

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Ron Benham  
Manager Nuclear and Regulatory Affairs

April 30, 2019

RA 19-0051

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

Subject: Docket No. 50-482: Wolf Creek Generating Station 2018 Annual Radioactive Effluent Release Report – Report 42

To Whom It May Concern:

The purpose of this letter is to transmit the enclosed Wolf Creek Generating Station (WCGS) Annual Radioactive Effluent Release Report. The report covers the period from January 1, 2018 through December 31, 2018. It is being submitted pursuant to Section 5.6.3 of the WCGS Technical Specifications. The report provides procedures AP 07B-003, Revision 9, "Offsite Dose Calculation Manual," AP 07B-004, Revision 22, "Offsite Dose Calculation Manual (Radiological Environmental Monitoring Program)," and AP 31A-100, Revisions 8 and 9, "Solid Radwaste Process Control Program" that are included as part of the report in accordance with Section 5.5.1 of the WCGS Technical Specifications. These procedures have the changes made during the reporting period marked as required.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4204.

Sincerely,



Ron Benham

RDB/rlt

Enclosure: 2018 Annual Radioactive Effluent Release Report – Report 42

cc: S. A. Morris (NRC), w/e  
B. K. Singal (NRC), w/e  
N. H. Taylor (NRC), w/e  
Senior Resident Inspector (NRC), w/e

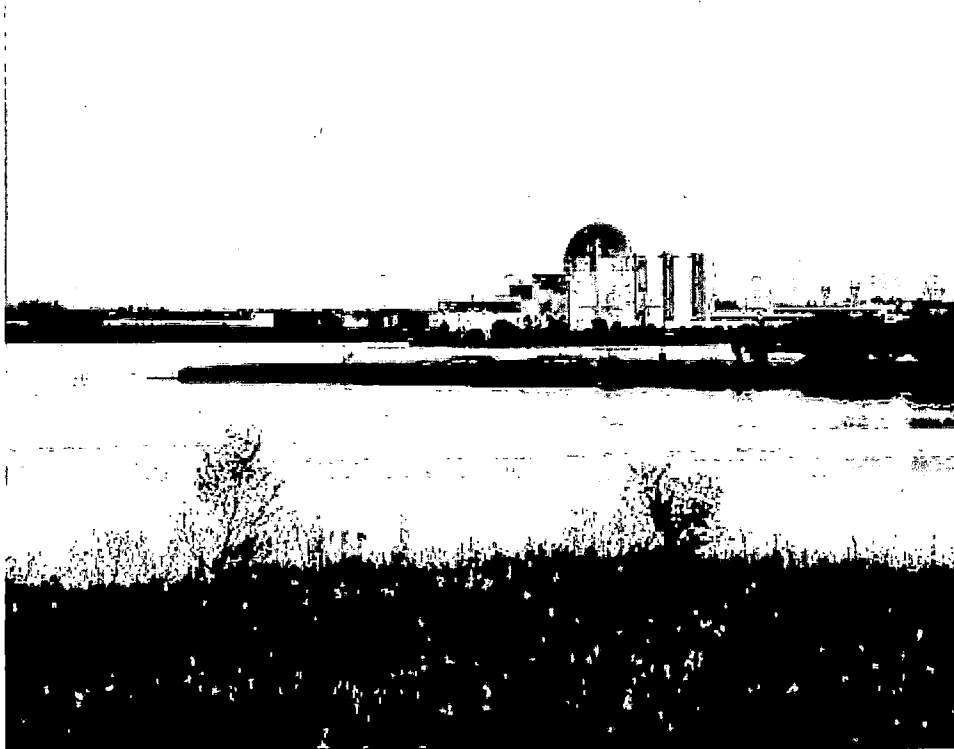
IE48  
ADD9  
NRR

**Wolf Creek Generating Station**

**2018 Annual Radioactive Effluent Release Report – Report 42  
(336 pages including this page)**

**This enclosure contains three enclosures:**

- Enclosure I      *Offsite Dose Calculation Manual, AP 07B-003, Revision 9*
- Enclosure II     *Offsite Dose Calculation Manual (Radiological Environmental Monitoring Program), AP 07B-004, Revision 22*
- Enclosure III    *Solid Radwaste Process Control Program, AP 31A-100, Revision 8 and 9*



# **WOLF CREEK NUCLEAR OPERATING CORPORATION**

## **2018 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT**

---

*Wolf Creek Generating Station*

---

Docket Number 50-482

Renewed Facility Operating License NPF-42

Report Number 42

# **WOLF CREEK NUCLEAR OPERATING CORPORATION**

## **2018 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT**

### **Introduction**

This Annual Radioactive Effluent Release Report (ARERR) covers the operation of Wolf Creek Generating Station (WCGS) from January 1, 2018 through December 31, 2018. The ARERR includes a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit in accordance with Technical Specification 5.6.3. The content of this ARERR is presented in the general format of Revision 1 of Regulatory Guide 1.21.



## **I. SUPPLEMENTAL INFORMATION**

### **A. Regulatory Limits**

The Offsite Dose Calculation Manual (ODCM) describes the methodology and parameters used in the calculation of offsite doses due to radioactive liquid and gaseous effluents. The following are limits required by the ODCM:

#### **1. GASEOUS EFFLUENTS**

The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the site boundary shall be limited to the following:

For noble gases: a dose rate less than or equal to 500 mrem/yr to the whole body and a dose rate less than or equal to 3000 mrem/yr to the skin, and

For Iodine-131, Iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to 1500 mrem/yr to any organ.

The air dose due to noble gases released in gaseous effluents to areas at and beyond the site boundary shall be limited to the following:

During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation, and

During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

The dose to a member of the public from Iodine-131, Iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released to areas at and beyond the site boundary shall be limited to the following:

During any calendar quarter: Less than or equal to 7.5 mrems to any organ, and

During any calendar year: Less than or equal to 15 mrems to any organ.

#### **2. LIQUID EFFLUENTS**

The concentration of radioactive material released in liquid effluents to unrestricted areas shall be limited to 10 times the limit specified in 10 CFR 20, Appendix B, Table 2, Column 2, for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2.00E-04  $\mu\text{Ci/ml}$  total activity.

The dose or dose commitment to a member of the public from radioactive materials in liquid effluents released to unrestricted areas shall be limited:

During any calendar quarter to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ, and

During any calendar year to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

**B. Effluent Concentration Limit (ECL)**

The concentration of radioactive material released in liquid effluents to unrestricted areas shall be limited to 10 times the limit specified in 10 CFR 20, Appendix B, Table 2, Column 2, for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to  $2.00E-04$   $\mu\text{Ci/ml}$  total activity. The percent of ECL values are found in Appendix A, Table 4A.

**C. Average Energy**

Average energy of fission and activation gaseous effluents is not applicable. See ODCM section 3.1 for the methodology used in determining the release rate limits from noble gas releases.

**D. Measurements and Approximations of Total Radioactivity**

Measurements of total radioactivity were performed in accordance with the sampling and analysis requirements of Tables 2-1 and 3-1 of the ODCM (Enclosure I).

Gamma spectroscopy is used as the primary method in determining radionuclide composition and concentration of liquid and gaseous effluents. Liquid composites are sent off site for analysis of Sr-89, Sr-90, Fe-55 and Ni-63. Gaseous composites are also sent off site for Sr-89 and Sr-90 analysis. Liquid scintillation and scintillation alpha counters are used to measure tritium and gross alpha.

**E. Batch Releases**

**1. LIQUID**

Number of batch releases - 53

Total time period for batch release - 6,410 minutes

Maximum time period for a batch release - 270 minutes

Average time period for batch releases - 120.9 minutes

Minimum time period for a batch release - 36 minutes

Average stream flow during periods of release of effluent into a flowing stream-  
Not applicable

**2. GASEOUS**

Number of batch releases - 61

Total time period for batch release – 57,997 minutes

Maximum time period for a batch release – 8,777 minutes

Average time period for batch releases – 950.8 minutes

Minimum time period for a batch release - 17 minutes

**F. Continuous Releases**

**1. GASES**

Continuous gaseous release pathways include the Unit Vent and Radwaste Vent.

**2. LIQUID**

Continuous liquid release pathways include Steam Generator Blowdown, Lime Sludge Pond, Turbine Building Sump and Waste Water Treatment.

**G. Abnormal Releases**

There were no unplanned or uncontrolled releases of radioactive material from the site boundary in 2018.

Update on CR 00084942: On June 14, 2013, approximately 100 gallons of contaminated water leaked from the Spent Fuel Pool into the Component Cooling Water A train (CCW). The primary gamma emitting isotope (Cs-137) was removed from CCW by ion exchange to below detection limits. By the end of 2014, the CCW tritium concentration equalized in both trains to 1.00E-03 uCi/ml and no gamma emitting isotopes were detected. A portion of the CCW system was drained through the normal discharge path during the 2015, 2016 and 2018 refueling outages. After partially draining and refilling the system, tritium values in the CCW are now approximately 7.00E-05 µCi/ml. The CCW system is scheduled to be partially released and monitored through defined ODCM discharge paths during the 2019 refueling outage for system maintenance. The following CRs document the event and evaluation: 70420, 70451, 70546 and 72212.

**II. GASEOUS EFFLUENTS**

An elevated release pathway does not exist at WCGS. All airborne releases are considered to be ground level releases. Appendix A, Table 1A contains the summation of all gaseous effluent discharges, while Table 1B shows the quarterly sums of curies discharged and is divided according to batch or continuous mode.

### **III. LIQUID EFFLUENTS**

Summary information can be found in Appendix A, Tables 2A and 2B. Table 2A contains the summation of all liquid effluent discharges, while Table 2B reports the quarterly sums of total curies released and is divided according to batch or continuous mode.

### **IV. SOLID WASTE**

Appendix A, Table 3 contains information on shipments of solid waste and irradiated fuel transported from the site during the period.

### **V. RADIOLOGICAL IMPACT ON MAN**

No ODCM dose limits were exceeded in 2018.

Dose calculations are performed for the limiting age group i.e., adult age group for the liquid pathway and the child age group for gaseous effluent organ doses. All calculations were performed in accordance with the methodology and parameters in the ODCM. A conservative error of thirty percent has been estimated in the effluent data for liquid and gaseous dose.

#### **A. Dose Due to Liquid Effluents**

The dose due to liquid effluents was calculated in accordance with the methodology and parameters in the ODCM and can be found in Appendix A, Tables 4B and 4C. Table 4C is included to show the correlation between curies released and the associated calculated maximum organ dose.

Wolf Creek ODCM methodology is used to calculate the maximum organ dose which assumes that an individual drinks the water and eats the fish from the discharge point. ODCM section 2.2 organ dose limits are used.

#### **B. Dose Due to Gaseous Effluents**

The dose due to gaseous effluents can be found in Appendix A, Tables 4D and 4E and is calculated in accordance with the methodology and parameters in the ODCM. Table 4E is included to show the correlation between curies released and the associated calculated maximum organ dose. The gaseous pathway dose determination is met by the ODCM methodology of assigning all gaseous pathways to a hypothetical individual residing at the highest annual X/Q and D/Q location, which assumes that an individual actually resides at the site boundary. This results in a conservative estimate of dose to a member of the public, rather than determining each pathway dose for each release condition. ODCM section 3.2.2 organ dose limits are used.

### C. Dose to a Member of the Public from Activities Inside the Site Boundary

Four activities by members of the public were considered in this evaluation. The dose calculated for the maximum exposed individual is as follows:

	Total Dose
Personnel making deliveries to the plant	2.72E-01 mrem/yr
Workers at the William Allen White Building located outside the protected area boundary	6.10E-03 mrem/yr
Use of the access road south of the Radwaste Building	2.79E-03 mrem/yr
Public use of the cooling lake during times when fishing was allowed	3.74E-02 mrem/yr

The plant delivery calculations were based on deliveries being made 3 hours per week for 50 weeks per year. The William Allen White Building occupancy was based on normal working hours of 2,000 per year. The usage factor for the access road south of the Radwaste Building was 25 hours per year. The dose to anglers on the lake was based upon 3,600 hours (12 hours a day for 300 days, based on the number of days that the lake was open to anglers). The Submersion, Inhalation and Ground Plane pathway doses were added to derive the total dose. All calculations were performed in accordance with the methodology and parameters in the ODCM.

### VI. METEOROLOGICAL DATA

Appendix B documents WCGS meteorological data for wind speed, wind direction and atmospheric stability. The meteorological data supplied in the tables covers the period from January 1, 2018 through December 31, 2018, and indicates the number of hours at each wind speed and direction for each stability class. All gaseous releases at the WCGS are ground level releases.

WCGS did not meet Regulatory Guide 1.23 requirement for data recovery, for all instruments. The 60 Meter Wind Direction, due to instrument problems and weather concerns in the fourth quarter, had an 89.89% data recovery. Condition Report 131756 was written on the issue and work orders have since been completed fixing the issues. The 60 Meter Temperature instrument had an 88.97% data recovery for 2018, due to issues in the third quarter which calibration performance resolved. The remaining instruments, both at 10 and 60 meters, met or exceeded a 90% meteorological data recovery for 2018.

## **VII. ADDITIONAL INFORMATION**

### **A. Unplanned Releases**

There were no unplanned releases in 2018.

### **B. ODCM**

The ODCM is in the form of two separate procedures. They are AP 07B-003 (Offsite Dose Calculation Manual) and AP 07B-004 (Offsite Dose Calculation Manual-Radiological Environmental Monitoring Program). Both procedures are attached as enclosures.

AP 07B-003 (Offsite Dose Calculation Manual) was revised during the reporting period. A complete copy of revision 9 with revision bars showing the areas of change is attached.

### **C. Radwaste Treatment System Changes**

There were no major changes made to the Liquid, Solid or Gaseous Radwaste Systems in 2018 that alter the capacity or handling of radioactive wastes or differ in the method of treatment.

### **D. Annual Land Use Census Changes**

Per the Annual Land Use Census, three changes were identified for the nearest occupied residence in each sector. Six changes were noted for the nearest garden producing broadleaf vegetation. There were no changes regarding milk sample locations. No locations were identified that milked animals for human consumption.

### **E. Liquid Holdup or Gas Storage Tanks**

No limits were exceeded in 2018 for Technical Requirement 3.10.1 (Liquid Holdup Tanks) or Technical Surveillance Requirement 3.10.3.1 (Gas Storage Tanks).

### **F. Functionality of Effluent Monitoring Instrumentation**

Effluent monitoring instrumentation returned to functional status within specified time.

### **G. Missed samples**

There were no missed samples during the reporting period.

### **H. NEI Groundwater Protection Industry Initiative**

See Appendix C.

## **I. Other**

### **PERMIT U1GB2019-034**

On 02/06/2018, GERE92 (Condenser Air Removal System Radiation Detector) was removed from service to support a planned Unit Vent Outage lasting approximately three days. During this time we were discharging directly to the turbine building and routing aux building air to radwaste to discharge through the radwaste vent monitors. The air routed to radwaste was considered a monitored release while the air directed to the turbine building was considered unmonitored. With GERE92 being nonfunctional, compensatory samples were pulled. At the time, we were seeing XE-133 and occasionally XE-135 in our condenser off gas samples due to failed fuel. A preliminary permit was generated using the maximum isotope activities during the time period to evaluate dose and later an actual miscellaneous permit was generated. The total curies and dose were well below ODCM limits. No required samples were missed.

### **CR 00127292**

During the review of monthly and quarterly composite paperwork, it was found that an incorrect volume was used on the September monthly batch composite which led to an incorrect volume also being used on the 3<sup>rd</sup> quarter batch composite which was mailed offsite for analysis. There was enough weekly and monthly composite remaining to make a new monthly and quarterly batch composite which was shipped for analysis. No composites were missed or excluded, resulting in no missed ODCM surveillances.

### **CR 00127659**

An error was identified on gas release permit U1GB2018-136 for containment purge. The release occurred on October 10, 2018 at 0756 using an incorrect, non-conservative Expected Monitor Response (EMR) value. The error was caused by using the incorrect radiation monitor background reading. The background was reading 3.39E-06  $\mu\text{Ci/ml}$ , but the technician entered 3.39E-07  $\mu\text{Ci/ml}$ . This reading is used to calculate the EMR which is compared to the monitor low setpoint. An EMR of 1.25E-06  $\mu\text{Ci/ml}$  was used on the permit, but should have been 4.31E-06  $\mu\text{Ci/ml}$ . The setpoints used on the permit were calculated correctly and not exceeded.

### **CR 00120547**

Verifications and approvals were not obtained for release permit U1LC2018-003 prior to initiating a Turbine Building Sump release on 03/19/18 at 1506. These verifications include entering the setpoints, verifying the setpoints and authorization of the release by the shift manager. When this was discovered on 03/21/18, the setpoints were verified and the release was authorized by the shift manager. The setpoints were at the required value when it was checked. Chemistry sampled as required per the ODCM-no samples were missed. Procedure Change Requests were made to applicable procedures to address better documentation and include them in the prerequisite sections.

**CR 00128946**

On 12/25/2018, operations commenced hanging C22 D-KC-N-26 for radwaste fire protection work to start on 12/26/2018. Around 1700, the control room received a call that water was seen crossing the RCA boundary by security camera. The flushing of isolation valves had been conducted earlier which allowed tritiated water to come in contact with the soil rather than flow directly into a storm drain due to spillover from the drain and the ground being sloped. The fire protection water had been sampled prior to work with the following results: pH of 8.9, gross activity was 0.00E+00  $\mu\text{Ci/ml}$  and a tritium value of 1.442E-05  $\mu\text{Ci/ml}$  which is roughly equivalent to our lake tritium.

**CARBON-14 (CR 36059)**

Regulation 10CFR50.36a requires nuclear power plants to report quantities of principal radionuclides in the annual radioactive effluent release report. In the early 1980s, the NRC decided that C-14 radionuclide would not be required to be reported because it would not make a significant contribution to dose. Since this time, technology has advanced both for effluent isotopic reduction and isotope detection and estimation. It is more likely the C-14 meets the definition of a principal radionuclide in accordance with the newly published Regulatory Guide 1.21 Revision 2 (June 2009).

The NRC allows the reporting of this isotope based on estimation methods. EPRI TR 1021106 developed an estimation method based on peer-reviewed research that incorporates parameters of Wolf Creek's reactor design to estimate the gross amount of C-14 produced annually. This value is fed into additional calculations, based on 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, to provide an estimation of annual dose. Based on the 2010 theoretical calculations and assuming the maximum percentage of inorganic C-14 compounds (30%), Wolf Creek has estimated the annual release of C-14 to be 10.7 curies. This will give maximum dose values of 4.60 mrem/yr child bone dose and 0.921 mrem/yr child total body dose. This is well below the 10CFR50, Appendix I, ALARA design objective of 15 mrem/yr. Additionally, this value is on par with the dose expected from naturally occurring radiocarbon.



**Appendix A**  
**(Effluent Tables)**

**TABLE 1A:  
GASEOUS EFFLUENTS-SUMMATION OF ALL RELEASES**

Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Est. Total Error, %
------	-----------	-----------	-----------	-----------	---------------------

**Fission & Activation Gases**

<i>Total Release</i>	Ci	3.48E+00	1.99E+01	2.45E+00	6.87E-02	3.00E+01
<i>Average Release Rate for period</i>	μCi/sec	4.48E-01	2.53E+00	3.09E-01	8.64E-03	
<i>Percent of ODCM limit</i>	%	3.34E-03	1.48E-02	3.39E-03	8.91E-04	

**Iodines**

<i>Total Iodine-131</i>	Ci	3.73E-07	8.53E-05	0.00E+00	0.00E+00	3.00E+01
<i>Average Release Rate for period</i>	μCi/sec	4.79E-08	1.08E-05	0.00E+00	0.00E+00	
<i>Percent of ODCM limit</i>	%	3.73E-05	8.53E-03	0.00E+00	0.00E+00	

**Particulates**

<i>Particulates with half-lives &gt;8 days</i>	Ci	0.00E+00	5.72E-06	0.00E+00	0.00E+00	3.00E+01
<i>Average Release Rate for period</i>	μCi/sec	0.00E+00	7.28E-07	0.00E+00	0.00E+00	
<i>Percent of ODCM limit</i>	%	0.00E+00	4.06E-05	0.00E+00	0.00E+00	
<i>Gross alpha radioactivity</i>	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.00E+01

**Tritium**

<i>Total release</i>	Ci	4.61E+00	1.56E+01	5.91E+00	9.53E+00	3.00E+01
<i>Average Release Rate for period</i>	μCi/sec	5.93E-01	1.98E+00	7.43E-01	1.20E+00	
<i>Percent of ODCM limit</i>	%	4.35E-02	1.47E-01	5.57E-02	8.98E-02	

**TABLE 1B:  
GASEOUS EFFLUENTS-GROUND LEVEL RELEASES-BATCH MODE**

Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4
-------------------	------	-----------	-----------	-----------	-----------

**Fission gases**

Argon-41	Ci	1.34E-01	2.84E-02	5.58E-02	6.87E-02
Xenon-133	Ci	1.93E-01	1.66E+01	1.28E-04	<2.67E-03
Krypton-85	Ci	1.06E-01	2.13E-01	2.40E+00	0.00E+00
Krypton-87	Ci	<4.62E-03	<8.89E-01	<2.49E-03	<2.87E-03
Krypton-88	Ci	<5.81E-03	<1.12E+00	<3.13E-03	<3.61E-03
Xenon-133m	Ci	6.15E-05	<2.34E+00	<6.57E-03	<7.56E-03
Xenon-135	Ci	1.16E-05	1.88E-04	<7.53E-04	<8.67E-04
Xenon-138	Ci	<1.41E-01	<2.71E+01	<7.59E-02	<8.73E-02
Xenon-131m	Ci	2.51E-03	2.81E-04	0.00E+00	0.00E+00
Total for period*	Ci	4.35E-01	1.68E+01	2.45E+00	6.87E-02

**Iodines**

Iodine-131	Ci	<1.22E-07	<2.34E-05	<6.57E-08	<7.56E-08
Iodine-133	Ci	<1.22E-05	<2.34E-03	<6.57E-06	<7.56E-06
Total for period*	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

**Particulates**

Strontium-89	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Strontium-90	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Cesium-134	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Cesium-137	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Manganese-54	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Iron-59	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Cobalt-58	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Cobalt-60	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Zinc-65	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Molybdenum-99	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Cerium-141	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Cerium-144	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07
Total for period*	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<b>Tritium</b>	Ci	7.77E-02	3.56E+00	4.47E-01	4.35E-01
<b>Gross Alpha</b>	Ci	<1.22E-06	<2.34E-04	<6.57E-07	<7.56E-07

\*Less than values are not included in the summation for the total release values.

