-1 pCi/g (dry). The control sample indicated detectable Cs-137 activity with a concentration of 1.30E-1 pCi/g (dry). Cobalt-60 (Co-60) activity was detectable in two of the three indicator samples with an average concentration of 1.27E-1 pCi/g (dry). The Co-60 in the bottom sediment is attributed to plant operation. This concentration is similar to previous years and does not indicate a buildup in the environment. No other gamma activity, except for naturally occurring gamma activity, was detected in the annual bottom sediment samples in 2010.

#### **Aquatic Vegetation**

The aquatic vegetation samples are considered to be sensitive environmental indicators used as long term trending and do not constitute a dose pathway. In 2010, there were three aquatic vegetation indicator samples collected and one aquatic vegetation control sample collected. The aquatic vegetation samples collected pose no dose consequence since this is not a dose pathway to the public. Cobalt (Co)-58 activity was detectable in one of three indicator samples with a single concentration of 5.90E-1 pCi/g (wet) in 2010. Cobalt (Co)-60 activity was detected in 2010 in one out of three indicator samples with a single concentration of 5.40E-2 pCi/g(wet). Cesium (Cs)-137 activity was also detectable in two out of three indicator samples and the control sample with an average indicator value of 1.40E-2 pCi/g (wet) and the control value of 2.50E-2 pCi/g (wet). The Co-58 and Co-60 in the aquatic vegetation are attributed to plant operation. The Cs-137 in both the control and indicator samples appears to be fallout Cs-137 contamination. This concentration is similar to previous years and does not indicate unexpected levels in the environment.

#### Surface Water

Surface waters of Lake Robinson indicated the presence of tritium which is attributed to plant operation. This tritium activity is cyclic and follows the Robinson Plant fuel cycle. Figure 15 displays the tritium activity throughout 2010. These surface waters do not supply drinking water at any downstream location and are not used for irrigation. Therefore, radiological dose via this

pathway is limited to the consumption of fish and evaporation of tritium from Lake Robinson and its subsequent inhalation and ingestion from vegetable gardens and meat producing animals. Using the methodology of Regulatory Guide 1.109, a dose of 0.229 millirem/year to the maximum exposed individual could be assigned to this pathway.

The monthly composite gamma analyses for surface water samples revealed no radionuclides typical of plant effluents. Ten surface water samples were analyzed for I-131 to the required drinking water LLD (<1.0 pCi/L) per the HBRSEP ODCM Revision 30 in 2010 until the HBRSEP ODCM Revision 31 (effective 5/10/10) changed the requirement.

#### External Radiation

Direct radiation exposure in the HBRSEP environs was measured by the placement of thermoluminescent dosimeters (TLDs) around the plant forming an inner ring at approximately 1 mile and an outer ring at approximately 5 miles. The average of inner versus outer ring dose measurements is shown on Figure 16.

#### Asiatic Clams

Benthic samples from Lake Robinson during 2010 continue to confirm the absence of any substantial populations of Asiatic clams (*Corbicula fluminia*). The natural chemistry of the lake (i.e., low alkalinity and hardness) inhibits their proliferation.

## **MISSED SURVEILLANCES**

#### Air Cartridge and Air Particulates

Any REMP weekly air samples (Air Cartridge – AC or Air Particulate – AP (APAC)) that exceed 30 hours of down time in a surveillance period will be reported as a "missed surveillance". However, this sample will still be counted and the data reported; whereas a "missed sample" indicates that no sample was available and no data was reported.

All AP and AC samples were available for counting in 2010.

Missed Samples:

• None for 2010

Missed Surveillances:

- APAC-02, July 19 Total down time was 134.4 hours. The air sampler was found not running and the fuse was replaced (NCR # 410871).
- APAC-05, November 20 The air sampler filter (AP-5) had slipped to one side of the filter holder allowing less than a normal sample volume to be collected on the particulate filter (AP-5). The air particulate sample was still counted (NCR # 436205).