**TABLE 1B:  
GASEOUS EFFLUENTS-GROUND LEVEL RELEASES -CONTINUOUS MODE**

Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4
-------------------	------	-----------	-----------	-----------	-----------

**Fission gases**

Xenon-133	Ci	3.05E+00	3.12E+00	<8.84E+00	<8.50E+00
Krypton-87	Ci	<9.04E+00	<8.79E+00	<9.50E+00	<9.14E+00
Krypton-88	Ci	<1.14E+01	<1.10E+01	<1.19E+01	<1.15E+01
Xenon-133m	Ci	<2.38E+01	<2.31E+01	<2.50E+01	<2.41E+01
Xenon-135	Ci	<2.73E+00	<2.66E+00	<2.87E+00	<2.76E+00
Xenon-138	Ci	<2.75E+02	<2.68E+02	<2.89E+02	<2.78E+02
Total for period	Ci	3.05E+00	3.12E+00	0.00E+00	0.00E+00

**Iodines**

Iodine-131	Ci	3.73E-07	8.53E-05	<2.50E-04	<2.41E-04
Iodine-133	Ci	<2.38E-02	<2.31E-02	<2.50E-02	<2.41E-02
Total for period	Ci	3.73E-07	8.53E-05	0.00E+00	0.00E+00

**Particulates**

Strontium-89	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Strontium-90	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Cesium-134	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Cesium-137	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Manganese-54	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Iron-59	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Cobalt-58	Ci	<2.38E-03	5.72E-06	<2.50E-03	<2.41E-03
Cobalt-60	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Zinc-65	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Molybdenum-99	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Cerium-141	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Cerium-144	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
Total for period	Ci	0.00E+00	5.72E-06	0.00E+00	0.00E+00

<b>Tritium</b>	Ci	4.53E+00	1.20E+01	5.46E+00	9.09E+00
----------------	----	----------	----------	----------	----------

<b>Gross Alpha</b>	Ci	<2.38E-03	<2.31E-03	<2.50E-03	<2.41E-03
--------------------	----	-----------	-----------	-----------	-----------

\*Less than values are not included in the summation for the total release values.

**TABLE 2A:  
LIQUID EFFLUENTS – SUMMATION OF ALL RELEASES**

Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Est. Total Error, %
------	-----------	-----------	-----------	-----------	---------------------

**FISSION AND ACTIVATION PRODUCTS**

Total Release (not including tritium, gases, alpha)	Ci	3.03E-03	1.15E-03	1.57E-03	3.85E-04	3.00E+01
Average Diluted Concentration during period	µCi/ml	1.18E-11	8.04E-12	5.70E-12	1.43E-12	
Percent of Applicable Limit	%	6.06E-02	2.30E-02	3.14E-02	7.69E-03	

**TRITIUM**

Total Release	Ci	6.19E+02	2.31E+02	2.76E+01	1.38E+02	3.00E+01
Average Diluted Concentration during period	µCi/ml	2.41E-06	1.61E-06	9.99E-08	5.15E-07	
Percent of Applicable Limit	%	2.41E-01	1.61E-01	9.99E-03	5.15E-02	

**DISSOLVED AND ENTRAINED GASES**

Total Release	Ci	4.60E-01	4.00E-01	0.00E+00	0.00E+00	3.00E+01
Average Diluted Concentration during period	µCi/ml	1.79E-09	2.79E-09	0.00E+00	0.00E+00	
Percent of Applicable Limit	%	8.96E-04	1.40E-03	0.00E+00	0.00E+00	

**GROSS ALPHA RADIOACTIVITY**

Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.00E+01
---------------	----	----------	----------	----------	----------	----------

Volume of waste released (prior to dilution)	L	9.96E+07	7.07E+07	1.09E+08	1.05E+08	3.00E+01
Volume of dilution water used during period	L	2.57E+11	1.43E+11	2.76E+11	2.68E+11	3.00E+01

**TABLE 2B: LIQUID EFFLUENTS – BATCH MODE**

Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4
<b>Fission &amp; Activation Products</b>					
Strontium-89	Ci	<4.19E-05	<5.35E-05	<1.38E-05	<1.58E-05
Strontium-90	Ci	<4.19E-05	<5.35E-05	<1.38E-05	<1.58E-05
Cesium-134	Ci	<4.19E-04	6.52E-07	<1.38E-04	<1.58E-04
Cesium-137	Ci	<4.19E-04	1.03E-06	<1.38E-04	1.81E-05
Cobalt-58	Ci	6.78E-05	4.30E-04	3.25E-04	2.02E-05
Cobalt-60	Ci	2.67E-05	2.49E-05	1.97E-05	<1.58E-04
Iron-55	Ci	<8.37E-04	<1.07E-03	<2.75E-04	<3.15E-04
Iron-59	Ci	<4.19E-04	<5.35E-04	<1.38E-04	<1.58E-04
Zinc-65	Ci	<4.19E-04	<5.35E-04	<1.38E-04	<1.58E-04
Manganese-54	Ci	<4.19E-04	<5.35E-04	<1.38E-04	<1.58E-04
Nickel-63	Ci	1.34E-03	1.72E-04	1.40E-04	2.96E-05
Antimony-125	Ci	1.58E-03	3.52E-04	1.09E-03	3.17E-04
Molybdenum-99	Ci	<4.19E-04	<5.35E-04	<1.38E-04	<1.58E-04
Cerium-141	Ci	<4.19E-04	<5.35E-04	<1.38E-04	<1.58E-04
Cerium-144	Ci	<4.19E-04	<5.35E-04	<1.38E-04	<1.58E-04
Iodine-131	Ci	1.29E-05	1.11E-04	<2.75E-04	<3.15E-04
Iodine-133	Ci	0.00E+00	1.00E-05	0.00E+00	0.00E+00
Total for period*	Ci	3.03E-03	1.10E-03	1.57E-03	3.85E-04
<b>Dissolved &amp; Entrained Gases</b>					
Xenon-133	Ci	4.35E-01	3.78E-01	<2.75E-03	<3.15E-03
Xenon-133m	Ci	2.22E-03	5.31E-03	<2.75E-03	<3.15E-03
Xenon-135	Ci	4.28E-05	1.14E-03	<2.75E-03	<3.15E-03
Xenon-131m	Ci	1.11E-02	7.05E-03	<2.75E-03	<3.15E-03
Krypton-85	Ci	1.21E-02	8.97E-03	<2.75E-03	<3.15E-03
Total for period*	Ci	4.60E-01	4.00E-01	0.00E+00	0.00E+00
<b>Tritium</b>	Ci	6.17E+02	2.29E+02	2.58E+01	1.37E+02
<b>Gross Alpha</b>	Ci	<8.37E-05	<1.07E-04	<2.75E-05	<3.15E-05

\*Less than values are not included in the summation for the total release values.

**TABLE 2B: LIQUID EFFLUENTS – CONTINUOUS MODE**

Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4
<b>Fission &amp; Activation Products</b>					
Strontium-89	Ci	<4.94E-03	<3.48E-03	<5.40E-03	<5.25E-03
Strontium-90	Ci	<4.94E-03	<3.48E-03	<5.40E-03	<5.25E-03
Cesium-134	Ci	<4.94E-02	2.59E-05	<5.40E-02	<5.25E-02
Cesium-136	Ci	0.00E+00	3.33E-06	0.00E+00	0.00E+00
Cesium-137	Ci	<4.94E-02	9.88E-06	<5.40E-02	<5.25E-02
Cobalt-58	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Cobalt-60	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Iron-55	Ci	<9.88E-02	<6.96E-02	<1.08E-01	<1.05E-01
Iron-59	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Zinc-65	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Manganese-54	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Nickel-63	Ci	<9.88E-02	<6.96E-02	<1.08E-01	<1.05E-01
Molybdenum-99	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Cerium-141	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Cerium-144	Ci	<4.94E-02	<3.48E-02	<5.40E-02	<5.25E-02
Iodine-131	Ci	<9.88E-02	1.20E-05	<1.08E-01	<1.05E-01
Total for period*	Ci	0.00E+00	5.11E-05	0.00E+00	0.00E+00
<b>Dissolved &amp; Entrained Gases</b>					
Xenon-133	Ci	<9.88E-01	2.78E-05	<1.08E+00	<1.05E+00
Total for period*	Ci	0.00E+00	2.78E-05	0.00E+00	0.00E+00
<b>Tritium</b>	Ci	2.17E+00	1.45E+00	1.77E+00	1.91E+00
<b>Gross Alpha</b>	Ci	<9.88E-03	<6.96E-03	<1.08E-02	<1.05E-02

\*Less than values are not included in the summation for the total release values.

**TABLE 3:  
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS**

**A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (NOT IRRADIATED FUEL)**

1. Type of Waste	Units	1-Year Period	Est. Total Error (%)
a. Spent resins, filter sludges, evaporator bottoms, etc.	m <sup>3*</sup>	3.06E+01	
	Ci	2.37E+02	2.50E+01
b. Dry compressible waste, contaminated equip., etc.	m <sup>3*</sup>	3.33E+02	
	Ci	1.29E-01	2.50E+01
c. Irradiated components, control rods, etc.	m <sup>3*</sup>	0.0	
	Ci	0.0	
d. Other	m <sup>3*</sup>	5.66E+00	
	Ci	1.74E-05	2.50E+01

\*This is the volume sent offsite for volume reduction prior to disposal (waste volume).

**2. Estimate of Major Nuclide Composition (by Type of Waste)  
[Nuclides listed with % abundance greater than 10%]**

a. Spent resins, filter sludges, evaporator bottoms, etc.

<u>Nuclide</u>	<u>% Abundance</u>	<u>Curies</u>
Ni-63	83.02	1.97E+02

b. Dry compressible waste, contaminated equipment, etc.

<u>Nuclide</u>	<u>% Abundance</u>	<u>Curies</u>
Co-58	51.01	6.56E-02
Co-60	24.66	3.17E-02

c. Irradiated components, control rods, etc. – None

d. Other – Oil

<u>Nuclide</u>	<u>% Abundance</u>	<u>Curies</u>
Fe-55	11.81	2.05E-06
Co-60	58.78	1.02E-05
Ni-63	15.37	2.67E-06



### 3. Solid Waste Disposition

<u>Number of Shipments</u>	<u>Mode of Transportation</u>	<u>Destination</u>
10	Truck (Hittman Transport Services)	Energy Solutions Oak Ridge, TN (Bear Creek)
1	Truck (Hittman Transport Services)	Energy Solutions Erwin, TN (Resin Solutions)
1	Truck (Visionary Solutions, LLC)	Alaron Corporation Wampum, PA

### 4. Class of Solid Waste

- a. Class A, Class B, Class C – corresponding to 2a
- b. Class A –Corresponding to 2b
- c. Not applicable
- d. Class A –Corresponding to 2d

### 5. Type of Container

- a. LSA (General Design), Type A - corresponding to 2a
- b. LSA (General Design) - corresponding to 2b
- c. Not applicable
- d. LSA (General Design) - corresponding to 2d

### 6. Solidification Agent

- a. Not applicable
- b. Not applicable
- c. Not applicable
- d. Not applicable

### B. IRRADIATED FUEL SHIPMENTS (DISPOSITION)

No irradiated fuel shipments occurred during the 2018 period.

**TABLE 4A: 2018 EFFLUENT CONCENTRATION LIMITS**

<i>Nuclides</i>	<i>Curies</i>	<i>Average Diluted Concentration (<math>\mu\text{Ci/ml}</math>)</i>	<i>10 CFR 20 ECL (<math>\mu\text{Ci/ml}</math>)</i>	<i>% ECL</i>
<b><i>Tritium</i></b>	1.02E+03	1.08E-06	1.00E-03	1.08E-01
<b><i>Cobalt-58</i></b>	8.44E-04	8.93E-13	2.00E-05	4.46E-06
<b><i>Cobalt-60</i></b>	7.12E-05	7.55E-14	3.00E-06	2.52E-06
<b><i>Nickel-63</i></b>	1.68E-03	1.78E-12	1.00E-04	1.78E-06
<b><i>Antimony-125</i></b>	3.34E-03	3.54E-12	3.00E-05	1.18E-05
<b><i>Iodine-131</i></b>	1.36E-04	1.44E-13	1.00E-06	1.44E-05
<b><i>Iodine-133</i></b>	1.00E-05	1.06E-14	7.00E-06	1.51E-07
<b><i>Cesium-134</i></b>	2.65E-05	2.81E-14	9.00E-07	3.12E-06
<b><i>Cesium-136</i></b>	3.33E-06	3.53E-15	6.00E-06	5.88E-08
<b><i>Cesium-137</i></b>	2.90E-05	3.07E-14	1.00E-06	3.07E-06
<b><i>Xenon-133m</i></b>	7.52E-03	7.97E-12	2.00E-04	3.99E-06
<b><i>Xenon-133</i></b>	8.12E-01	8.61E-10	2.00E-04	4.30E-04
<b><i>Xenon-135</i></b>	1.19E-03	1.25E-12	2.00E-04	6.26E-07
<b><i>Krypton-85</i></b>	2.11E-02	2.23E-11	2.00E-04	1.12E-05
<b><i>Xenon-131m</i></b>	1.81E-02	1.92E-11	2.00E-04	9.61E-06

**TABLE 4B: 2018 LIQUID CUMULATIVE DOSE SUMMARY**

<b>QUARTER 1 OF 2018 (MREM)</b>	<b>ODCM Calculated Dose</b>	<b>ODCM Limit (mrem)</b>	<b>% of Limit</b>
Total Dose for Bone	5.28E-04	5.00E+00	1.06E-02
Total Dose for Liver	7.35E-02	5.00E+00	1.47E+00
Total Dose for Total Body	7.35E-02	1.50E+00	4.90E+00
Total Dose for Thyroid	7.35E-02	5.00E+00	1.47E+00
Total Dose for Kidney	7.35E-02	5.00E+00	1.47E+00
Total Dose for Lung	7.35E-02	5.00E+00	1.47E+00
Total Dose for GI-LLI	7.35E-02	5.00E+00	1.47E+00
<b>QUARTER 2 OF 2018 (MREM)</b>			
Total Dose for Bone	3.92E-03	5.00E+00	7.84E-02
Total Dose for Liver	1.14E-01	5.00E+00	2.28E+00
Total Dose for Total Body	1.12E-01	1.50E+00	7.47E+00
Total Dose for Thyroid	1.09E-01	5.00E+00	2.18E+00
Total Dose for Kidney	1.09E-01	5.00E+00	2.18E+00
Total Dose for Lung	1.07E-01	5.00E+00	2.14E+00
Total Dose for GI-LLI	1.06E-01	5.00E+00	2.12E+00
<b>QUARTER 3 OF 2018 (MREM)</b>			
Total Dose for Bone	4.92E-05	5.00E+00	9.84E-04
Total Dose for Liver	1.98E-02	5.00E+00	3.96E-01
Total Dose for Total Body	1.98E-02	1.50E+00	1.32E+00
Total Dose for Thyroid	1.98E-02	5.00E+00	3.96E-01
Total Dose for Kidney	1.98E-02	5.00E+00	3.96E-01
Total Dose for Lung	1.98E-02	5.00E+00	3.96E-01
Total Dose for GI-LLI	1.99E-02	5.00E+00	3.98E-01
<b>QUARTER 4 OF 2018 (MREM)</b>			
Total Dose for Bone	6.99E-05	5.00E+00	1.40E-03
Total Dose for Liver	3.76E-02	5.00E+00	7.52E-01
Total Dose for Total Body	3.76E-02	1.50E+00	2.51E+00
Total Dose for Thyroid	3.75E-02	5.00E+00	7.50E-01
Total Dose for Kidney	3.75E-02	5.00E+00	7.50E-01
Total Dose for Lung	3.75E-02	5.00E+00	7.50E-01
Total Dose for GI-LLI	3.75E-02	5.00E+00	7.50E-01
<b>TOTALS FOR 2018 (MREM)</b>			
Total Dose for Bone	4.57E-03	1.00E+01	4.57E-02
Total Dose for Liver	2.45E-01	1.00E+01	2.45E+00
Total Dose for Total Body	2.43E-01	3.00E+00	8.10E+00
Total Dose for Thyroid	2.40E-01	1.00E+01	2.40E+00
Total Dose for Kidney	2.40E-01	1.00E+01	2.40E+00
Total Dose for Lung	2.38E-01	1.00E+01	2.38E+00
Total Dose for GI-LLI	2.37E-01	1.00E+01	2.37E+00

**TABLE 4C:  
LIQUID CUMULATIVE DOSE SUMMARY**

Quarter 1    Quarter 2    Quarter 3    Quarter 4    Total

**Fission & Activation Products\***

Total Release (Ci)	3.03E-03	1.15E-03	1.57E-03	3.85E-04	6.14E-03
Maximum Organ Dose (mrem)	5.28E-04	7.46E-03	4.92E-05	8.17E-05	7.58E-03
Organ Dose Limit (mrem)	5.00E+00	5.00E+00	5.00E+00	5.00E+00	1.00E+01
Percent of Limit	1.06E-02	1.49E-01	9.83E-04	1.63E-03	7.58E-02

**Tritium**

Total Release (Ci)	6.19E+02	2.31E+02	2.76E+01	1.38E+02	1.02E+03
Maximum Organ Dose (mrem)	7.35E-02	1.06E-01	1.98E-02	3.75E-02	2.37E-01
Organ Dose Limit (mrem)	5.00E+00	5.00E+00	5.00E+00	5.00E+00	1.00E+01
Percent of Limit	1.47E+00	2.13E+00	3.97E-01	7.50E-01	2.37E+00

**Dissolved & Entrained Gases**

Total Release (Ci)	4.60E-01	4.00E-01	0.00E+00	0.00E+00	8.60E-01
--------------------	----------	----------	----------	----------	----------

**Gross Alpha Radioactivity**

Total Release (Ci)	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
--------------------	----------	----------	----------	----------	----------

\*Does not include H-3, gases or alpha

**TABLE 4D: 2018 GASEOUS CUMULATIVE DOSE SUMMARY**

<b>QUARTER 1 OF 2018 (MREM)</b>	<b>ODCM Calculated Dose</b>	<b>ODCM Limit (mrem)</b>	<b>% of Limit</b>
Total Dose for Bone	6.49E-07	7.50E+00	8.65E-06
Total Dose for Liver	3.26E-03	7.50E+00	4.35E-02
Total Dose for Total Body	3.26E-03	7.50E+00	4.35E-02
Total Dose for Thyroid	3.48E-03	7.50E+00	4.64E-02
Total Dose for Kidney	3.26E-03	7.50E+00	4.35E-02
Total Dose for Lung	3.26E-03	7.50E+00	4.35E-02
Total Dose for GI-LLI	3.26E-03	7.50E+00	4.35E-02
<b>QUARTER 2 OF 2018 (MREM)</b>			
Total Dose for Bone	1.50E-04	7.50E+00	2.00E-03
Total Dose for Liver	1.12E-02	7.50E+00	1.49E-01
Total Dose for Total Body	1.11E-02	7.50E+00	1.48E-01
Total Dose for Thyroid	6.01E-02	7.50E+00	8.01E-01
Total Dose for Kidney	1.13E-02	7.50E+00	1.51E-01
Total Dose for Lung	1.10E-02	7.50E+00	1.47E-01
Total Dose for GI-LLI	1.10E-02	7.50E+00	1.47E-01
<b>QUARTER 3 OF 2018 (MREM)</b>			
Total Dose for Bone	0.00E+00	7.50E+00	0.00E+00
Total Dose for Liver	4.18E-03	7.50E+00	5.57E-02
Total Dose for Total Body	4.18E-03	7.50E+00	5.57E-02
Total Dose for Thyroid	4.18E-03	7.50E+00	5.57E-02
Total Dose for Kidney	4.18E-03	7.50E+00	5.57E-02
Total Dose for Lung	4.18E-03	7.50E+00	5.57E-02
Total Dose for GI-LLI	4.18E-03	7.50E+00	5.57E-02
<b>QUARTER 4 OF 2018 (MREM)</b>			
Total Dose for Bone	0.00E+00	7.50E+00	0.00E+00
Total Dose for Liver	6.74E-03	7.50E+00	8.99E-02
Total Dose for Total Body	6.74E-03	7.50E+00	8.99E-02
Total Dose for Thyroid	6.74E-03	7.50E+00	8.99E-02
Total Dose for Kidney	6.74E-03	7.50E+00	8.99E-02
Total Dose for Lung	6.74E-03	7.50E+00	8.99E-02
Total Dose for GI-LLI	6.74E-03	7.50E+00	8.99E-02
<b>TOTALS FOR 2018 (MREM)</b>			
Total Dose for Bone	1.50E-04	1.50E+01	1.00E-03
Total Dose for Liver	2.54E-02	1.50E+01	1.69E-01
Total Dose for Total Body	2.53E-02	1.50E+01	1.69E-01
Total Dose for Thyroid	7.45E-02	1.50E+01	4.97E-01
Total Dose for Kidney	2.55E-02	1.50E+01	1.70E-01
Total Dose for Lung	2.52E-02	1.50E+01	1.68E-01
Total Dose for GI-LLI	2.52E-02	1.50E+01	1.68E-01

TABLE 4E: 2018 GASEOUS CUMULATIVE DOSE SUMMARY

	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
<b><i>Fission &amp; Activation Gases</i></b>					
Total Release (Ci)	3.48E+00	1.99E+01	2.45E+00	6.87E-02	2.59E+01
Total Gamma Air Dose (mrad)	1.67E-04	5.03E-04	3.91E-05	4.45E-05	7.54E-04
Gamma Air Dose Limit (mrad)	5.00E+00	5.00E+00	5.00E+00	5.00E+00	1.00E+01
Percent of Gamma Air Dose Limit	3.34E-03	1.01E-02	7.81E-04	8.91E-04	7.54E-03
Total Beta Air Dose (mrad)	2.82E-04	1.48E-03	3.39E-04	1.57E-05	2.11E-03
Beta Air Dose Limit (mrad)	1.00E+01	1.00E+01	1.00E+01	1.00E+01	2.00E+01
Percent of Beta Air Dose Limit	2.82E-03	1.48E-02	3.39E-03	1.57E-04	1.06E-02
<b><i>Particulates</i></b>					
Total Particulates (Ci)	0.00E+00	5.72E-06	0.00E+00	0.00E+00	5.72E-06
Maximum Organ Dose (mrem)	0.00E+00	3.05E-06	0.00E+00	0.00E+00	3.05E-06
Organ Dose Limit (mrem)	7.50E+00	7.50E+00	7.50E+00	7.50E+00	1.50E+01
Percent of Limit	0.00E+00	4.06E-05	0.00E+00	0.00E+00	2.03E-05
<b><i>Tritium</i></b>					
Total Release (Ci)	4.61E+00	1.56E+01	5.91E+00	9.53E+00	3.56E+01
Maximum Organ Dose (mrem)	3.26E-03	1.10E-02	4.18E-03	6.74E-03	2.52E-02
Organ Dose Limit (mrem)	7.50E+00	7.50E+00	7.50E+00	7.50E+00	1.50E+01
Percent of Limit	4.35E-02	1.47E-01	5.57E-02	8.98E-02	1.68E-01
<b><i>Iodine</i></b>					
Total Release (Ci)	3.73E-07	8.53E-05	0.00E+00	0.00E+00	8.57E-05
Maximum Organ Dose (mrem)	2.15E-04	4.91E-02	0.00E+00	0.00E+00	4.93E-02
Organ Dose Limit (mrem)	7.50E+00	7.50E+00	7.50E+00	7.50E+00	1.50E+01
Percent of Limit	2.86E-03	6.54E-01	0.00E+00	0.00E+00	3.29E-01

## CALCULATIONS:

### Gases:

1. The percent of ODCM limit for fission and activation gases is calculated using the following methodology: (The larger value calculated between Gamma and Beta air dose is listed as the % of ODCM Limit)

$$\% \text{ of ODCM Limit} = \frac{(\text{Quarterly Total Beta Airdose})(100)}{10 \text{ mrad}}$$

OR

$$\% \text{ of ODCM Limit} = \frac{(\text{Quarterly Total Gamma Airdose})(100)}{5 \text{ mrad}}$$

2. The percent of ODCM limit for iodine is calculated using the following methodology:

$$\% \text{ of ODCM Limit} = \frac{(\text{Total Curies of Iodine} - 131)(100)}{1 \text{ Curie}}$$

3. The percent of ODCM limit for particulates is calculated using the following methodology:

$$\% \text{ of ODCM Limit} = \frac{(\text{Highest Organ Dose due to Particulates})(100)}{7.5 \text{ mrem}}$$

4. The percent of ODCM limit for tritium is calculated using the following methodology (this type of methodology is used since the Wolf Creek ODCM ties release limits to doses rather than curie release rates:

$$\% \text{ of ODCM Limit} = \frac{(\text{Highest Organ Dose due to H} - 3)(100)}{7.5 \text{ mrem}}$$

5. Less than values for Noble Gases are calculated using the Lower Limit of Detection (LLD) values obtained at WCGS multiplied by the volume of air discharged during the respective quarter. For the Halogens and Particulates, the ODCM LLD values are used.

### Liquids:

1. The Applicable Limit for fission and activation products at WCGS is 5 curies per year (reference 10CFR50, Appendix I, paragraph A.2). The percent of Applicable Limit is derived by the following:

$$\% \text{ of Applicable Limit} = \frac{(\text{Total Release Ci})(100)}{5 \text{ Ci}}$$

2. The percent of Applicable Limit for tritium is derived by the following formula:

$$\% \text{ of Applicable Limit} = \frac{(\text{Average Diluted Concentration})(100)}{(ECL^*)}$$

\*The ECL can be found in 10CFR20, Appendix B, Table 2

3. The percent of Applicable Limit for dissolved and entrained gases is derived by the following formula:

$$\% \text{ of Applicable Limit} = \frac{(\text{Average Diluted Concentration})(100)}{(2.00E - 04^*)}$$

\*From ODCM, section 2.1

4. Less than values are calculated using the Lower Limit of Detection (LLD) values listed in Table 2-1 of the ODCM multiplied by the volume of waste discharged during the respective quarter. The less than values are not included in the summation for the total release values.



**Appendix B**  
*Meteorological Data*

## HOURS AT EACH WIND SPEED AND DIRECTION

This section documents WCGS meteorological data for wind speed, wind direction, and atmospheric stability.

The meteorological data supplied in the following tables covers the period from January 1, 2018, through December 31, 2018, and indicates the number of hours at each wind speed and direction for each stability class. All gaseous releases at the WCGS are ground level releases.

WCGS did not meet Regulatory Guide 1.23 requirement for data recovery, for all instruments. The 60 Meter Wind Direction, due to instrument problems and weather concerns in the fourth quarter, had an 89.89% data recovery. Condition Report 131756 was written on the issue and work orders have since been completed fixing the issues. The 60 Meter Temperature instrument had an 88.97% data recovery for 2018, due to issues in the third quarter which calibration performance resolved. The remaining instruments, both at 10 and 60 meters, met or exceeded a 90% meteorological data recovery for 2018.

### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: A

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	0.75	8.50	12.25	7.75	2.00	0.00	31.25
NNE	5.75	30.25	24.50	3.75	2.00	0.00	66.25
NE	4.50	36.50	12.25	2.25	0.00	0.00	55.50
ENE	6.00	36.00	22.75	1.00	0.00	0.00	65.75
E	5.25	34.50	25.75	6.00	0.00	0.00	71.50
ESE	5.50	22.50	24.25	1.75	0.00	0.00	54.00
SE	7.50	44.25	42.50	10.50	0.50	0.00	105.25
SSE	6.25	57.25	84.25	49.50	4.25	0.50	202.00
S	3.00	42.50	68.75	139.25	83.00	20.00	356.50
SSW	2.50	21.75	46.50	55.50	10.00	4.00	140.25
SW	7.00	22.00	23.25	3.00	0.00	0.00	55.25
WSW	8.75	26.50	16.25	8.00	0.00	0.00	59.50
W	4.75	31.25	29.00	6.75	0.50	0.00	72.25
WNW	3.00	29.50	28.25	14.00	7.75	3.50	86.00
NW	2.50	20.50	20.75	7.00	4.75	4.50	60.00
NNW	1.50	12.00	20.00	17.00	4.00	0.75	55.25
Total	74.50	475.75	501.25	333.00	118.75	33.25	1536.50

Hours of Calm (<1.0 mph): 16.50

### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: B

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	0.00	3.00	7.75	7.50	1.50	0.00	19.75
NNE	1.25	6.25	8.75	1.00	0.50	0.00	17.75
NE	0.75	8.50	4.50	0.00	0.00	0.25	14.00
ENE	0.50	5.25	7.75	0.25	0.25	0.00	14.00
E	0.75	2.25	6.00	1.25	0.00	0.00	10.25
ESE	0.25	3.00	7.00	0.25	0.00	0.00	10.50
SE	1.50	3.75	7.75	2.75	0.00	0.00	15.75
SSE	1.00	11.00	17.00	9.25	2.25	0.00	40.50
S	1.75	7.50	18.50	20.75	5.25	2.00	55.75
SSW	0.00	5.00	12.25	7.75	0.75	0.25	26.00
SW	1.25	5.25	4.00	1.50	0.25	0.00	12.25
WSW	1.50	5.75	2.25	0.50	2.50	0.00	12.50
W	0.50	7.50	5.50	2.00	0.00	1.00	16.50
WNW	0.50	6.00	2.25	4.00	1.50	1.00	15.25
NW	0.25	4.00	7.75	2.75	3.75	4.00	22.50
NNW	0.50	3.25	12.50	11.25	5.75	1.00	34.25
Total	12.25	87.25	131.50	72.75	24.25	9.50	337.50

Hours of Calm (<1.0 mph): 3.75

### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: C

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	0.00	3.50	15.25	10.25	2.25	0.25	31.50
NNE	0.75	16.50	15.00	7.00	2.50	0.00	41.75
NE	1.25	10.75	6.25	0.50	0.00	0.00	18.75
ENE	1.00	8.25	7.00	1.00	0.00	0.00	17.25
E	1.25	3.75	5.00	1.25	0.00	0.00	11.25
ESE	0.75	4.75	6.75	0.00	0.00	0.00	12.25
SE	0.50	7.00	11.50	3.00	0.00	0.00	22.00
SSE	1.00	14.25	13.25	10.00	2.00	0.25	40.75
S	1.00	10.50	15.25	23.00	7.00	2.75	59.50
SSW	1.50	5.75	8.75	5.75	1.00	0.25	23.00
SW	2.25	7.00	3.25	0.50	0.00	0.00	13.00
WSW	2.25	8.00	4.00	4.00	0.50	0.00	18.75
W	1.25	7.50	1.75	2.75	2.50	1.25	17.00
WNW	0.75	6.25	0.75	6.50	6.25	1.25	21.75
NW	0.50	3.50	11.25	10.50	4.00	3.75	33.50
NNW	0.00	3.75	13.00	9.00	10.75	2.25	38.75
Total	16.00	121.00	138.00	95.00	38.75	12.00	420.75

Hours of Calm (<1.0 mph): 6.50

Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: D

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	3.50	37.00	101.50	106.00	23.25	2.50	273.75
NNE	13.00	93.25	93.75	47.50	3.75	0.75	252.00
NE	16.25	65.50	33.75	3.50	0.50	1.00	120.50
ENE	15.00	43.50	29.50	11.50	1.25	0.50	101.25
E	18.50	56.25	38.50	6.50	0.50	0.75	121.00
ESE	13.75	51.25	33.75	8.00	2.00	0.50	109.25
SE	6.25	37.25	63.25	22.25	3.75	1.75	134.50
SSE	7.25	57.50	136.00	80.00	13.00	0.75	294.50
S	8.50	35.00	123.50	150.25	48.25	10.75	376.25
SSW	7.00	26.75	88.75	37.75	12.75	5.00	178.00
SW	7.75	32.75	19.50	7.75	0.50	0.00	68.25
WSW	5.75	15.50	15.50	9.25	2.00	2.50	50.50
W	3.25	18.00	21.50	15.50	11.50	2.75	72.50
WNW	1.25	16.75	36.50	31.75	15.75	1.00	103.00
NW	4.25	27.00	66.00	59.75	19.00	6.50	182.50
NNW	7.25	56.25	143.25	88.50	34.00	9.25	338.50
Total	138.50	669.50	1044.50	685.75	191.75	46.25	2776.25

Hours of Calm (<1.0 mph): 70.00

### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: E

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	4.75	33.00	30.00	4.25	0.25	0.75	73.00
NNE	22.50	56.00	11.75	0.25	0.25	0.50	91.25
NE	24.00	38.75	9.75	0.75	0.00	0.25	73.50
ENE	22.00	54.75	22.00	1.25	0.00	0.00	100.00
E	24.75	54.00	23.00	0.75	0.25	0.25	103.00
ESE	22.25	86.50	25.75	5.00	0.25	0.00	139.75
SE	20.25	104.50	58.00	18.00	1.50	0.00	202.25
SSE	8.00	114.50	190.00	83.75	12.50	1.00	409.75
S	5.75	52.25	137.75	88.75	50.50	11.25	346.25
SSW	9.50	47.50	64.00	13.00	0.75	0.00	134.75
SW	21.75	55.75	6.75	1.75	1.25	0.00	87.25
WSW	7.75	24.00	9.25	0.75	0.25	0.25	42.25
W	4.50	20.00	8.50	2.25	0.75	0.25	36.25
WNW	3.50	19.50	16.00	1.75	0.75	0.25	41.75
NW	5.75	35.75	24.75	2.50	0.00	0.25	69.00
NNW	5.75	52.50	43.00	8.25	0.00	0.50	110.00
Total	212.75	849.25	680.25	233.00	69.25	15.50	2060.00

Hours of Calm (<1.0 mph): 47.25

### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: F

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	5.25	33.75	3.50	0.00	0.00	0.00	42.50
NNE	23.25	38.50	1.75	0.00	0.00	0.00	63.50
NE	21.25	23.75	0.75	0.00	0.00	0.00	45.75
ENE	13.50	45.50	3.75	0.00	0.00	0.00	62.75
E	23.25	63.50	5.75	0.00	0.00	0.00	92.50
ESE	27.75	86.50	4.25	0.00	0.00	0.00	118.50
SE	31.25	74.25	9.50	0.25	0.00	0.00	115.25
SSE	14.00	58.50	28.25	9.25	1.00	0.50	111.50
S	7.75	18.50	34.00	17.50	2.00	0.50	80.25
SSW	5.25	10.25	7.75	0.00	0.00	0.00	23.25
SW	6.50	17.50	1.50	0.25	0.00	0.50	26.25
WSW	7.00	8.25	4.00	0.25	0.00	0.00	19.50
W	3.00	7.50	2.00	0.00	0.00	0.00	12.50
WNW	4.50	4.00	0.00	0.00	0.00	0.50	9.00
NW	9.50	15.50	2.25	0.00	0.00	0.75	28.00
NNW	11.50	41.75	4.00	0.00	0.00	0.25	57.50
<b>Total</b>	<b>214.50</b>	<b>547.50</b>	<b>113.00</b>	<b>27.50</b>	<b>3.00</b>	<b>3.00</b>	<b>908.50</b>

Hours of Calm (<1.0 mph): 4.00



### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: G

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	7.50	21.25	3.25	0.00	0.00	0.00	32.00
NNE	25.75	45.50	1.00	0.00	0.00	0.00	72.25
NE	36.50	24.75	0.25	0.00	0.00	0.00	61.50
ENE	18.00	30.50	1.50	0.00	0.00	0.00	50.00
E	21.00	48.25	2.00	0.00	0.00	0.00	71.25
ESE	24.25	60.00	0.50	0.00	0.00	0.00	84.75
SE	19.00	39.00	0.50	0.00	0.50	0.00	59.00
SSE	9.25	22.50	2.25	1.00	0.25	0.00	35.25
S	3.50	5.75	0.75	0.25	0.25	0.25	10.75
SSW	6.75	0.75	0.75	0.00	0.00	0.25	8.50
SW	1.75	3.25	0.25	0.00	0.00	0.25	5.50
WSW	5.25	1.50	0.00	0.00	0.00	0.25	7.00
W	3.50	1.25	0.25	0.00	0.00	0.25	5.25
WNW	5.75	0.75	0.00	0.00	0.00	0.25	6.75
NW	6.75	12.00	0.25	0.00	0.00	0.00	19.00
NNW	13.75	20.75	2.00	0.00	0.00	0.00	36.50
Total	208.25	337.75	15.50	1.25	1.00	1.50	565.25

Hours of Calm (<1.0 mph): 3.00

### Hours At Each Wind Speed and Direction

Period of Record: JANUARY 1 THROUGH DECEMBER 31, 2018

Stability Class: ALL

Elevation: 10 Meters

Wind Direction Cardinals	Wind Speed (mph)						Total
	1-3	4-7	8-12	13-18	19-24	> 24	
N	21.75	140.00	173.50	135.75	29.25	3.50	503.75
NNE	92.25	286.25	156.50	59.50	9.00	1.25	604.75
NE	104.50	208.50	67.50	7.00	0.50	1.50	389.50
ENE	76.00	223.75	94.25	15.00	1.50	0.50	411.00
E	94.75	262.50	106.00	15.75	0.75	1.00	480.75
ESE	94.50	314.50	102.25	15.00	2.25	0.50	529.00
SE	86.25	310.00	193.00	56.75	6.25	1.75	654.00
SSE	46.75	335.50	471.00	242.75	35.25	3.00	1134.25
S	31.25	172.00	398.50	439.75	196.25	47.50	1285.25
SSW	32.50	117.75	228.75	119.75	25.25	9.75	533.75
SW	48.25	143.50	58.50	14.75	2.00	0.75	267.75
WSW	38.25	89.50	51.25	22.75	5.25	3.00	210.00
W	20.75	93.00	68.50	29.25	15.25	5.50	232.25
WNW	19.25	82.75	83.75	58.00	32.00	7.75	283.50
NW	29.50	118.25	133.00	82.50	31.50	19.75	414.50
NNW	40.25	190.25	237.75	134.00	54.50	14.00	670.75
Total	876.75	3088.00	2624.00	1448.25	446.75	121.00	8604.75

Hours of Calm (<1.0 mph): 151.00

Maximum Hours of invalid Data: 2043.50

**Appendix C**  
**ONSITE GROUNDWATER PROTECTION PROGRAM MONITORING**

### Objective

The objective of onsite groundwater protection program monitoring is to ensure timely detection of inadvertent radiological releases to ground water. At the Wolf Creek Generating Station, some background tritium influences from lake water reuse are normal and expected.

### Basis

The onsite groundwater protection program monitoring sample results are being reported in the Radioactive Effluent Release Report per guidance received in association with the Nuclear Energy Institute (NEI) Groundwater Protection Industry Initiative. The following information is also being reported in association with the NEI Groundwater Protection Industry Initiative:

1. Describe any onsite licensed radioactive materials releases or spills that were voluntarily communicated to State/Local officials during the calendar year. - None
2. Describe any onsite groundwater sample results that exceeded the reporting thresholds that were voluntarily communicated to State/Local officials during the calendar year. - None

There were no radioactive materials releases, spills, or reporting level exceedances reported to State/Local officials during 2018.

### Onsite Groundwater Protection Program Monitoring Description

In March of 2006, Wolf Creek Generating Station (WCGS) established an onsite groundwater protection monitoring program. During 2008, thirteen monitoring wells were added to the onsite groundwater protection monitoring program. During 2018, an additional five wells were installed. The onsite groundwater protection program monitoring is implemented via procedure AI 07-007, *Onsite Groundwater Protection Program Monitoring*. The onsite groundwater samples were collected by the WCGS Environmental Management group and were analyzed by Environmental, Inc., Midwest Laboratory. Onsite groundwater samples were collected quarterly when available and were analyzed by gamma isotopic analysis, radiochemical analysis for I-131 and tritium analysis. The vendor lab (Environmental, Inc., Midwest Laboratory) participated in an interlaboratory comparison program. The following tables describe the sample locations, the lower limits of detection and the reporting levels for radioactivity detected.