#### **Broadleaf Vegetation**

Broadleaf vegetation (BL) samples were not available during the months of January, February, March, April, November, and December of 2010 due to the seasonal nature of broadleaf vegetation (NCR # 375542, 381472, 388942, 394866, 435071, and 439586).

#### Ground water

First quarter 2010, fifteen ground water (GW) monitoring wells (42, 64, and 69 – 81) were not collected (insufficient volumes for I-131 analyses) and analyzed for I-131 to the drinking water levels (<1 pCi/L), but were analyzed to the non-drinking water levels (<15 pCi/L) (NCR # 539077, 498969, 406845, and 372057).

# GW-74, Well P-08-ASH (2<sup>nd</sup> Quarter 2010)

When collecting the quarterly ground water samples for second quarter 2010, GW-74 was not obtainable because the well was dry (NCR # 400310).

# GW-74, Well P-08-ASH (4<sup>th</sup> Quarter 2010)

When collecting the quarterly ground water samples for fourth quarter 2010, GW-74 was not obtainable because the well was dry (NCR # 435780).

#### **Thermoluminescent Dosimeters (TLDs)**

Three out of the possible 172 TLD samples were missing during 2010.

Second Quarter – TLD # 31 was missing in the field (NCR # 409783).

Fourth Quarter – TLD # 31 had an improper change out of this TLD in the field. The fourth quarter 2010 TLD was left in the field while the first quarter 2011 TLD was returned for analysis (NCR # 445416).

Fourth Quarter – TLD # 39 was missing in the field (NCR # 443122).

Sample	Nuclide	Quarter	Units	HEEC Value	EZA Value	HEEC/EZA Ratio	Evaluation
Gamma Water	1-131	2 <sup>nd</sup>	pCi/L	80.0	78.9	1.01	Agreement
2 <sup>nd</sup> Qtr E7142-668		3 <sup>rd</sup>	pCi/L	66.0	64.4	1.02	Agreement
3 <sup>ra</sup> Qtr E7211-668	Ce-141	2 <sup>nd</sup>	pCi/L	169	161	1.05	Agreement
		3 <sup>rd</sup>	pCi/L	171	165	1.03	Agreement
	Cr-51	2 <sup>nd</sup>	pCi/L	540	494	1.09	Agreement
		3 <sup>rd</sup>	pCi/L	302	297	1.02	Agreement
	Cs-134	2 <sup>nd</sup>	pCi/L	180	183	0.98	Agreement
		3 <sup>rd</sup>	pCi/L	109	118	0.92	Agreement
	Cs-137	2 <sup>nd</sup>	pCi/L	242	218	1.11	Agreement
		3 <sup>rd</sup>	pCi/L	131	120	1.09	Agreement
	Co-58	2 <sup>nd</sup>	pCi/L	160	147	1.09	Agreement
		3 <sup>rd</sup>	pCi/L	95.0	93.5	1.02	Agreement
	Mn-54	2 <sup>nd</sup>	pCi/L	276	246	1.12	Agreement
		3 <sup>rd</sup>	pCi/L	163	152	1.07	Agreement
{	Fe-59	2 <sup>nd</sup>	pCi/L	210	173	1.21	Agreement
		3 <sup>rd</sup>	pCi/L	127	116	1.10	Agreement
	Zn-65	2 <sup>nd</sup>	pCi/L	338	300	1.13	Agreement
		3 <sup>rd</sup>	pCi/L	279	259	1.08	Agreement
	Co-60	2 <sup>nd</sup>	pCi/L	309	286	1.08	Agreement
L		3 <sup>rd</sup>	pCi/L	227	217	1.05	Agreement

Environmental Cross Check Performance Summary for 4Q 2009 and 2010

# Lower Limits of Detection

The samples analyzed met the "a priori" LLD required by the ODCM, except for the first quarter I-131 ground water samples discussed in the Ground Water section starting on page 24 and in the Missed Surveillance section. Typical "a priori" LLD values for the samples analyzed are listed in Table 6.

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