Sample Location	Sample Location Description
AUX	Dewatering Well located near the Auxiliary Building, on East Side
EAST ESW-W	Essential Service Water Dewatering Well, East Group, West well, located southeast of the reactor
MW-01A	Monitoring Well, shallow depth, located northeast of the reactor (control sample location)
MW-01B	Monitoring Well, mid-range depth, located northeast of the reactor (control sample location)
MW-01C	Monitoring Well, deep depth, located northeast of the reactor (control sample location)
MW-02A	Monitoring Well, shallow depth, located northwest of the reactor
MW-02B	Monitoring Well, mid-range depth, located northwest of the reactor
MW-03A	Monitoring Well, shallow depth, located southwest of the reactor
MW-03B	Monitoring Well, mid-range depth, located southwest of the reactor
MW-03C	Monitoring Well, deep depth, located southwest of the reactor
MW-05C	Monitoring Well, deep depth, located south of the reactor
MW-11A	Monitoring Well, shallow depth, located southwest of the reactor
MW-11B	Monitoring Well, mid-range depth, located southwest of the reactor
MW-12A	Monitoring Well, shallow depth, located south of the reactor
MW-12B	Monitoring Well, mid-range depth, located south of the reactor
MW-13	Monitoring Well, mid-range depth, located south of the reactor
MW-14	Monitoring Well, mid-range depth, located southeast of the reactor
MW-15	Monitoring Well, mid-range depth, located southeast of the reactor
MW-16	Monitoring Well, mid-range depth, located southeast of the reactor
MW-17	Monitoring Well, mid-range depth, located southeast of the reactor
WEST ESW-W	Essential Service Water Dewatering Well, West Group, West well, located south of the reactor

Onsite Groundwater Lower Limits of Detection

Analysis	(pCi/L)	Analysis	(pCi/L)
H-3	2,000	Zr-Nb-95	15
Mn-54	15	I-131	1
Co-58	15	Cs-134	15
Fe-59	30	Cs-137	18
Co-60	15	Ba-La-140	15
Zn-65	30		

## Reporting Levels for Radioactivity Detected in Onsite Groundwater

Analysis	(pCi/L)	Analysis	(pCi/L)
H-3	20,000	Zr-Nb-95	400
Mn-54	1,000	I-131	2
Co-58	1,000	Cs-134	30
Fe-59	400	Cs-137	50
Co-60	300	Ba-La-140	200
Zn-65	300		

### Discussion of Results

Low levels of tritium were detected in an Essential Service Water dewatering well (EAST ESW-W), MW-15, MW-17, MW-12A and in the dewatering well located near the Auxiliary Building (AUX), all within areas of backfill during plant construction. This has been attributed to the Plant's reuse of tritiated lake water and is consistent with gaseous tritium deposition during normal operation. Lake water is used for plant cooling, which includes essential service water, and in the Fire Protection System.

The monitoring well sample with the highest level of tritium detected (590 +/- 102 pCi/L) was collected on 02-26-18 from the MW-15 location. The measured monitoring well tritium levels are significantly lower than the tritium levels routinely detected in surface water collected from Coffey County Lake (2018 range was 9,101 to 14,775 pCi/L).

The tritium activity was the only activity detected in the onsite groundwater samples. Lower limits of detection were met and sample analysis results were below the applicable reporting levels.

### Subsurface Water

Due to Industry Operating Experience, the Wolf Creek Generating Station started collecting and analyzing subsurface water during 2010. Subsurface water monitoring is a portion of the Groundwater Protection Program and is implemented via procedure AI 07-007, *Onsite Groundwater Protection Program Monitoring*. The definitions for subsurface water include:

1. Water that is encountered below grade while excavating, trenching, or drilling outside of the Radiologically Controlled Area and within the area displayed in Figure 1 (of AI 07-007). This excludes recent rainfall build-up in open excavation trenches.
2. Water that is encountered below grade or water that needs to be removed that is outside of a building, outside of the Radiologically Controlled Area and within the area displayed in Figure 1 (of AI 07-007). Examples include electrical vaults, piping vaults, valve pits, manholes, concrete pits, etc. Excludes removing water from powerblock sumps, sanitary sewers, spill containment berms or from within buildings.

The subsurface water samples were analyzed by the WCGS Chemistry Laboratory and the results were reviewed by Environmental Management. The subsurface water samples were analyzed for tritium. The following table identifies the sample dates, sample locations, and the analysis results.

Date	Location Description	Tritium (pCi/L)
01/30/18	CW-1 (1CW0006C) Manhole North of the Turbine Building	18,420
01/31/18	CW-1 (1CW0006C) Manhole North of the Turbine Building	17,062
03/20/18	EMH101 Electrical Manhole North of the Turbine Building	<2,210
03/20/18	EMH102 Electrical Manhole NW of Maintenance Shop	<1,990
03/20/18	EMH104 Electrical Manhole West of Shop Building	<1,742
03/20/18	EMH105 Electrical Manhole West of Olive Ann Beech Building.	<1,938
05/01/18	CW-1 (1CW0006C) Manhole North of the Turbine Building	<2,402
05/29/18	Dewatering Well #1 (1DW0001) - East of the Turbine Building	10,000
05/29/18	Dewatering Well #5 (1DW0005) - West of Hot Machine Shop	3,580
05/29/18	Dewatering Well #7 (1DW0007) - SW of Com. Corridor	4,200
07/10/18	XMA01A, XMA01B, XMA01C & XMA02 Transformer Discharge Vault, Sump 097 (Main); Transformer NW of Turbine Building	<1,847
07/10/18	XMA01D Transformer Discharge Vault, Sump 0725; Transformer NW of Turbine Building	<1,830
07/10/18	XMR01 Transformer Discharge Vault, Sump 096; Transformer NW of Turbine Building	<2,176
07/10/18	XNB01 & XNB02 Transformer Discharge Vault, Sump 095; Transformer NW of Turbine Building	4,809
07/30/18	CW-1 (1CW0006C) Manhole North of the Turbine Building	<1,920
07/30/18	CW-3 (1CW0008C) Manhole near the Radwaste Building	2,386
08/27/18	CW-1 (1CW0006C) Manhole North of the Turbine Building	<2,071
08/27/18	CW-2 (1CW0007C) Manhole East of Condensate Storage Tank	<2,233
08/27/18	CW-3 (1CW0008C) Manhole near the Radwaste Building	<1,950
08/27/18	Dewatering Well #1 (1DW0001) - East of the Turbine Building	10,000
08/27/18	Dewatering Well #5 (1DW0005) - West of Hot Machine Shop	3,580
08/27/18	Dewatering Well #7 (1DW0007) - SW of Com. Corridor	4,200
09/25/18	EMH105 Electrical Manhole West of Olive Ann Beech Building.	<2,051
09/25/18	EMH105 Electrical Manhole West of Olive Ann Beech Building.	<1,757
09/25/18	EMH105 Electrical Manhole West of Olive Ann Beech Building.	<1,896
09/25/18	EMH105 Electrical Manhole West of Olive Ann Beech Building.	5,883
09/26/18	AUX remediation well located near CST	5,832
10/08/18	EMH105 Electrical Manhole West of Olive Ann Beech Building.	<1,827
10/08/18	EMH119 located NW of Main and Aux. Yard Transformers	2,299
10/08/18	EMH120 located NE of Turbine Building	1,870
10/08/18	EMH137 between Security Building and Containment.	5,346
10/16/18	CW-3 (1CW0008C) Manhole near the Radwaste Building	<1,937
10/16/18	EMH104 West of the Mechanical Maintenance Shop	<2,034
10/29/18	CW-1 (1CW0006C) Manhole North of the Turbine Building	4,799
11/26/18	Dewatering Well #1 (1DW0001) - East of the Turbine Building	<2,122
11/26/18	Dewatering Well #2 (1DW0002) - East of the Turbine Building	14,110
11/26/18	Dewatering Well #3 (1DW0003) - West of the Turbine Building	<1,866
11/26/18	Dewatering Well #5 (1DW0005) - West of Hot Machine Shop	<2,412
11/26/18	Dewatering Well #7 (1DW0007) - SW of Com. Corridor	6,676
12/10/18	EMH104 Electrical Manhole West of Shop Building	<1,938
12/10/18	EMH119 Electrical Manhole NW of Main & Aux. Transformers	4,747
12/10/18	EMH125 Electrical Manhole East of Turbine Building	2,610
12/10/18	EMH135 Electrical Manhole West of Radwaste Building	<1,872

As expected, tritium activity was detected in some of the subsurface water samples. The highest detected tritium measured was 18,420 pCi/L in a sample collected 01-30-18 from manhole CW-1 (1CW0006C) located north of the Turbine Building. Gamma activity was not detected in the 01-30-18 subsurface water sample. Again, the detected tritium activity is likely due to the Plant's reuse of tritiated lake water. Lake water is used for plant cooling, which includes essential service water, and in the Fire Protection System. The measured tritium levels from subsurface water monitoring were lower than the onsite groundwater tritium reporting level of 20,000 pCi/L. Condition Report 119118 was created to document occurrence. Follow-up analysis detected 17,062 pCi/L.

#### Conclusion

Based upon the results of the water samples that were analyzed in association with the Onsite Groundwater Protection Program, no inadvertent radiological releases to ground water were identified.



**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
AUX	26-Sep-18	H-3	5183	+/-		
EAST ESW-W	26-Feb-18	MN-54		<	3.2	
EAST ESW-W	26-Feb-18	CO-58		<	2.3	
EAST ESW-W	26-Feb-18	FE-59		<	4.4	
EAST ESW-W	26-Feb-18	CO-60		<	1.7	
EAST ESW-W	26-Feb-18	ZN-65		<	4.7	
EAST ESW-W	26-Feb-18	ZR-NB-95		<	3.4	
EAST ESW-W	26-Feb-18	I-131		<	0.31	
EAST ESW-W	26-Feb-18	CS-134		<	2.7	
EAST ESW-W	26-Feb-18	CS-137		<	2.7	
EAST ESW-W	26-Feb-18	BA-LA-140		<	2.6	
EAST ESW-W	26-Feb-18	H-3		<	162	
EAST ESW-W	02-May-18	MN-54		<	2.6	
EAST ESW-W	02-May-18	CO-58		<	3.1	
EAST ESW-W	02-May-18	FE-59		<	4.6	
EAST ESW-W	02-May-18	CO-60		<	2.4	
EAST ESW-W	02-May-18	ZN-65		<	3.4	
EAST ESW-W	02-May-18	ZR-NB-95		<	2.8	
EAST ESW-W	02-May-18	I-131		<	0.303	
EAST ESW-W	02-May-18	CS-134		<	2.6	
EAST ESW-W	02-May-18	CS-137		<	2.9	
EAST ESW-W	02-May-18	BA-LA-140		<	3.8	
EAST ESW-W	02-May-18	H-3	180	+/-	102	
EAST ESW-W	29-Aug-18	MN-54		<	1.8	
EAST ESW-W	29-Aug-18	CO-58		<	1.3	
EAST ESW-W	29-Aug-18	FE-59		<	5.3	
EAST ESW-W	29-Aug-18	CO-60		<	1.3	
EAST ESW-W	29-Aug-18	ZN-65		<	5	
EAST ESW-W	29-Aug-18	ZR-NB-95		<	3.4	
EAST ESW-W	29-Aug-18	I-131		<	0.479	
EAST ESW-W	29-Aug-18	CS-134		<	3	
EAST ESW-W	29-Aug-18	CS-137		<	3	
EAST ESW-W	29-Aug-18	BA-LA-140		<	3.5	
EAST ESW-W	29-Aug-18	H-3		<	156	
EAST ESW-W	04-Dec-18	MN-54		<	3.6	
EAST ESW-W	04-Dec-18	CO-58		<	1.8	
EAST ESW-W	04-Dec-18	FE-59		<	6.9	
EAST ESW-W	04-Dec-18	CO-60		<	3.7	
EAST ESW-W	04-Dec-18	ZN-65		<	7.2	
EAST ESW-W	04-Dec-18	ZR-NB-95		<	4	
EAST ESW-W	04-Dec-18	I-131		<	0.319	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
EAST ESW-W	04-Dec-18	CS-134		<	4.1	
EAST ESW-W	04-Dec-18	CS-137		<	3.7	
EAST ESW-W	04-Dec-18	BA-LA-140		<	1.9	
EAST ESW-W	04-Dec-18	H-3	189	+/-	82	
MW-01A	26-Feb-18	MN-54		<	3.9	
MW-01A	26-Feb-18	CO-58		<	2.5	
MW-01A	26-Feb-18	FE-59		<	4.2	
MW-01A	26-Feb-18	CO-60		<	4	
MW-01A	26-Feb-18	ZN-65		<	8.1	
MW-01A	26-Feb-18	ZR-NB-95		<	2	
MW-01A	26-Feb-18	I-131		<	0.304	
MW-01A	26-Feb-18	CS-134		<	3.7	
MW-01A	26-Feb-18	CS-137		<	4	
MW-01A	26-Feb-18	BA-LA-140		<	4	
MW-01A	26-Feb-18	H-3		<	155	
MW-01A	02-May-18	MN-54		<	4.3	
MW-01A	02-May-18	CO-58		<	2.3	
MW-01A	02-May-18	FE-59		<	2.7	
MW-01A	02-May-18	CO-60		<	4	
MW-01A	02-May-18	ZN-65		<	5.4	
MW-01A	02-May-18	ZR-NB-95		<	2.8	
MW-01A	02-May-18	I-131		<	0.321	
MW-01A	02-May-18	CS-134		<	4.9	
MW-01A	02-May-18	CS-137		<	4.5	
MW-01A	02-May-18	BA-LA-140		<	1.9	
MW-01A	02-May-18	H-3		<	154	
MW-01A	29-Aug-18	MN-54		<	2.1	
MW-01A	29-Aug-18	CO-58		<	2.5	
MW-01A	29-Aug-18	FE-59		<	4	
MW-01A	29-Aug-18	CO-60		<	1.2	
MW-01A	29-Aug-18	ZN-65		<	3.5	
MW-01A	29-Aug-18	ZR-NB-95		<	3.2	
MW-01A	29-Aug-18	I-131		<	0.442	
MW-01A	29-Aug-18	CS-134		<	3.1	
MW-01A	29-Aug-18	CS-137		<	3.2	
MW-01A	29-Aug-18	BA-LA-140		<	2.6	
MW-01A	29-Aug-18	H-3		<	156	
MW-01A	05-Dec-18	MN-54		<	2.5	
MW-01A	05-Dec-18	CO-58		<	3.4	
MW-01A	05-Dec-18	FE-59		<	6.3	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-01A	05-Dec-18	CO-60		<	2.2	
MW-01A	05-Dec-18	ZN-65		<	6.8	
MW-01A	05-Dec-18	ZR-NB-95		<	2.6	
MW-01A	05-Dec-18	I-131		<	0.467	
MW-01A	05-Dec-18	CS-134		<	3.8	
MW-01A	05-Dec-18	CS-137		<	3.2	
MW-01A	05-Dec-18	BA-LA-140		<	4.1	
MW-01A	05-Dec-18	H-3		<	157	
MW-01B	26-Feb-18	MN-54		<	2.7	
MW-01B	26-Feb-18	CO-58		<	2.4	
MW-01B	26-Feb-18	FE-59		<	3.5	
MW-01B	26-Feb-18	CO-60		<	1.9	
MW-01B	26-Feb-18	ZN-65		<	5.7	
MW-01B	26-Feb-18	ZR-NB-95		<	2.2	
MW-01B	26-Feb-18	I-131		<	0.25	
MW-01B	26-Feb-18	CS-134		<	3	
MW-01B	26-Feb-18	CS-137		<	3.1	
MW-01B	26-Feb-18	BA-LA-140		<	3.2	
MW-01B	26-Feb-18	H-3		<	155	
MW-01B	02-May-18	MN-54		<	2.1	
MW-01B	02-May-18	CO-58		<	3.2	
MW-01B	02-May-18	FE-59		<	4.9	
MW-01B	02-May-18	CO-60		<	1.2	
MW-01B	02-May-18	ZN-65		<	2.7	
MW-01B	02-May-18	ZR-NB-95		<	2	
MW-01B	02-May-18	I-131		<	0.472	
MW-01B	02-May-18	CS-134		<	3.2	
MW-01B	02-May-18	CS-137		<	2.6	
MW-01B	02-May-18	BA-LA-140		<	3	
MW-01B	02-May-18	H-3		<	156	
MW-01B	29-Aug-18	MN-54		<	1.2	
MW-01B	29-Aug-18	CO-58		<	3.1	
MW-01B	29-Aug-18	FE-59		<	6.3	
MW-01B	29-Aug-18	CO-60		<	2.3	
MW-01B	29-Aug-18	ZN-65		<	3.5	
MW-01B	29-Aug-18	ZR-NB-95		<	3.6	
MW-01B	29-Aug-18	I-131		<	0.462	
MW-01B	29-Aug-18	CS-134		<	3.8	
MW-01B	29-Aug-18	CS-137		<	3.2	
MW-01B	29-Aug-18	BA-LA-140		<	2.2	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-01B	29-Aug-18	H-3		<	156	
MW-01B	04-Dec-18	MN-54		<	2.2	
MW-01B	04-Dec-18	CO-58		<	2.2	
MW-01B	04-Dec-18	FE-59		<	4.4	
MW-01B	04-Dec-18	CO-60		<	2.5	
MW-01B	04-Dec-18	ZN-65		<	2.9	
MW-01B	04-Dec-18	ZR-NB-95		<	3.4	
MW-01B	04-Dec-18	I-131		<	0.28	
MW-01B	04-Dec-18	CS-134		<	3.5	
MW-01B	04-Dec-18	CS-137		<	3.9	
MW-01B	04-Dec-18	BA-LA-140		<	1.5	
MW-01B	04-Dec-18	H-3		<	153	
MW-01C	26-Feb-18	MN-54		<	2	
MW-01C	26-Feb-18	CO-58		<	2.3	
MW-01C	26-Feb-18	FE-59		<	4.3	
MW-01C	26-Feb-18	CO-60		<	2.2	
MW-01C	26-Feb-18	ZN-65		<	3.8	
MW-01C	26-Feb-18	ZR-NB-95		<	3.2	
MW-01C	26-Feb-18	I-131		<	0.293	
MW-01C	26-Feb-18	CS-134		<	3.4	
MW-01C	26-Feb-18	CS-137		<	2.9	
MW-01C	26-Feb-18	BA-LA-140		<	2	
MW-01C	26-Feb-18	H-3		<	155	
MW-01C	02-May-18	MN-54		<	2.4	
MW-01C	02-May-18	CO-58		<	1.9	
MW-01C	02-May-18	FE-59		<	4.5	
MW-01C	02-May-18	CO-60		<	2.1	
MW-01C	02-May-18	ZN-65		<	3.3	
MW-01C	02-May-18	ZR-NB-95		<	1.9	
MW-01C	02-May-18	I-131		<	0.423	
MW-01C	02-May-18	CS-134		<	3.4	
MW-01C	02-May-18	CS-137		<	2.4	
MW-01C	02-May-18	BA-LA-140		<	3.2	
MW-01C	02-May-18	H-3		<	156	
MW-01C	29-Aug-18	MN-54		<	3	
MW-01C	29-Aug-18	CO-58		<	2.8	
MW-01C	29-Aug-18	FE-59		<	5.2	
MW-01C	29-Aug-18	CO-60		<	2.3	
MW-01C	29-Aug-18	ZN-65		<	4.5	
MW-01C	29-Aug-18	ZR-NB-95		<	3.3	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-01C	29-Aug-18	I-131		<	0.469	
MW-01C	29-Aug-18	CS-134		<	4.3	
MW-01C	29-Aug-18	CS-137		<	4.1	
MW-01C	29-Aug-18	BA-LA-140		<	3.5	
MW-01C	29-Aug-18	H-3		<	156	
MW-01C	05-Dec-18	MN-54		<	2.7	
MW-01C	05-Dec-18	CO-58		<	3.2	
MW-01C	05-Dec-18	FE-59		<	6.1	
MW-01C	05-Dec-18	CO-60		<	2.5	
MW-01C	05-Dec-18	ZN-65		<	4.8	
MW-01C	05-Dec-18	ZR-NB-95		<	2.3	
MW-01C	05-Dec-18	I-131		<	0.365	
MW-01C	05-Dec-18	CS-134		<	3.5	
MW-01C	05-Dec-18	CS-137		<	3.9	
MW-01C	05-Dec-18	BA-LA-140		<	2	
MW-01C	05-Dec-18	H-3		<	157	
MW-02A	26-Feb-18	MN-54		<	2.9	
MW-02A	26-Feb-18	CO-58		<	3	
MW-02A	26-Feb-18	FE-59		<	5	
MW-02A	26-Feb-18	CO-60		<	3.2	
MW-02A	26-Feb-18	ZN-65		<	6.4	
MW-02A	26-Feb-18	ZR-NB-95		<	2.7	
MW-02A	26-Feb-18	I-131		<	0.27	
MW-02A	26-Feb-18	CS-134		<	3.7	
MW-02A	26-Feb-18	CS-137		<	2.5	
MW-02A	26-Feb-18	BA-LA-140		<	2.3	
MW-02A	26-Feb-18	H-3		<	155	
MW-02A	02-May-18	MN-54		<	2.4	
MW-02A	02-May-18	CO-58		<	2.2	
MW-02A	02-May-18	FE-59		<	8.2	
MW-02A	02-May-18	CO-60		<	3.9	
MW-02A	02-May-18	ZN-65		<	5.2	
MW-02A	02-May-18	ZR-NB-95		<	3.3	
MW-02A	02-May-18	I-131		<	0.379	
MW-02A	02-May-18	CS-134		<	4.4	
MW-02A	02-May-18	CS-137		<	3.3	
MW-02A	02-May-18	BA-LA-140		<	3	
MW-02A	02-May-18	H-3		<	156	
MW-02A	29-Aug-18	MN-54		<	4.6	
MW-02A	29-Aug-18	CO-58		<	3.8	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-02A	29-Aug-18	FE-59		<	9.7	
MW-02A	29-Aug-18	CO-60		<	3	
MW-02A	29-Aug-18	ZN-65		<	10.8	
MW-02A	29-Aug-18	ZR-NB-95		<	5.4	
MW-02A	29-Aug-18	I-131		<	0.399	
MW-02A	29-Aug-18	CS-134		<	5.2	
MW-02A	29-Aug-18	CS-137		<	4.5	
MW-02A	29-Aug-18	BA-LA-140		<	5	
MW-02A	29-Aug-18	H-3		<	156	
MW-02A	04-Dec-18	MN-54		<	2.6	
MW-02A	04-Dec-18	CO-58		<	3.2	
MW-02A	04-Dec-18	FE-59		<	5.9	
MW-02A	04-Dec-18	CO-60		<	3.1	
MW-02A	04-Dec-18	ZN-65		<	3.2	
MW-02A	04-Dec-18	ZR-NB-95		<	4.5	
MW-02A	04-Dec-18	I-131		<	0.282	
MW-02A	04-Dec-18	CS-134		<	4.2	
MW-02A	04-Dec-18	CS-137		<	4.9	
MW-02A	04-Dec-18	BA-LA-140		<	3.8	
MW-02A	04-Dec-18	H-3		<	153	
MW-02B	26-Feb-18	MN-54		<	3.4	
MW-02B	26-Feb-18	CO-58		<	2.5	
MW-02B	26-Feb-18	FE-59		<	3.4	
MW-02B	26-Feb-18	CO-60		<	3.1	
MW-02B	26-Feb-18	ZN-65		<	7	
MW-02B	26-Feb-18	ZR-NB-95		<	3.6	
MW-02B	26-Feb-18	I-131		<	0.245	
MW-02B	26-Feb-18	CS-134		<	3.1	
MW-02B	26-Feb-18	CS-137		<	2.8	
MW-02B	26-Feb-18	BA-LA-140		<	3.3	
MW-02B	26-Feb-18	H-3		<	155	
MW-02B	02-May-18	MN-54		<	2.6	
MW-02B	02-May-18	CO-58		<	2.8	
MW-02B	02-May-18	FE-59		<	4.7	
MW-02B	02-May-18	CO-60		<	2.4	
MW-02B	02-May-18	ZN-65		<	3.8	
MW-02B	02-May-18	ZR-NB-95		<	2.9	
MW-02B	02-May-18	I-131		<	0.484	
MW-02B	02-May-18	CS-134		<	3.4	
MW-02B	02-May-18	CS-137		<	2.3	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-02B	02-May-18	BA-LA-140		<	1.7	
MW-02B	02-May-18	H-3		<	156	
MW-02B	29-Aug-18	MN-54		<	2.5	
MW-02B	29-Aug-18	CO-58		<	1.5	
MW-02B	29-Aug-18	FE-59		<	6	
MW-02B	29-Aug-18	CO-60		<	2.8	
MW-02B	29-Aug-18	ZN-65		<	6.4	
MW-02B	29-Aug-18	ZR-NB-95		<	3.3	
MW-02B	29-Aug-18	I-131		<	0.461	
MW-02B	29-Aug-18	CS-134		<	3.3	
MW-02B	29-Aug-18	CS-137		<	2.9	
MW-02B	29-Aug-18	BA-LA-140		<	5.3	
MW-02B	29-Aug-18	H-3		<	156	
MW-02B	04-Dec-18	MN-54		<	3.3	
MW-02B	04-Dec-18	CO-58		<	2.2	
MW-02B	04-Dec-18	FE-59		<	4.8	
MW-02B	04-Dec-18	CO-60		<	1.8	
MW-02B	04-Dec-18	ZN-65		<	4.1	
MW-02B	04-Dec-18	ZR-NB-95		<	3.1	
MW-02B	04-Dec-18	I-131		<	0.308	
MW-02B	04-Dec-18	CS-134		<	3	
MW-02B	04-Dec-18	CS-137		<	2.2	
MW-02B	04-Dec-18	BA-LA-140		<	2.1	
MW-02B	04-Dec-18	H-3		<	153	
MW-03A	26-Feb-18	MN-54		<	3.2	
MW-03A	26-Feb-18	CO-58		<	5.5	
MW-03A	26-Feb-18	FE-59		<	5.5	
MW-03A	26-Feb-18	CO-60		<	4.7	
MW-03A	26-Feb-18	ZN-65		<	8.2	
MW-03A	26-Feb-18	ZR-NB-95		<	4.1	
MW-03A	26-Feb-18	I-131		<	0.367	
MW-03A	26-Feb-18	CS-134		<	5.5	
MW-03A	26-Feb-18	CS-137		<	4.2	
MW-03A	26-Feb-18	BA-LA-140		<	4	
MW-03A	26-Feb-18	H-3		<	155	
MW-03A	02-May-18	MN-54		<	4.4	
MW-03A	02-May-18	CO-58		<	3.9	
MW-03A	02-May-18	FE-59		<	6.7	
MW-03A	02-May-18	CO-60		<	2.4	
MW-03A	02-May-18	ZN-65		<	5.2	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-03A	02-May-18	ZR-NB-95		<	3.6	
MW-03A	02-May-18	I-131		<	0.316	
MW-03A	02-May-18	CS-134		<	4.7	
MW-03A	02-May-18	CS-137		<	2.4	
MW-03A	02-May-18	BA-LA-140		<	1.8	
MW-03A	02-May-18	H-3		<	156	
MW-03A	29-Aug-18	MN-54		<	3.5	
MW-03A	29-Aug-18	CO-58		<	1.7	
MW-03A	29-Aug-18	FE-59		<	5.8	
MW-03A	29-Aug-18	CO-60		<	3	
MW-03A	29-Aug-18	ZN-65		<	5.6	
MW-03A	29-Aug-18	ZR-NB-95		<	2.9	
MW-03A	29-Aug-18	I-131		<	0.43	
MW-03A	29-Aug-18	CS-134		<	4.2	
MW-03A	29-Aug-18	CS-137		<	3	
MW-03A	29-Aug-18	BA-LA-140		<	3.8	
MW-03A	29-Aug-18	H-3		<	156	
MW-03A	04-Dec-18	MN-54		<	3.4	
MW-03A	04-Dec-18	CO-58		<	1.9	
MW-03A	04-Dec-18	FE-59		<	8.2	
MW-03A	04-Dec-18	CO-60		<	3.7	
MW-03A	04-Dec-18	ZN-65		<	6.3	
MW-03A	04-Dec-18	ZR-NB-95		<	4.3	
MW-03A	04-Dec-18	I-131		<	0.306	
MW-03A	04-Dec-18	CS-134		<	4.5	
MW-03A	04-Dec-18	CS-137		<	3.4	
MW-03A	04-Dec-18	BA-LA-140		<	2.2	
MW-03A	04-Dec-18	H-3		<	153	
MW-03B	26-Feb-18	MN-54		<	1.6	
MW-03B	26-Feb-18	CO-58		<	1.7	
MW-03B	26-Feb-18	FE-59		<	3.7	
MW-03B	26-Feb-18	CO-60		<	2.3	
MW-03B	26-Feb-18	ZN-65		<	3.1	
MW-03B	26-Feb-18	ZR-NB-95		<	3.2	
MW-03B	26-Feb-18	I-131		<	0.374	
MW-03B	26-Feb-18	CS-134		<	3.4	
MW-03B	26-Feb-18	CS-137		<	2.9	
MW-03B	26-Feb-18	BA-LA-140		<	1.8	
MW-03B	26-Feb-18	H-3		<	155	
MW-03B	02-May-18	MN-54		<	2.7	



**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-03B	02-May-18	CO-58		<	2	
MW-03B	02-May-18	FE-59		<	5	
MW-03B	02-May-18	CO-60		<	1.5	
MW-03B	02-May-18	ZN-65		<	6.7	
MW-03B	02-May-18	ZR-NB-95		<	2.9	
MW-03B	02-May-18	I-131		<	0.42	
MW-03B	02-May-18	CS-134		<	3.1	
MW-03B	02-May-18	CS-137		<	3.3	
MW-03B	02-May-18	BA-LA-140		<	2.4	
MW-03B	02-May-18	H-3		<	156	
MW-03B	29-Aug-18	MN-54		<	2.1	
MW-03B	29-Aug-18	CO-58		<	1.6	
MW-03B	29-Aug-18	FE-59		<	3.6	
MW-03B	29-Aug-18	CO-60		<	3	
MW-03B	29-Aug-18	ZN-65		<	2.1	
MW-03B	29-Aug-18	ZR-NB-95		<	3.2	
MW-03B	29-Aug-18	I-131		<	0.433	
MW-03B	29-Aug-18	CS-134		<	2.9	
MW-03B	29-Aug-18	CS-137		<	3.7	
MW-03B	29-Aug-18	BA-LA-140		<	2.2	
MW-03B	29-Aug-18	H-3		<	156	
MW-03B	04-Dec-18	MN-54		<	2.6	
MW-03B	04-Dec-18	CO-58		<	1.1	
MW-03B	04-Dec-18	FE-59		<	6.4	
MW-03B	04-Dec-18	CO-60		<	2.6	
MW-03B	04-Dec-18	ZN-65		<	4.6	
MW-03B	04-Dec-18	ZR-NB-95		<	3	
MW-03B	04-Dec-18	I-131		<	0.266	
MW-03B	04-Dec-18	CS-134		<	4.1	
MW-03B	04-Dec-18	CS-137		<	3.4	
MW-03B	04-Dec-18	BA-LA-140		<	3.9	
MW-03B	04-Dec-18	H-3		<	153	
MW-03C	26-Feb-18	MN-54		<	3.1	
MW-03C	26-Feb-18	CO-58		<	4	
MW-03C	26-Feb-18	FE-59		<	5.1	
MW-03C	26-Feb-18	CO-60		<	1.9	
MW-03C	26-Feb-18	ZN-65		<	3.6	
MW-03C	26-Feb-18	ZR-NB-95		<	2.4	
MW-03C	26-Feb-18	I-131		<	0.426	
MW-03C	26-Feb-18	CS-134		<	2.8	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-03C	26-Feb-18	CS-137		<	3.2	
MW-03C	26-Feb-18	BA-LA-140		<	1.9	
MW-03C	26-Feb-18	H-3		<	155	
MW-03C	02-May-18	MN-54		<	3.1	
MW-03C	02-May-18	CO-58		<	2.6	
MW-03C	02-May-18	FE-59		<	2.6	
MW-03C	02-May-18	CO-60		<	1.6	
MW-03C	02-May-18	ZN-65		<	2.6	
MW-03C	02-May-18	ZR-NB-95		<	2	
MW-03C	02-May-18	I-131		<	0.307	
MW-03C	02-May-18	CS-134		<	2.9	
MW-03C	02-May-18	CS-137		<	4	
MW-03C	02-May-18	BA-LA-140		<	3	
MW-03C	02-May-18	H-3		<	156	
MW-03C	29-Aug-18	MN-54		<	3.1	
MW-03C	29-Aug-18	CO-58		<	1.5	
MW-03C	29-Aug-18	FE-59		<	5.1	
MW-03C	29-Aug-18	CO-60		<	1.8	
MW-03C	29-Aug-18	ZN-65		<	4.6	
MW-03C	29-Aug-18	ZR-NB-95		<	3.7	
MW-03C	29-Aug-18	I-131		<	0.425	
MW-03C	29-Aug-18	CS-134		<	3.4	
MW-03C	29-Aug-18	CS-137		<	4.1	
MW-03C	29-Aug-18	BA-LA-140		<	2.4	
MW-03C	29-Aug-18	H-3		<	156	
MW-03C	04-Dec-18	MN-54		<	1.7	
MW-03C	04-Dec-18	CO-58		<	1.2	
MW-03C	04-Dec-18	FE-59		<	5.8	
MW-03C	04-Dec-18	CO-60		<	3.1	
MW-03C	04-Dec-18	ZN-65		<	3.4	
MW-03C	04-Dec-18	ZR-NB-95		<	2.2	
MW-03C	04-Dec-18	I-131		<	0.264	
MW-03C	04-Dec-18	CS-134		<	2.8	
MW-03C	04-Dec-18	CS-137		<	3.8	
MW-03C	04-Dec-18	BA-LA-140		<	3.3	
MW-03C	04-Dec-18	H-3		<	153	
MW-05C	26-Feb-18	MN-54		<	2.5	
MW-05C	26-Feb-18	CO-58		<	1	
MW-05C	26-Feb-18	FE-59		<	3.1	
MW-05C	26-Feb-18	CO-60		<	2.4	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-05C	26-Feb-18	ZN-65		<	3.9	
MW-05C	26-Feb-18	ZR-NB-95		<	2.5	
MW-05C	26-Feb-18	I-131		<	0.32	
MW-05C	26-Feb-18	CS-134		<	2.6	
MW-05C	26-Feb-18	CS-137		<	3.2	
MW-05C	26-Feb-18	BA-LA-140		<	2.2	
MW-05C	26-Feb-18	H-3		<	155	
MW-05C	02-May-18	MN-54		<	2.9	
MW-05C	02-May-18	CO-58		<	1.4	
MW-05C	02-May-18	FE-59		<	2.9	
MW-05C	02-May-18	CO-60		<	2.7	
MW-05C	02-May-18	ZN-65		<	2.6	
MW-05C	02-May-18	ZR-NB-95		<	3	
MW-05C	02-May-18	I-131		<	0.286	
MW-05C	02-May-18	CS-134		<	2.9	
MW-05C	02-May-18	CS-137		<	1.6	
MW-05C	02-May-18	BA-LA-140		<	3.1	
MW-05C	02-May-18	H-3		<	156	
MW-05C	29-Aug-18	MN-54		<	3.4	
MW-05C	29-Aug-18	CO-58		<	3.4	
MW-05C	29-Aug-18	FE-59		<	7.9	
MW-05C	29-Aug-18	CO-60		<	3.1	
MW-05C	29-Aug-18	ZN-65		<	4.4	
MW-05C	29-Aug-18	ZR-NB-95		<	2.8	
MW-05C	29-Aug-18	I-131		<	0.448	
MW-05C	29-Aug-18	CS-134		<	4.4	
MW-05C	29-Aug-18	CS-137		<	4.1	
MW-05C	29-Aug-18	BA-LA-140		<	3.4	
MW-05C	29-Aug-18	H-3		<	148	
MW-05C	04-Dec-18	MN-54		<	4	
MW-05C	04-Dec-18	CO-58		<	4.7	
MW-05C	04-Dec-18	FE-59		<	6.9	
MW-05C	04-Dec-18	CO-60		<	2.6	
MW-05C	04-Dec-18	ZN-65		<	3.8	
MW-05C	04-Dec-18	ZR-NB-95		<	4.5	
MW-05C	04-Dec-18	I-131		<	0.268	
MW-05C	04-Dec-18	CS-134		<	4.9	
MW-05C	04-Dec-18	CS-137		<	2.8	
MW-05C	04-Dec-18	BA-LA-140		<	2.5	
MW-05C	04-Dec-18	H-3		<	153	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-11A	26-Feb-18	MN-54		<	2.7	
MW-11A	26-Feb-18	MN-54		<	2.5	
MW-11A	26-Feb-18	CO-58		<	1.9	
MW-11A	26-Feb-18	CO-58		<	2.2	
MW-11A	26-Feb-18	FE-59		<	4.1	
MW-11A	26-Feb-18	FE-59		<	3.7	
MW-11A	26-Feb-18	CO-60		<	2.1	
MW-11A	26-Feb-18	CO-60		<	2.5	
MW-11A	26-Feb-18	ZN-65		<	2	
MW-11A	26-Feb-18	ZN-65		<	4.3	
MW-11A	26-Feb-18	ZR-NB-95		<	2.3	
MW-11A	26-Feb-18	ZR-NB-95		<	1.9	
MW-11A	26-Feb-18	I-131		<	0.466	
MW-11A	26-Feb-18	I-131		<	0.405	
MW-11A	26-Feb-18	CS-134		<	3.1	
MW-11A	26-Feb-18	CS-134		<	3.6	
MW-11A	26-Feb-18	CS-137		<	3.2	
MW-11A	26-Feb-18	CS-137		<	2.1	
MW-11A	26-Feb-18	BA-LA-140		<	2.5	
MW-11A	26-Feb-18	BA-LA-140		<	3.3	
MW-11A	26-Feb-18	H-3		<	155	
MW-11A	26-Feb-18	H-3		<	155	
MW-11A	02-May-18	MN-54		<	1.8	
MW-11A	02-May-18	CO-58		<	2.4	
MW-11A	02-May-18	FE-59		<	3.4	
MW-11A	02-May-18	CO-60		<	1.6	
MW-11A	02-May-18	ZN-65		<	4.3	
MW-11A	02-May-18	ZR-NB-95		<	1.6	
MW-11A	02-May-18	I-131		<	0.497	
MW-11A	02-May-18	CS-134		<	2.9	
MW-11A	02-May-18	CS-137		<	2.8	
MW-11A	02-May-18	BA-LA-140		<	2.6	
MW-11A	02-May-18	H-3		<	156	
MW-11A	29-Aug-18	MN-54		<	1.9	
MW-11A	29-Aug-18	CO-58		<	2.5	
MW-11A	29-Aug-18	FE-59		<	4.2	
MW-11A	29-Aug-18	CO-60		<	2.9	
MW-11A	29-Aug-18	ZN-65		<	4	
MW-11A	29-Aug-18	ZR-NB-95		<	2.7	
MW-11A	29-Aug-18	I-131		<	0.453	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-11A	29-Aug-18	CS-134		<	3.7	
MW-11A	29-Aug-18	CS-137		<	4.2	
MW-11A	29-Aug-18	BA-LA-140		<	1.7	
MW-11A	29-Aug-18	H-3		<	156	
MW-11A	04-Dec-18	MN-54		<	3	
MW-11A	04-Dec-18	CO-58		<	1.2	
MW-11A	04-Dec-18	FE-59		<	4.7	
MW-11A	04-Dec-18	CO-60		<	1.2	
MW-11A	04-Dec-18	ZN-65		<	4.1	
MW-11A	04-Dec-18	ZR-NB-95		<	2.1	
MW-11A	04-Dec-18	I-131		<	0.255	
MW-11A	04-Dec-18	CS-134		<	3.2	
MW-11A	04-Dec-18	CS-137		<	2.4	
MW-11A	04-Dec-18	BA-LA-140		<	1.9	
MW-11A	04-Dec-18	H-3		<	153	
MW-11B	26-Feb-18	MN-54		<	4.6	
MW-11B	26-Feb-18	CO-58		<	4	
MW-11B	26-Feb-18	FE-59		<	5.7	
MW-11B	26-Feb-18	CO-60		<	2.7	
MW-11B	26-Feb-18	ZN-65		<	8.8	
MW-11B	26-Feb-18	ZR-NB-95		<	3.3	
MW-11B	26-Feb-18	I-131		<	0.383	
MW-11B	26-Feb-18	CS-134		<	4.9	
MW-11B	26-Feb-18	CS-137		<	3.6	
MW-11B	26-Feb-18	BA-LA-140		<	2.5	
MW-11B	26-Feb-18	H-3		<	155	
MW-11B	02-May-18	MN-54		<	3.9	
MW-11B	02-May-18	CO-58		<	2.9	
MW-11B	02-May-18	FE-59		<	6.2	
MW-11B	02-May-18	CO-60		<	2.3	
MW-11B	02-May-18	ZN-65		<	5.1	
MW-11B	02-May-18	ZR-NB-95		<	3.4	
MW-11B	02-May-18	I-131		<	0.408	
MW-11B	02-May-18	CS-134		<	4.3	
MW-11B	02-May-18	CS-137		<	2.8	
MW-11B	02-May-18	BA-LA-140		<	2.6	
MW-11B	02-May-18	H-3		<	156	
MW-11B	29-Aug-18	MN-54		<	3.5	
MW-11B	29-Aug-18	CO-58		<	1.8	
MW-11B	29-Aug-18	FE-59		<	5.4	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-11B	29-Aug-18	CO-60		<	2.4	
MW-11B	29-Aug-18	ZN-65		<	4.7	
MW-11B	29-Aug-18	ZR-NB-95		<	4	
MW-11B	29-Aug-18	I-131		<	0.47	
MW-11B	29-Aug-18	CS-134		<	4.1	
MW-11B	29-Aug-18	CS-137		<	2.6	
MW-11B	29-Aug-18	BA-LA-140		<	3.7	
MW-11B	29-Aug-18	H-3		<	156	
MW-11B	04-Dec-18	MN-54		<	3.6	
MW-11B	04-Dec-18	MN-54		<	2.2	
MW-11B	04-Dec-18	CO-58		<	3.1	
MW-11B	04-Dec-18	CO-58		<	4	
MW-11B	04-Dec-18	FE-59		<	8.6	
MW-11B	04-Dec-18	FE-59		<	5.2	
MW-11B	04-Dec-18	CO-60		<	3.2	
MW-11B	04-Dec-18	CO-60		<	3.3	
MW-11B	04-Dec-18	ZN-65		<	5.1	
MW-11B	04-Dec-18	ZN-65		<	4.7	
MW-11B	04-Dec-18	ZR-NB-95		<	5	
MW-11B	04-Dec-18	ZR-NB-95		<	3.7	
MW-11B	04-Dec-18	I-131		<	0.215	
MW-11B	04-Dec-18	I-131		<	0.482	
MW-11B	04-Dec-18	CS-134		<	4.6	
MW-11B	04-Dec-18	CS-134		<	5.1	
MW-11B	04-Dec-18	CS-137		<	2	
MW-11B	04-Dec-18	CS-137		<	4.5	
MW-11B	04-Dec-18	BA-LA-140		<	3.2	
MW-11B	04-Dec-18	BA-LA-140		<	4.3	
MW-11B	04-Dec-18	H-3		<	153	
MW-11B	04-Dec-18	H-3		<	153	
MW-12A	26-Feb-18	MN-54		<	2.1	
MW-12A	26-Feb-18	CO-58		<	2	
MW-12A	26-Feb-18	FE-59		<	6.6	
MW-12A	26-Feb-18	CO-60		<	2.9	
MW-12A	26-Feb-18	ZN-65		<	6.8	
MW-12A	26-Feb-18	ZR-NB-95		<	3.7	
MW-12A	26-Feb-18	I-131		<	0.227	
MW-12A	26-Feb-18	CS-134		<	3	
MW-12A	26-Feb-18	CS-137		<	3.2	
MW-12A	26-Feb-18	BA-LA-140		<	2.5	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-12A	26-Feb-18	H-3		<	155	
MW-12A	02-May-18	MN-54		<	2.9	
MW-12A	02-May-18	CO-58		<	2.5	
MW-12A	02-May-18	FE-59		<	4	
MW-12A	02-May-18	CO-60		<	2.1	
MW-12A	02-May-18	ZN-65		<	3.2	
MW-12A	02-May-18	ZR-NB-95		<	2.5	
MW-12A	02-May-18	I-131		<	0.387	
MW-12A	02-May-18	CS-134		<	2.9	
MW-12A	02-May-18	CS-137		<	4.2	
MW-12A	02-May-18	BA-LA-140		<	2.8	
MW-12A	02-May-18	H-3		<	156	
MW-12A	29-Aug-18	MN-54		<	3.3	
MW-12A	29-Aug-18	CO-58		<	1.6	
MW-12A	29-Aug-18	FE-59		<	4.6	
MW-12A	29-Aug-18	CO-60		<	2.4	
MW-12A	29-Aug-18	ZN-65		<	5.2	
MW-12A	29-Aug-18	ZR-NB-95		<	2.1	
MW-12A	29-Aug-18	I-131		<	0.478	
MW-12A	29-Aug-18	CS-134		<	3.8	
MW-12A	29-Aug-18	CS-137		<	3.4	
MW-12A	29-Aug-18	BA-LA-140		<	4	
MW-12A	29-Aug-18	H-3	158	+/-	79	
MW-12A	04-Dec-18	MN-54		<	4	
MW-12A	04-Dec-18	CO-58		<	2.4	
MW-12A	04-Dec-18	FE-59		<	4.9	
MW-12A	04-Dec-18	CO-60		<	4.4	
MW-12A	04-Dec-18	ZN-65		<	2.1	
MW-12A	04-Dec-18	ZR-NB-95		<	3.7	
MW-12A	04-Dec-18	I-131		<	0.247	
MW-12A	04-Dec-18	CS-134		<	4.6	
MW-12A	04-Dec-18	CS-137		<	5.8	
MW-12A	04-Dec-18	BA-LA-140		<	3.9	
MW-12A	04-Dec-18	H-3		<	153	
MW-12B	26-Feb-18	MN-54		<	2.8	
MW-12B	26-Feb-18	CO-58		<	2.1	
MW-12B	26-Feb-18	FE-59		<	3.9	
MW-12B	26-Feb-18	CO-60		<	2.6	
MW-12B	26-Feb-18	ZN-65		<	3.4	
MW-12B	26-Feb-18	ZR-NB-95		<	2	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-12B	26-Feb-18	I-131		<	0.202	
MW-12B	26-Feb-18	CS-134		<	3.6	
MW-12B	26-Feb-18	CS-137		<	3.3	
MW-12B	26-Feb-18	BA-LA-140		<	1.3	
MW-12B	26-Feb-18	H-3		<	156	
MW-12B	02-May-18	MN-54		<	2.4	
MW-12B	02-May-18	CO-58		<	2	
MW-12B	02-May-18	FE-59		<	3.5	
MW-12B	02-May-18	CO-60		<	1.1	
MW-12B	02-May-18	ZN-65		<	3.5	
MW-12B	02-May-18	ZR-NB-95		<	2.2	
MW-12B	02-May-18	I-131		<	0.475	
MW-12B	02-May-18	CS-134		<	2.6	
MW-12B	02-May-18	CS-137		<	2.3	
MW-12B	02-May-18	BA-LA-140		<	1.7	
MW-12B	02-May-18	H-3		<	156	
MW-12B	29-Aug-18	MN-54		<	2.8	
MW-12B	29-Aug-18	CO-58		<	2.7	
MW-12B	29-Aug-18	FE-59		<	5.9	
MW-12B	29-Aug-18	CO-60		<	3.4	
MW-12B	29-Aug-18	ZN-65		<	4.9	
MW-12B	29-Aug-18	ZR-NB-95		<	3	
MW-12B	29-Aug-18	I-131		<	0.474	
MW-12B	29-Aug-18	CS-134		<	3.2	
MW-12B	29-Aug-18	CS-137		<	2.8	
MW-12B	29-Aug-18	BA-LA-140		<	1.5	
MW-12B	29-Aug-18	H-3		<	148	
MW-12B	04-Dec-18	MN-54		<	2.5	
MW-12B	04-Dec-18	CO-58		<	2.9	
MW-12B	04-Dec-18	FE-59		<	4.9	
MW-12B	04-Dec-18	CO-60		<	2.7	
MW-12B	04-Dec-18	ZN-65		<	4.9	
MW-12B	04-Dec-18	ZR-NB-95		<	2.8	
MW-12B	04-Dec-18	I-131		<	0.259	
MW-12B	04-Dec-18	CS-134		<	3.7	
MW-12B	04-Dec-18	CS-137		<	4.1	
MW-12B	04-Dec-18	BA-LA-140		<	3.9	
MW-12B	04-Dec-18	H-3		<	153	
MW-13	26-Feb-18	MN-54		<	2.9	
MW-13	26-Feb-18	CO-58		<	3.2	



**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-13	26-Feb-18	FE-59		<	4.3	
MW-13	26-Feb-18	CO-60		<	2.3	
MW-13	26-Feb-18	ZN-65		<	5	
MW-13	26-Feb-18	ZR-NB-95		<	2.2	
MW-13	26-Feb-18	I-131		<	0.353	
MW-13	26-Feb-18	CS-134		<	3.1	
MW-13	26-Feb-18	CS-137		<	2.7	
MW-13	26-Feb-18	BA-LA-140		<	2.3	
MW-13	26-Feb-18	H-3		<	156	
MW-13	02-May-18	MN-54		<	4.2	
MW-13	02-May-18	MN-54		<	3.2	
MW-13	02-May-18	CO-58		<	3	
MW-13	02-May-18	CO-58		<	3.5	
MW-13	02-May-18	FE-59		<	8.1	
MW-13	02-May-18	FE-59		<	5.5	
MW-13	02-May-18	CO-60		<	2	
MW-13	02-May-18	CO-60		<	3.8	
MW-13	02-May-18	ZN-65		<	5.5	
MW-13	02-May-18	ZN-65		<	2.3	
MW-13	02-May-18	ZR-NB-95		<	1.9	
MW-13	02-May-18	ZR-NB-95		<	4.4	
MW-13	02-May-18	I-131		<	0.423	
MW-13	02-May-18	I-131		<	0.433	
MW-13	02-May-18	CS-134		<	3.1	
MW-13	02-May-18	CS-134		<	4.8	
MW-13	02-May-18	CS-137		<	3.9	
MW-13	02-May-18	CS-137		<	4.5	
MW-13	02-May-18	BA-LA-140		<	4.5	
MW-13	02-May-18	BA-LA-140		<	3.6	
MW-13	02-May-18	H-3		<	156	
MW-13	02-May-18	H-3		<	156	
MW-13	29-Aug-18	MN-54		<	3.9	
MW-13	29-Aug-18	CO-58		<	2.6	
MW-13	29-Aug-18	FE-59		<	6.9	
MW-13	29-Aug-18	CO-60		<	1.9	
MW-13	29-Aug-18	ZN-65		<	5.1	
MW-13	29-Aug-18	ZR-NB-95		<	2.8	
MW-13	29-Aug-18	I-131		<	0.342	
MW-13	29-Aug-18	CS-134		<	4.3	
MW-13	29-Aug-18	CS-137		<	4.2	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-13	29-Aug-18	BA-LA-140		<	1.9	
MW-13	29-Aug-18	H-3		<	148	
MW-13	04-Dec-18	MN-54		<	2	
MW-13	04-Dec-18	CO-58		<	2.9	
MW-13	04-Dec-18	FE-59		<	5.2	
MW-13	04-Dec-18	CO-60		<	2.3	
MW-13	04-Dec-18	ZN-65		<	2.7	
MW-13	04-Dec-18	ZR-NB-95		<	3.8	
MW-13	04-Dec-18	I-131		<	0.413	
MW-13	04-Dec-18	CS-134		<	2.9	
MW-13	04-Dec-18	CS-137		<	3.9	
MW-13	04-Dec-18	BA-LA-140		<	3.7	
MW-13	04-Dec-18	H-3		<	153	
MW-14	26-Feb-18	MN-54		<	2.6	
MW-14	26-Feb-18	CO-58		<	1.3	
MW-14	26-Feb-18	FE-59		<	2.5	
MW-14	26-Feb-18	CO-60		<	3	
MW-14	26-Feb-18	ZN-65		<	3.6	
MW-14	26-Feb-18	ZR-NB-95		<	3.1	
MW-14	26-Feb-18	I-131		<	0.346	
MW-14	26-Feb-18	CS-134		<	2.8	
MW-14	26-Feb-18	CS-137		<	3	
MW-14	26-Feb-18	BA-LA-140		<	2.9	
MW-14	26-Feb-18	H-3		<	156	
MW-14	02-May-18	MN-54		<	3.6	
MW-14	02-May-18	CO-58		<	2.1	
MW-14	02-May-18	FE-59		<	4.6	
MW-14	02-May-18	CO-60		<	1.4	
MW-14	02-May-18	ZN-65		<	2.5	
MW-14	02-May-18	ZR-NB-95		<	2.9	
MW-14	02-May-18	I-131		<	0.46	
MW-14	02-May-18	CS-134		<	3.7	
MW-14	02-May-18	CS-137		<	3.9	
MW-14	02-May-18	BA-LA-140		<	3.1	
MW-14	02-May-18	H-3		<	156	
MW-14	29-Aug-18	MN-54		<	3.3	
MW-14	29-Aug-18	CO-58		<	2.7	
MW-14	29-Aug-18	FE-59		<	6.2	
MW-14	29-Aug-18	CO-60		<	2.1	
MW-14	29-Aug-18	ZN-65		<	5.9	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-14	29-Aug-18	ZR-NB-95		<	4.9	
MW-14	29-Aug-18	I-131		<	0.42	
MW-14	29-Aug-18	CS-134		<	3.7	
MW-14	29-Aug-18	CS-137		<	2.8	
MW-14	29-Aug-18	BA-LA-140		<	3	
MW-14	29-Aug-18	H-3		<	148	
MW-14	04-Dec-18	MN-54		<	2.2	
MW-14	04-Dec-18	CO-58		<	3.5	
MW-14	04-Dec-18	FE-59		<	10.8	
MW-14	04-Dec-18	CO-60		<	3.5	
MW-14	04-Dec-18	ZN-65		<	3	
MW-14	04-Dec-18	ZR-NB-95		<	3.7	
MW-14	04-Dec-18	I-131		<	0.338	
MW-14	04-Dec-18	CS-134		<	3.9	
MW-14	04-Dec-18	CS-137		<	3.6	
MW-14	04-Dec-18	BA-LA-140		<	4.9	
MW-14	04-Dec-18	H-3		<	153	
MW-15	26-Feb-18	MN-54		<	2.1	
MW-15	26-Feb-18	CO-58		<	2.1	
MW-15	26-Feb-18	FE-59		<	6.1	
MW-15	26-Feb-18	CO-60		<	3	
MW-15	26-Feb-18	ZN-65		<	5.9	
MW-15	26-Feb-18	ZR-NB-95		<	3.7	
MW-15	26-Feb-18	I-131		<	0.39	
MW-15	26-Feb-18	CS-134		<	3.8	
MW-15	26-Feb-18	CS-137		<	3.4	
MW-15	26-Feb-18	BA-LA-140		<	1.3	
MW-15	26-Feb-18	H-3	590	+/-	102	
MW-15	02-May-18	MN-54		<	4	
MW-15	02-May-18	CO-58		<	4.6	
MW-15	02-May-18	FE-59		<	8.7	
MW-15	02-May-18	CO-60		<	3.4	
MW-15	02-May-18	ZN-65		<	9	
MW-15	02-May-18	ZR-NB-95		<	3.3	
MW-15	02-May-18	I-131		<	0.46	
MW-15	02-May-18	CS-134		<	4.5	
MW-15	02-May-18	CS-137		<	2.7	
MW-15	02-May-18	BA-LA-140		<	3.2	
MW-15	02-May-18	H-3	352	+/-	109	
MW-15	29-Aug-18	MN-54		<	2	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-15	29-Aug-18	CO-58		<	2.2	
MW-15	29-Aug-18	FE-59		<	5.6	
MW-15	29-Aug-18	CO-60		<	1.4	
MW-15	29-Aug-18	ZN-65		<	5.1	
MW-15	29-Aug-18	ZR-NB-95		<	2.7	
MW-15	29-Aug-18	I-131		<	0.359	
MW-15	29-Aug-18	CS-134		<	3.1	
MW-15	29-Aug-18	CS-137		<	2.5	
MW-15	29-Aug-18	BA-LA-140		<	2.3	
MW-15	29-Aug-18	H-3	256	+/-	84	
MW-15	04-Dec-18	MN-54		<	2.9	
MW-15	04-Dec-18	CO-58		<	3.8	
MW-15	04-Dec-18	FE-59		<	6.5	
MW-15	04-Dec-18	CO-60		<	2.1	
MW-15	04-Dec-18	ZN-65		<	2.7	
MW-15	04-Dec-18	ZR-NB-95		<	4.3	
MW-15	04-Dec-18	I-131		<	0.442	
MW-15	04-Dec-18	CS-134		<	3.5	
MW-15	04-Dec-18	CS-137		<	3.6	
MW-15	04-Dec-18	BA-LA-140		<	3.8	
MW-15	04-Dec-18	H-3	221	+/-	83	
MW-16	26-Feb-18	MN-54		<	2.6	
MW-16	26-Feb-18	CO-58		<	2.7	
MW-16	26-Feb-18	FE-59		<	5.2	
MW-16	26-Feb-18	CO-60		<	2.3	
MW-16	26-Feb-18	ZN-65		<	2.9	
MW-16	26-Feb-18	ZR-NB-95		<	1.9	
MW-16	26-Feb-18	I-131		<	0.495	
MW-16	26-Feb-18	CS-134		<	2.6	
MW-16	26-Feb-18	CS-137		<	2.1	
MW-16	26-Feb-18	BA-LA-140		<	2.5	
MW-16	26-Feb-18	H-3		<	156	
MW-16	02-May-18	MN-54		<	2.9	
MW-16	02-May-18	CO-58		<	2.9	
MW-16	02-May-18	FE-59		<	3.1	
MW-16	02-May-18	CO-60		<	2.3	
MW-16	02-May-18	ZN-65		<	2.7	
MW-16	02-May-18	ZR-NB-95		<	3.5	
MW-16	02-May-18	I-131		<	0.386	
MW-16	02-May-18	CS-134		<	2.8	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-16	02-May-18	CS-137		<	2.6	
MW-16	02-May-18	BA-LA-140		<	2.8	
MW-16	02-May-18	H-3		<	156	
MW-16	29-Aug-18	MN-54		<	3.3	
MW-16	29-Aug-18	CO-58		<	2.6	
MW-16	29-Aug-18	FE-59		<	3.2	
MW-16	29-Aug-18	CO-60		<	3.1	
MW-16	29-Aug-18	ZN-65		<	5.7	
MW-16	29-Aug-18	ZR-NB-95		<	4.5	
MW-16	29-Aug-18	I-131		<	0.359	
MW-16	29-Aug-18	CS-134		<	4.8	
MW-16	29-Aug-18	CS-137		<	3.9	
MW-16	29-Aug-18	BA-LA-140		<	3.2	
MW-16	29-Aug-18	H-3		<	148	
MW-16	04-Dec-18	MN-54		<	3.3	
MW-16	04-Dec-18	CO-58		<	4.6	
MW-16	04-Dec-18	FE-59		<	5.4	
MW-16	04-Dec-18	CO-60		<	2.3	
MW-16	04-Dec-18	ZN-65		<	4.9	
MW-16	04-Dec-18	ZR-NB-95		<	4.2	
MW-16	04-Dec-18	I-131		<	0.304	
MW-16	04-Dec-18	CS-134		<	3.5	
MW-16	04-Dec-18	CS-137		<	3	
MW-16	04-Dec-18	BA-LA-140		<	5.1	
MW-16	04-Dec-18	H-3		<	153	
MW-17	26-Feb-18	MN-54		<	3.1	
MW-17	26-Feb-18	CO-58		<	3.2	
MW-17	26-Feb-18	FE-59		<	4.4	
MW-17	26-Feb-18	CO-60		<	2.7	
MW-17	26-Feb-18	ZN-65		<	2.7	
MW-17	26-Feb-18	ZR-NB-95		<	3.6	
MW-17	26-Feb-18	I-131		<	0.342	
MW-17	26-Feb-18	CS-134		<	3.8	
MW-17	26-Feb-18	CS-137		<	2.9	
MW-17	26-Feb-18	BA-LA-140		<	1.5	
MW-17	26-Feb-18	H-3	267	+/-	87	
MW-17	02-May-18	MN-54		<	2.6	
MW-17	02-May-18	CO-58		<	0.9	
MW-17	02-May-18	FE-59		<	4.3	
MW-17	02-May-18	CO-60		<	3	

**Onsite Groundwater Results  
Concentration (pCi/L)**

LOCATION	DATE	NUCLIDE	ACTIVITY	SIGN	ERROR	NOTE
MW-17	02-May-18	ZN-65		<	4.8	
MW-17	02-May-18	ZR-NB-95		<	1.6	
MW-17	02-May-18	I-131		<	0.345	
MW-17	02-May-18	CS-134		<	3.1	
MW-17	02-May-18	CS-137		<	3.6	
MW-17	02-May-18	BA-LA-140		<	2.9	
MW-17	02-May-18	H-3		<	156	
MW-17	29-Aug-18	MN-54		<	3.6	
MW-17	29-Aug-18	CO-58		<	2.8	
MW-17	29-Aug-18	FE-59		<	3.1	
MW-17	29-Aug-18	CO-60		<	1.4	
MW-17	29-Aug-18	ZN-65		<	3.9	
MW-17	29-Aug-18	ZR-NB-95		<	3.8	
MW-17	29-Aug-18	I-131		<	0.356	
MW-17	29-Aug-18	CS-134		<	3.4	
MW-17	29-Aug-18	CS-137		<	3	
MW-17	29-Aug-18	BA-LA-140		<	5.9	
MW-17	29-Aug-18	H-3		<	148	
MW-17	04-Dec-18	MN-54		<	3.5	
MW-17	04-Dec-18	CO-58		<	2.7	
MW-17	04-Dec-18	FE-59		<	5.1	
MW-17	04-Dec-18	CO-60		<	1.4	
MW-17	04-Dec-18	ZN-65		<	2.9	
MW-17	04-Dec-18	ZR-NB-95		<	2.9	
MW-17	04-Dec-18	I-131		<	0.328	
MW-17	04-Dec-18	CS-134		<	4.2	
MW-17	04-Dec-18	CS-137		<	3.1	
MW-17	04-Dec-18	BA-LA-140		<	3.2	
MW-17	04-Dec-18	H-3		<	153	

**ENCLOSURES TO WCGS**  
**ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT**

Enclosure I contains the *Offsite Dose Calculation Manual*, AP 07B-003, Revision 9

Enclosure II contains the *Offsite Dose Calculation Manual (Radiological Environmental Monitoring Program)*, AP 07B-004, Revision 22

Enclosure III contains the *Solid Radwaste Process Control Program*, AP 31A-100, Revision 8 & 9 (both revisions included as revision 9 came out late in 2018)

**Wolf Creek Nuclear Operating Corporation  
Procedure, AP 07B-003, Revision 9,  
“Offsite Dose Calculation Manual”**





AP 07B-003

OFFSITE DOSE CALCULATION MANUAL

Responsible Manager

MANAGER CHEMISTRY

Revision Number	9
Use Category	Information
Administrative Controls Procedure	Yes
Management Oversight Evolution	No
Program Number	07B

DC12 03/29/2018

## TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1.0	PURPOSE	2
2.0	SCOPE	2
3.0	REFERENCES AND COMMITMENTS	2
4.0	DEFINITIONS	3
5.0	RESPONSIBILITIES	6
6.0	PROCEDURE	7
6.1	Revision Of The ODCM	7
6.2	ODCM Submittal To NRC	8
7.0	RECORDS	8
8.0	FORMS	8
ATTACHMENT A	OFFSITE DOSE CALCULATION MANUAL	9

**1.0 PURPOSE**

- 1.1 This procedure contains the Offsite Dose Calculation Manual (ODCM) and the requirements for revision and submittal to the NRC.
- 1.2 This procedure is written in accordance with and satisfies commitments to Regulatory Guide 1.21 Rev. 1 and Regulatory Guide 1.109 Rev. 1. [3.2.1, 3.2.2]

**2.0 SCOPE**

- 2.1 This procedure partially fulfills the requirements of Technical Specifications: 3.3.6 Containment Purge Isolation Instrumentation; 3.3.7 Control Room Emergency Ventilation System Actuation Instrumentation; 3.3.8 Emergency Exhaust System (EES) Actuation Instrumentation; 5.5.2 Primary Coolant Sources Outside Containment; 5.6.3 Radioactive Effluent Release Report; 5.5.1 Offsite Dose Calculation Manual; and 5.5.4 Radioactive Effluent Controls Program.
- 2.2 Requirements for the Radiological Environmental Monitoring Program have been moved to AP 07B-004.

**3.0 REFERENCES AND COMMITMENTS****3.1 References**

- 3.1.1 WCGS Technical Specifications
- 3.1.2 NUREG-0133, Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants
- 3.1.3 AP 07B-004, OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)
- 3.1.4 PIR 98-0112, Revising the ODCM with an OTSC
- 3.1.5 Technical Requirements Manual
- 3.1.6 NEI Letters 06-00288, 06-00331, 06-00332
- 3.1.7 Regulatory Guide 1.21, Revision 2
- 3.1.8 CR 29301, "Document Estimates for Tritium Release from Auxiliary Boiler"
- 3.1.9 CR 36059, "EPRI and NEI C-14 Training Workshop"
- 3.1.10 CR 28094, "ODCM Does Not Fully Implement Regulatory Guide 1.21"
- 3.1.11 CR 48258, "ODCM Terminology: Operable/Functional Usage"

- 3.1.12 PIR 2002-0975, "ODCM Revision Process Inconsistencies"
- 3.1.13 CR 47483, "Ni-63 in Liquid Effluents: OE 34998"
- 3.1.14 Wolf Creek Updated Safety Analysis Report (USAR)  
**3/18**

### **3.2 Commitments**

- 3.2.1 Regulatory Guide 1.21, Revision 1 "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants"
- 3.2.2 Regulatory Guide 1.109, Revision 1, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part50, Appendix I

### **4.0 DEFINITIONS**

#### **NOTE**

**The defined terms of this section appear in capitalized type and are applicable throughout the ODCM.**

- 4.1 **ACTIONS:** Shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times. **3/18**
- 4.2 **CALENDAR MONTH:** The period of time from the beginning of the month to the end of the month.
- 4.3 **CHANNEL CALIBRATION:** Shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps. **3/18**

- 4.4 CHANNEL CHECK: Shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter. **3/18**
- 4.5 CHANNEL OPERATIONAL TEST (COT): Shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping or total channel steps. **3/18**
- 4.6 DOSE EQUIVALENT I-131: Shall be that concentration of I-131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. **3/18**
- 4.7 FUNCTIONAL-FUNCTIONALITY: An attribute of an SSC not controlled by TSs. An SSC is FUNCTIONAL or has FUNCTIONALITY when it is capable of performing its specified function, as set forth in the current licensing basis. Functionality does not apply to TS specified safety functions, but does apply to the ability of non-TS SSCs to perform other specified functions that have a necessary support function. **3/18**
- 4.8 MEMBER OF THE PUBLIC (10 CFR 20): Means any individual except when that individual is receiving an occupational dose. **3/18**
- 4.9 MEMBER OF THE PUBLIC (40 CFR 190): Means any individual that can receive a radiation dose in the general environment, whether he may or may not also be exposed to radiation in an occupation associated with a nuclear fuel cycle. However, an individual is not considered a member the public during any period in which the individual is engaged in carrying out any operation which is part of a nuclear fuel cycle. **3/18**
- 4.10 PROCESS CONTROL PROGRAM (PCP): Shall contain the current formula, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radioactive wastes, based on demonstrated processing of actual or simulated wet solid wastes, will be accomplished in such a way as to assure compliance with 10 CFR Part 20, 10 CFR Part 71, and Federal & State regulations and other requirements governing the disposal for the radioactive waste.

- 4.11 PURGE/PURGING: The controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration, or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.
- 4.12 RATED THERMAL POWER (RTP): RTP shall be a total reactor core heat transfer rate to the reactor coolant of 3565 MWt. **3/18**
- 4.13 RESTRICTED AREA: 10 CFR 20 defines it as an area, access to which is limited by the licensee for the purpose of protecting individuals against undue risks from exposure to radiation and radioactive materials. Restricted area does not include areas used as residential quarters, but separate rooms in a residential building may be set apart as a restricted area; per the USAR, the RESTRICTED AREA = EXCLUSION AREA. **3/18**
- 4.14 SOURCE CHECK: Shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.
- 4.15 SITE BOUNDARY: Per the USAR, this is considered the boundary between the UNRESTRICTED and RESTRICTED AREAS for radioactive effluent limits; the SITE BOUNDARY = Exclusion Area Boundary. **3/18**
- 4.16 THERMAL POWER: Shall be the total reactor core heat transfer rate to the reactor coolant. **3/18**
- 4.17 TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT): Shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping, or total channel steps. **3/18**
- 4.18 UNRESTRICTED AREA: Per the USAR, this is the area that begins at the unrestricted/restricted boundary and extends outward. **3/18**
- 4.19 VENTING: The controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is not provided or required during venting. Vent, used in system names, does not imply a venting process.

- 4.20 VENTILATION EXHAUST TREATMENT SYSTEM (NUREG-1301): Shall be any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Features Atmospheric Cleanup Systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components. **3/18**
- 4.21 WASTE GAS HOLDUP SYSTEM (NUREG-1301): Shall be any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System offgases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment. **3/18**
- 4.22 X/Q (Regulatory Guide 1.21, Rev 2): The average atmospheric effluent concentration, X, normalized by release rate, Q, at a distance (or location) in a given downwind direction. Expressed in another way, X/Q, is the concentration (X) of airborne radioactive material (e.g., in units of  $\mu\text{Ci}/\text{m}^3$ ) divided by the release rate (Q) (e.g., in units of  $\mu\text{Ci}/\text{s}$ ) at a specified distance and direction downwind of the release point. **3/18**
- 4.23 X/Q: Wolf Creek Generating Station uses a value of  $2.2\text{E}-06$   $\text{sec}/\text{m}^3$  at the 1200 meter boundary in the north sector. **3/18**

## 5.0 RESPONSIBILITIES

- 5.1 The Manager Chemistry is responsible for the ODCM.

**6.0 PROCEDURE****6.1 Revision Of The ODCM****NOTE**

To comply with Technical Specification 5.5.1, revisions to the ODCM are not permitted via APF 15C-004-04, ON THE SPOT CHANGE form (3.1.4).

- 6.1.1 All revisions to the ODCM are to be submitted through the Manager Chemistry via a document revision request (APF 15C-004-01).
- 6.1.2 The Manager Chemistry shall ensure the Document Revision Request (APF 15C-004-01) package includes the following:
1. Each change shall be identified by markings in the margins of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented. Pursuant to TS 5.5.1, revision bars indicating changes prior to the current reporting period may be removed.
  2. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  3. A determination that the change will maintain the level of Radioactive Effluent Control required by Wolf Creek Technical Specification 5.5.4.g (gaseous effluent), 10 CFR 20.1302 (liquid effluent), 40 CFR Part 190, 10 CFR 50.36A, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose or setpoint calculations.
- 6.1.3 The ODCM revision shall become effective after review and acceptance by the PSRC and the approval of the Plant Manager.



**6.2 ODCM Submittal To NRC**

- 6.2.1 Changes to the ODCM shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made.

**7.0 RECORDS**

- 7.1 The following is a lifetime QA Record:

7.1.1 AP 07B-003, OFFSITE DOSE CALCULATION MANUAL

**8.0 FORMS**

- 8.1 None

ATTACHMENT A  
(Page 1 of 152)

OFFSITE DOSE CALCULATION MANUAL

## Wolf Creek Generating Station



## Offsite Dose Calculation Manual

ATTACHMENT A  
(Page 2 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE OF CONTENTS**

<b>1.0 INTRODUCTION</b>	5
<b>2.0 LIQUID EFFLUENTS</b>	6
2.1 DOSE RATE-COMPLIANCE WITH 10 CFR 20	6
2.2 DOSE-COMPLIANCE WITH 10 CFR 50 APPENDIX I	11
2.3 PROJECTED DOSE	13
2.4 INSTRUMENTATION	14
<b>3.0 GASEOUS EFFLUENTS</b>	28
3.1 DOSE RATE-COMPLIANCE WITH TECHNICAL SPECIFICATION 5.5.4.g	29
3.2 DOSE - COMPLIANCE WITH 10 CFR 50 APPENDIX I	35
3.3 PROJECTED DOSE	43
3.4 INSTRUMENTATION	44
<b>4.0 TOTAL DOSE</b>	60
4.1 REMEDIAL ACTION	60
4.2 SURVEILLANCE REQUIREMENTS	60
<b>5.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM</b>	61
(Contained in AP 07B-004)	
<b>6.0 BASES</b>	61
<b>7.0 REPORTS</b>	67
7.1 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT (contained in AP 07B-004)	67
7.2 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT	68
APPENDIX A: DOSE CONVERSION FACTOR TABLES	71
APPENDIX B: METEOROLOGICAL MODEL	147

ATTACHMENT A  
(Page 3 of 152)

OFFSITE DOSE CALCULATION MANUAL

**LIST OF TABLES**

<u>Table</u>		<u>Page</u>
2-1	RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM	7
2-2	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION	15
2-3	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS	17
3-1	RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM	31
3-2	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION	46
3-3	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS	48
A.1-1	BIOACCUMULATION FACTORS TO BE USED IN THE ABSENCE OF SITE SPECIFIC DATA	72
A.1-2	DOSE FACTORS FOR NOBLE GASES AND DAUGHTERS	73
A.2-1	INHALATION DOSE FACTORS FOR ADULTS	74
A.2-2	INHALATION DOSE FACTORS FOR TEENAGER	76
A.2-3	INHALATION DOSE FACTORS FOR CHILD	78
A.2-4	INHALATION DOSE FACTORS FOR INFANT	80
A.2-5	EXTERNAL DOSE FACTORS FOR STANDING ON CONTAMINATED GROUND	82
A.3-1	INGESTION DOSE FACTORS FOR ADULTS	84
A.3-2	INGESTION DOSE FACTORS FOR TEENAGERS	87
A.3-3	INGESTION DOSE FACTORS FOR CHILD	90
A.3-4	INGESTION DOSE FACTORS FOR INFANT	93
A.3-5	STABLE ELEMENT TRANSFER DATA	96
A.4-1	SITE RELATED DOSE COMMITMENT FACTOR FOR ADULT	97
A.4-2	SITE RELATED DOSE COMMITMENT FACTOR FOR TEEN	100
A.4-3	SITE RELATED DOSE COMMITMENT FACTOR FOR CHILD	103
A.4-4	SITE RELATED DOSE COMMITMENT FACTOR FOR INFANT	106
A.5-1	INHALATION DOSE PARAMETER FOR THE CHILD	109
A.5-2	INHALATION PATHWAY FACTOR FOR ADULT (RI FACTORS)	110
A.5-3	INHALATION PATHWAY FACTOR FOR TEEN (RI FACTORS)	112
A.5-4	INHALATION PATHWAY FACTOR FOR CHILD (RI FACTORS)	114
A.5-5	INHALATION PATHWAY FACTOR FOR INFANT (RI FACTORS)	116
A.5-6	GRASS-COW-MILK PATHWAY FACTOR ADULT (RI FACTORS)	118
A.5-7	GRASS-COW-MILK PATHWAY FACTOR TEEN (RI FACTORS)	120
A.5-8	GRASS-COW-MILK PATHWAY FACTOR CHILD (RI FACTORS)	122
A.5-9	GRASS-COW-MILK PATHWAY FACTOR INFANT (RI FACTORS)	124
A.5-10	GRASS-COW-MEAT PATHWAY FACTOR ADULT (RI FACTORS)	126

ATTACHMENT A  
(Page 4 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**LIST OF TABLES CONTINUED**

<u>Table</u>		<u>Page</u>
A.5-11	GRASS-COW-MEAT PATHWAY FACTOR TEEN (RI FACTORS)	128
A.5-12	GRASS-COW-MEAT PATHWAY FACTOR CHILD (RI FACTORS)	130
A.5-13	VEGETATION PATHWAY FACTOR ADULT (RI FACTORS)	132
A.5-14	VEGETATION PATHWAY FACTOR TEEN (RI FACTORS)	134
A.5-15	VEGETATION PATHWAY FACTOR CHILD (RI FACTORS)	136
A.5-16	GROUND PLANE PATHWAY FACTOR (RI FACTOR)	138
A.5-17	GRASS-GOAT-MILK PATHWAY FACTOR ADULT	139
A.5-18	GRASS-GOAT-MILK PATHWAY FACTOR TEEN	141
A.5-19	GRASS-GOAT-MILK PATHWAY FACTOR CHILD	143
A.5-20	GRASS-GOAT-MILK PATHWAY FACTOR INFANT	145

**LIST OF FIGURES**

<u>Figure</u>		<u>Page</u>
B-1	VERTICAL STANDARD DEVIATION OF MATERIAL IN A PLUME	150
B-2	PLUME TRAVEL DISTANCE VERSUS FRACTION REMAINING IN PLUME	151
B-3	PLUME TRAVEL DISTANCE VERSUS RELATIVE DEPOSITION RATE	152

ATTACHMENT A  
(Page 5 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**1.0 Introduction**

The Offsite Dose Calculation Manual describes the Radioactive Effluent Controls Program. The implementation of this program ensures compliance with the requirements of 10 CFR 50.36, 10 CFR 20.106, 10 CFR 20.1302, 10 CFR 50 Appendix I and 40 CFR 190.

On January 1, 1994, 10 CFR 20.1001-20.2402 was implemented. Wolf Creek maintains the existing level of gaseous effluent control established from specifications in the first implementation of 10 CFR 20.106, now contained in Wolf Creek Technical Specification 5.5.4.g. Compliance with Technical Specification 5.5.4.g has been determined by the NRC to be As Low As Reasonably Achievable (ALARA).

On December 18, 1999 Wolf Creek implemented 10 CFR 20.1302 limits for radioactive liquid effluents. The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREA conforms to 10 times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001-20.2402.

The ODCM describes the methodology and parameters used in the calculation of offsite doses due to radioactive liquid and gaseous effluents. The ODCM contents for calculation of dose are based on "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants (NUREG-0133)," and Regulatory Guide 1.109, Revision 1.

Dose calculations are performed for the limiting age group i.e., Adult age group for the liquid pathway, and the Child age group for gaseous effluent organ doses.

The ODCM provides the limitations on the FUNCTIONALITY of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination. Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified interval.

The ODCM provides descriptions of the information that should be included in the Annual Radioactive Effluent Release Reports.

ATTACHMENT A  
(Page 6 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**2.0 Liquid Effluents****2.1 Concentration - Compliance with 10 CFR 20**

The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS shall be limited to 10 times the limit specified in 10 CFR Part 20, Appendix B, Table 2, Column 2, for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to  $2 \times 10^{-4}$  microCurie/mL total activity. (USAR Chapter 11)

**2.1.1 Remedial Action**

With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, immediately restore the concentration to within the above limits.

**2.1.2 Surveillance Requirements**

To show compliance with this requirement, concentrations of actual liquid effluents will be determined by performing Isotopic Analyses. Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 2-1.

ATTACHMENT A  
(Page 7 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-1**

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

LIQUID RELEASE TYPE	SAMPLE FREQUENCY	PRINCIPAL GAMMA EMMITERS	I-131	DISSOLVED/ ENTRAINED GASES (GAMMA)	GROSS ALPHA AND H-3	Sr-89, Sr-90	Fe-55, Ni-63
<b>1. Batch Tanks (2)</b>							
THB07A&B	P	P (3)	P	M	M Composite (4)	Q Composite (4)	Q Composite (4)
LLD (1)		5E-7	1E-6	1E-5	1E-7 Alpha 1E-5 H-3	5E-8	1E-6
THF04A&B	P	P (3)	P	M	M Composite (4)	Q Composite (4)	Q Composite (4)
LLD (1)		5E-7	1E-6	1E-5	1E-7 Alpha 1E-5 H-3	5E-8	1E-6
<b>2. Continuous Releases (5)</b>							
Steam Generator Blowdown	D(6)	W(3) Composite (4)	W Composite (4)	M	M Composite (4)	Q Composite (4)	Q Composite (4)
LLD(1)		5E-7	1E-6	1E-5	1E-7 Alpha 1E-5 H-3	5E-8	1E-6
Turbine Building Sump	D(6)	W(3) Composite (4)	W Composite (4)	M	M Composite (4)	Q Composite (4)	Q Composite (4)
LLD(1)		5E-7	1E-6	1E-5	1E-7 Alpha 1E-5 H-3	5E-8	1E-6
Waste Water Treatment	D(6)	W(3) Composite (4)	W Composite (4)	M	M Composite (4)	Q Composite (4)	Q Composite (4)
LLD(1)		5E-7	1E-6	1E-5	1E-7 Alpha 1E-5 H-3	5E-8	1E-6
Lime Sludge Pond	D(6)	W(3) Composite (4)	W Composite (4)	M	M Composite (4)	Q Composite (4)	Q Composite (4)
LLD(1)		5E-7	1E-6	1E-5	1E-7 Alpha 1E-5 H-3	5E-8	1E-6

LLD = ( $\mu\text{Ci/ml}$ )

NOTATION    FREQUENCY

S    At least once per 12 hours  
D    At least once per 24 hours  
W    At least once per 7 days  
M    At least once per 31 days  
Q    At least once per 92 days

NOTATION    FREQUENCY

SA    At least once per 184 days  
R    At least once per 18 months  
S/U    Prior to each reactor startup  
N.A.    Not Applicable  
P    Completed prior to each release



ATTACHMENT A  
(Page 8 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-1 (Continued)**

## TABLE NOTATIONS

(1) The LLD is defined, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

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

$$LLD = \frac{4.66 s_b}{E \times V \times 2.22 \times 10^6 \times Y \times \text{Decay}}$$

Eq. 1

Where:

**LLD** = the "a priori" lower limit of detection (microCuries per unit mass or volume)

**s<sub>b</sub>** = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute

$$s_b = \sqrt{B} / LT$$

Eq. 2

Where:

**B** = background sum (counts)

**LT** = live time (minutes)

**E** = the counting efficiency (counts per disintegration)

**V** = the sample size (units of mass or volume)

**2.22x10<sup>6</sup>** = the number of disintegrations per minute per microCurie

**Y** = the fractional radiochemical yield, when applicable

**Decay** = decay factor(s); there are three decay factors that may be appropriate for use depending on the nature of the sample and the half-life of the nuclide; any combination of the three may be used; the factors are as follows:

ATTACHMENT A  
(Page 9 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-1 (Continued)**

## TABLE NOTATIONS

- a) This decay factor corrects for decay from the time of sampling to the start of the analysis.

$$e^{-\lambda t_s}$$

Eq. 3

Where:

 $\Delta t_s$  = decay time = acquisition start time - sample time $\lambda$  = ln2/half-life

- b) This decay factor corrects for decay during the analysis.

$$\frac{1 - e^{-\lambda RT}}{\lambda \times RT}$$

Eq. 4

Where:

 $\lambda$  = ln2/half-life**RT** = real time of counting

- c) This decay factor corrects for decay during sampling.

$$\frac{1 - e^{-\lambda \Delta t_d}}{\lambda \Delta t_d}$$

Eq. 5

Where:

 $\lambda$  = ln2/half-life $\Delta t_d$  = deposition time = (sample time - deposition start time),  
or for effluents only (sample time - midpoint of sample period)**NOTE**

All times used in decay calculations should be in the same units.

Typical values of E, V, Y,  $t_s$ ,  $t_d$  should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

ATTACHMENT A  
(Page 10 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-1 (Continued)**

TABLE NOTATIONS

For very low background counting, the LLD can optionally be calculated as follows:

$$LLD = \frac{2.71 + 4.66 s_b}{E \times V \times 2.22 \times 10^6 \times Y \times \text{Decay}}$$

Eq. 6

(2) A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mixed by a method described in plant procedures to assure representative sampling.

(3) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the annual Radioactive Effluent Release Report. **3/18**

(4) A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released. Prior to analysis, all samples taken for the composite shall be thoroughly mixed in order for the composite samples to be representative of the effluent release.

(5) A continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.

(6) Samples shall be taken at the initiation of effluent flow and at least once per 24 hours thereafter while the release is occurring. To be representative of the liquid effluent, the sample volume shall be proportioned to the effluent stream discharge volume. The ratio of sample volume to effluent discharge volume shall be maintained constant for all samples taken for the composite sample.

ATTACHMENT A  
(Page 11 of 152)

OFFSITE DOSE CALCULATION MANUAL

**2.2 Dose - Compliance With 10 CFR 50 Appendix I**

The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each unit, to UNRESTRICTED AREAS shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ, and
- b. During any calendar year to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

**2.2.1 Remedial Action**

With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits. This Special Report shall also include the results of radiological analyses of the drinking water source, and the radiological impact on finished drinking water supplies with regard to the requirements of 40 CFR Part 141, Clean Drinking Water Act. This requirement of (a.) and (b.) are applicable only if drinking water supply is taken from the receiving body within 3 miles of the plant discharge.

**2.2.2 Surveillance Requirements**

Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined using the following methodology at least once per 31 days.

$$D_r = \sum_i \left( A_{ir} \sum_{\lambda=1}^m \Delta t_{\lambda} C_{i\lambda} F_{\lambda} \right)$$

Eq. 7

Where:

$D_r$  = cumulative dose commitment to the total body or any organ,  $\tau$ , from the liquid effluent for the total time period  $\sum_{\lambda=1}^m \Delta t_{\lambda}$ , in mrem

$\Delta t_{\lambda}$  = the length of the  $\lambda$ th time period over which  $C_{i\lambda}$  and  $F_{\lambda}$  are averaged for all liquid releases, in hours

ATTACHMENT A  
(Page 12 of 152)

OFFSITE DOSE CALCULATION MANUAL

$C_{i\lambda}$  = the average concentration of radionuclide  $i$ , in undiluted liquid effluent flow during time period  $\Delta t_{\lambda}$ , in  $\mu\text{Ci/ml}$

$F_{\lambda}$  = the near field average dilution factor for  $C_{i\lambda}$  during any liquid effluent release; it is calculated as follows:

$$F_{\lambda} = \frac{f}{(f+F)K}$$

Eq. 8

Where:

$f$  = liquid radioactive waste flow (waste water flow)

$F$  = liquid dilution flow, the average dilution flow during release

$K$  = applicable factor; the site dependent value for the mixing effect of the discharge structure; this value is conservatively assumed to be 1 (one) for this section

$A_{i\tau}$  = the site related ingestion dose commitment factor to the total body or any organ,  $\tau$ , for each identified principal gamma and beta emitter in mrem/hr per  $\mu\text{Ci/ml}$ ; see Tables A.4-1 through A.4-4

The limiting age group for liquid dose calculations is the Adult age group.

$$A_{i\tau} = 1.14E5 (U_w / D_w + U_F \times BF_i) DF_i$$

Eq. 9

Where:

$D_w$  = dilution factor from the near field area to the potable water intake for water consumption; for Wolf Creek Generating Station, this factor is 1 (one)

$BF_i$  = bioaccumulation factor for radionuclide  $i$  in fish, in pCi/kg per pCi/l (Table A.1-1 from Regulatory Guide 1.109, Rev. 1)

$DF_i$  = adult dose conversion factor for radionuclide  $i$ , in mrem/pCi (Table A.3-1 from Regulatory Guide 1.109, Rev. 1)

$U_w$  = adult water consumption, 730 l/yr (Regulatory Guide 1.109)

$U_F$  = adult fish consumption, 21 kg/yr (Regulatory Guide 1.109)

$$1.14E5 = \text{Units conversion factor} = \frac{10^6 \text{ pCi}/\mu\text{Ci} \times 10^3 \text{ ml/l}}{8760 \text{ hr/yr}}$$

ATTACHMENT A  
(Page 13 of 152)

## OFFSITE DOSE CALCULATION MANUAL

The dose calculations are based on the actual isotopic analysis of the radioactive liquid effluents, the radioactive liquid effluent flow and the dilution flow.

The above dose calculations utilize NUREG-0133 equations and Regulatory Guide 1.109 tables. For the effluent pathways in use at Wolf Creek, NUREG-0133 and Regulatory Guide 1.109 are equivalent calculations when the 'nuclide transit time to point of exposure', used in Regulatory Guide 1.109, is set to zero. NUREG-0133 calculations are developed and used here for calculation simplification in the event manual calculations are needed. Software currently in use utilizes the equivalent Regulatory Guide 1.109 equations to provide greater software versatility. Equations have been proven equivalent algebraically and numerically.

### **2.3 Projected Dose**

The Liquid Radwaste Treatment System shall be FUNCTIONAL and appropriate portions of the system shall be used to reduce releases of radioactivity when the projected doses due to liquid effluent, from each unit, to UNRESTRICTED AREAS would exceed 0.06 mrem to the whole body or 0.2 mrem to any organ in a 31 day period.

#### **2.3.1 Remedial Action**

With radioactive liquid waste being discharged without treatment and in excess of the above limits and any portion of the Liquid Radwaste Treatment System not in operation, prepare and submit to the Commission within 30 days, a Special Report that includes the following information:

- a. Explanation of why liquid radwaste was being discharged without treatment, identification of any nonfunctional equipment or subsystems, and the reason for the nonfunctionality,
- b. Action(s) taken to restore the nonfunctional equipment to FUNCTIONAL status, and
- c. Summary description of action(s) taken to prevent a recurrence.

#### **2.3.2 Surveillance Requirements**

**2.3.2.1** Doses due to liquid releases from each unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the following methodology when Liquid Radwaste Treatment Systems are not being fully utilized.

ATTACHMENT A  
(Page 14 of 152)

## OFFSITE DOSE CALCULATION MANUAL

$$D_{31} = \left[ \frac{A}{T} \right] \times 31$$

Eq. 10

Where:

**D<sub>31</sub>** = projected 31 day dose

**A** = cumulative dose for previous three calendar months

**T** = number of days that the cumulative dose occurred in A above

**2.3.2.2** The installed Liquid Radwaste Treatment System shall be considered FUNCTIONAL by meeting the requirements of Sections 2.1 and 2.2.

#### **2.4 Instrumentation**

The radioactive liquid effluent monitoring instrumentation channels shown in Table 2-2 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of Section 2.1 are not exceeded. The Alarm/Trip Setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters described in Section 2.4.4.

##### **2.4.1 Remedial Action**

**2.4.1.1** With a radioactive liquid effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above, immediately suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel nonfunctional.

**2.4.1.2** With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels FUNCTIONAL, take the ACTION shown in Table 2-2. Restore the nonfunctional instrumentation to FUNCTIONAL status within the time specified in the ACTION, or explain in the next Annual Radioactive Effluent Release Report why this nonfunctionality was not corrected within the time specified.

##### **2.4.2 Surveillance Requirements**

Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated FUNCTIONAL by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL OPERATIONAL TEST at the frequencies shown in Table 2-3.

ATTACHMENT A  
(Page 15 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-2**

## RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS FUNCTIONAL</u>	<u>ACTION</u>
1. Radioactivity Monitors Providing Alarm and Automatic Termination of Release		
a. Liquid Radwaste Discharge Monitor (HB-RE-18)	1	31
b. Steam Generator Blowdown Discharge Monitor (BM-RE-52)	1	32
c. Turbine Building Drain Monitor (LE-RE-59)	1	32
d. Secondary Liquid Waste System Monitor (HF-RE-45)	1	31
e. Wastewater Treatment System Influent Monitor (HF-RE-95)	1	32
2. Flow Rate Measurement Devices		
a. Liquid Radwaste Discharge Line		
1) Waste Monitor Tank A Discharge Line	1	33
2) Waste Monitor Tank B Discharge Line	1	33
b. Steam Generator Blowdown Discharge Line	1	33
c. Secondary Liquid Waste System Discharge Line		
1) Secondary Liquid Waste Monitor Tank A Discharge Line	1	33
2) Secondary Liquid Waste Monitor Tank B Discharge Line	1	33



ATTACHMENT A  
(Page 16 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-2 (Continued)**

## ACTION STATEMENTS

**Action 31** - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, effluent releases via this pathway may continue for up to 14 days provided that prior to initiating a release:

- a. At least two independent samples are analyzed in accordance with Section 2.1.2, and
- b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge line valving.

Otherwise, suspend release of radioactive effluents via this pathway.

**Action 32** - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are analyzed for principle gamma emitters and I-131 at a lower limit of detection as specified in Table 2-1.

- a. At least once per 12 hours when the specific activity of the secondary coolant is greater than 0.01 microCurie/gram DOSE EQUIVALENT I-131, or
- b. At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microCurie/gram DOSE EQUIVALENT I-131.

**Action 33** - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours during actual releases. Pump performance curves generated in place may be used to estimate flow.

ATTACHMENT A  
(Page 17 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-3**  
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL OPERATIONAL TEST</u>
1. Radioactivity Monitors providing alarm and automatic termination of release				
a. Liquid Radwaste Discharge Monitor (HB-RE-18)	D	P	R(2)	Q(1)
b. Steam Generator Blowdown Discharge Monitor (BM-RE-52)	D	M	R(2)	Q(1)
c. Turbine Building Drain Monitor (LE-RE-59)	D	M	R(2)	Q(1)
d. Secondary Liquid Waste System Monitor (HF-RE-45)	D	P	R(2)	Q(1)
e. Wastewater Treatment System Influent Monitor (HF-RE-95)	D	M	R(2)	Q(1)
2. Flow Rate Measurement Devices				
a. Liquid Radwaste Discharge Line	D(3)	N.A.	R	N.A.
b. Steam Generator Blowdown Discharge Line	D(3)	N.A.	R	N.A.
c. Secondary Liquid Waste System Discharge Line	D(3)	N.A.	R	N.A.

ATTACHMENT A  
(Page 18 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 2-3 (Continued)**

## TABLE NOTATIONS

(1) The CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur as appropriate if any of the following conditions exists:

- a. Instrument indicates measured levels above the Alarm/Trip Setpoint (isolation and alarm), or
- b. Circuit failure (alarm only), or
- c. Instrument indicates a downscale failure (alarm only), or
- d. Instrument controls not set in operate mode (alarm only).

(2) The initial CHANNEL CALIBRATION for each model detector shall be performed using one or more of the reference (gas, liquid and/or solid) standards certified by the National Institute of Standards and Technology (NIST) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NIST. These standards shall permit calibrating the system over its intended range or energy, measurement range, and establish monitor response to solid secondary calibration source(s). For subsequent CHANNEL CALIBRATION, NIST traceable standard (gas, liquid and/or solid) may be used; or a solid source that has been correlated to the detectors initial CHANNEL CALIBRATION that was previously (within 30 days) calibrated by the same geometry and type of source standard traceable to NIST. **3/18**

With vendor concurrence, initial CHANNEL CALIBRATIONS for the same model and type detector are representative of all detectors of the same model and type. **3/18**

Initial detector CHANNEL CALIBRATIONS may be performed by a vendor in place of on-site initial CHANNEL CALIBRATION, providing all of the requirements specified in the ODCM and USAR are met. **3/18**

(3) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

ATTACHMENT A  
(Page 19 of 152)

OFFSITE DOSE CALCULATION MANUAL

### **2.4.3 Liquid Monitor Calibration Methodology**

The five monitors associated with liquid releases are listed below:

<u>Monitor ID</u>	<u>Description</u>
0-BM-RE-52	Steam Generator Blowdown Discharge Monitor
0-LE-RE-59	Turbine Building Drain Monitor
0-HF-RE-45	Secondary Liquid Waste System Monitor
0-HB-RE-18	Liquid Radwaste Discharge Monitor
0-HF-RE-95	Wastewater Treatment System Influent Monitor

Liquid effluent streams are monitored by an NaI(Tl) Detector. The detector operates in a gross counting mode and is gamma sensitive.

Calibration of the liquid monitors shall be performed using at least three standard solutions of Cs-137. The standards shall cover the appropriate range of the detector and have concentrations of approximately  $5 \times 10^{-7}$   $\mu\text{Ci/cc}$ ,  $1 \times 10^{-5}$   $\mu\text{Ci/cc}$ , and  $1 \times 10^{-3}$   $\mu\text{Ci/cc}$ . The standards shall be presented to the detector and the meter reading in counts per minute shall be recorded. A determination of linearity shall be produced using the counts per minute vs. concentration data. **3/18**

### **2.4.4 Liquid Effluent Monitor Setpoints**

The High Alarm/Trip Setpoints for the Liquid Effluent Radiation Monitors are based on 10 times the instantaneous concentration limits of 10 CFR 20, Appendix B, Table 2, Column 2 applied at the boundary of the restricted area. Specifically, the High Alarm Setpoint will correspond to 10 times the 10 CFR Part 20 limits at the boundary of the restricted area. Since the high alarm/trip initiates isolation of the particular system and termination of the release, this setpoint represents assurance that 10 times the instantaneous liquid release limit of 10 CFR Part 20 is not exceeded. Auditable records shall be maintained indicating the actual setpoints used at all times.

ATTACHMENT A  
(Page 20 of 152)

OFFSITE DOSE CALCULATION MANUAL

The following discussion explains the setpoint methodology, which is applied in greater detail in subsequent sections. The calculated Alarm and Trip Action Setpoints for the Liquid Effluent Line Monitors must satisfy the following equation:

$$c \left( \frac{f}{F+f} \right) \leq \text{ECL}$$

Eq. 11

Where:

**ECL** = ten times the liquid Effluent Concentration Limit of 10 CFR 20, which implements Section 2.1 in  $\mu\text{Ci/ml}$ ; for dissolved or entrained noble gases, the concentration shall be limited to  $2 \times 10^{-4} \mu\text{Ci/ml}$  total activity **3/18**

**c** = the setpoint, in  $\mu\text{Ci/ml}$ , of the radioactivity monitor measuring the radioactivity concentration in the effluent line (waste water line) prior to dilution and subsequent release; the setpoint is inversely proportional to the volumetric flow of the effluent line and directly proportional to the volumetric flow of the dilution stream plus the effluent stream; the setpoint represents a value, which if exceeded would result in concentrations exceeding 10 times the limits of 10 CFR 20 in the restricted area

**f** = the effluent pump flow rate (waste water flow rate) as measured at the radiation monitor location, in volume per unit time, but in the same units as F below

**F** = the dilution water flow rate as measured prior to the release point, in volume per unit time

Rearranged, the expression for determining the setpoint on the liquid radwaste effluent line monitor becomes:

$$c \leq \text{ECL} \left( \frac{F+f}{f} \right) (\mu\text{Ci/ml})$$

Eq. 12

If no gamma activity is detected, calculate the monitor setpoint by assigning the available ECL fraction to 10 times the 10 CFR 20 ECL for I-131.

ATTACHMENT A  
(Page 21 of 152)

OFFSITE DOSE CALCULATION MANUAL

#### **2.4.4.1 Continuous Liquid Effluent Monitors**

The three monitors associated with continuous liquid releases are listed below:

<u>Monitor ID</u>	<u>Description</u>
0-BM-RE-52	Steam Generator Blowdown Discharge Monitor
0-LE-RE-59	Turbine Building Drain Monitor
0-HF-RE-95	Waste Water Treatment System Influent Monitor

The Steam Generator Blowdown Discharge Effluent Monitor continuously monitors the Blowdown Discharge Pump Outlet to detect excess radioactivity due to System Demineralizer breakthrough or abnormal Primary to Secondary leakage. The Blowdown Discharge Monitor's High Alarm Setpoint initiates CLOSURE of the Blowdown Isolation Valves and the Blowdown Discharge Valve. Similarly, the High Radiation Alarm on the Turbine Building Drain Monitor and Waste Water Treatment Monitor initiates CLOSURE of the Drain Line Isolation Valves to prevent the release of radioactive effluents.

Monitor setpoints will be conservatively based on I-131, the most restrictive isotope expected to be present. This is particularly appropriate for the Turbine Building Drain Line Monitor since the most probable source is the Secondary Steam System which is expected to have negligible activity unless there is a significant Primary to Secondary leak. Due to changing activities, it will not be possible to select a radionuclide distribution on which to base the monitor setpoint. Additionally, maximum effluent flows and minimum dilution flows will normally be assumed.

The High Alarm/Trip Setpoint will be set to correspond to 10 times the I-131 ECL limit at the boundary of the restricted area from 10 CFR Part 20, Appendix B, Table 2, Column 2. The alert alarm is set one order of magnitude below the High Alarm/Trip Setpoint for release points that have dilution and to the High Alarm value for those without dilution. This High Alarm/Trip Setpoint assures the limits of Section 2.1 are not exceeded at the boundary of the restricted area.

ATTACHMENT A  
(Page 22 of 152)

OFFSITE DOSE CALCULATION MANUAL

The above continuous liquid effluents are not radioactive effluents until activity has been detected by the liquid effluent monitor, a tritium analysis of the secondary system, or a gross beta analysis of the secondary system. At that time, an analysis of the effluent will be made to verify activity in the system effluent. During periods of time when the above liquid effluents are not radioactive, the High Alarm/Trip Setpoint may be set to 1.5 times the background count rate.

The high alarm/trip setpoints for continuous releases are calculated using the following methodology:

$$\text{SETPOINT } (\mu\text{Ci/ml}) = \text{ECL}_{\text{I-131}} \times \frac{\text{F} + \text{f}}{\text{f}} \times \text{AF} \times \text{SF}$$

Eq. 13

Where:

**ECL<sub>I-131</sub>** = 1E-5  $\mu\text{Ci/ml}$  (this value equals 10 times the Effluent Concentration Limit of I-131) **3/18**

**F** = dilution flow rate

**f** = effluent (waste water) flow rate through any of the three previously named monitors

**AF** = the allocation fraction; a conservative factor used to allocate portions of a shared dilution stream to separate concurrent releases to ensure the concentration limits of section 2.1 are not exceeded. The sum of allocation fractions for concurrent releases with a shared discharge point shall not exceed 1.0 and may be altered based on plant need. For cases where the ECL fraction exceeds 1.0, dilution is required to ensure compliance with section 2.1, and the allocation fraction must be applied to ensure this compliance is met.

**SF** = the safety factor; a conservative factor used to compensate for statistical fluctuations and errors of measurement; the default value is 1.0, however, this value may be set, administratively, to values less than 1.0

The setpoint calculation is based on the minimum dilution flow rate, the maximum possible effluent flow rate and due to changing conditions, I-131, which is the most restrictive isotope expected to be present.

ATTACHMENT A  
(Page 23 of 152)

OFFSITE DOSE CALCULATION MANUAL

In the event that a high alarm/trip is reached, the release will be terminated and evaluated to see if the limit of Section 2.1 was exceeded by using the actual Dilution Flow Rate, the actual Effluent Flow Rate and the actual isotopic analysis as outlined in Section 2.4.4.2. The setpoint will still be based on 10 times the 10 CFR 20 ECL of I-131 due to the changing conditions of activity and I-131 being the most restrictive isotope. **3/18**

#### **2.4.4.2 Batch Radioactive Liquid Effluent Monitor**

The two monitors associated with liquid batch releases are listed below:

<u>Monitor ID</u>	<u>Description</u>
0-HF-RE-45	Secondary Liquid Waste System Monitor
0-HB-RE-18	Liquid Radwaste Discharge Monitor

The High Alarm/Trip setpoint is a function of dilution flow rate, tank flow rate, and isotopic composition. A laboratory isotopic analysis is made of each batch prior to discharge. Based on the isotopic analysis and existing flow condition, the setpoint will be calculated and set on the appropriate monitor to ensure the 10 times the Effluent Concentration Limits of 10 CFR 20, Appendix B, Table 2, Column 2 (WCNOC ODCM Attachment A, Section 2.1) are not exceeded. The Alert/Alarm Setpoint is set to 80% of the High Alarm/Trip setpoint.

The High Alarm/Trip setpoints are determined using the following methodology:

- a. Determine concentrations of radioactivity of the batch being considered for release.

The isotopic concentration of the batch is the sum of the concentrations for the isotopes present as determined from the analysis required in Table 2-1.

$$\sum_i C_i = \sum_g C_g + C_a + C_s + C_t + C_f$$

Eq. 14

Where:

$C_i$  = the concentration of nuclide i as determined by the analysis of the waste sample



ATTACHMENT A  
(Page 24 of 152)

OFFSITE DOSE CALCULATION MANUAL

**C<sub>g</sub>** = the sum of the concentrations C<sub>g</sub> of each measured gamma emitting nuclide observed by gamma-ray spectroscopy of the waste sample

\***C<sub>a</sub>** = the measured concentration C<sub>a</sub> of alpha emitting nuclides observed by gross alpha analysis of the monthly composite sample

\***C<sub>s</sub>** = the measured concentrations of Sr-89 and Sr-90 in liquid waste as determined by analysis of the quarterly composite sample

\***C<sub>t</sub>** = the measured concentration of H-3 in liquid waste

\***C<sub>f</sub>** = the measured concentration of Fe-55 and Ni-63 in liquid waste as determined by analysis of the quarterly composite

\*Values for these concentrations will be based on previous composite sample analysis as required by Table 2-1.

- b. The measured radionuclide concentrations are used to calculate the Required Dilution Factor (RDF) which is the ratio of total dilution flow rate to tank flow rate required to assure that the limiting concentrations of Section 2.1 are met at the point of discharge. This is referred to as the Required Dilution Factor and is determined according to:

$$RDF = \frac{\left( \sum_i \frac{C_i}{ECL_i} \right) \cdot F}{AF \times SF} = f$$

Eq. 15

Where:

**RDF** = required dilution factor to meet 10 times 10 CFR 20 ECLs at point of discharge

**C<sub>i</sub>** = measured concentrations of C<sub>g</sub>, C<sub>a</sub>, C<sub>s</sub>, C<sub>t</sub> and C<sub>f</sub> as defined previously; terms C<sub>a</sub>, C<sub>s</sub>, C<sub>t</sub> and C<sub>f</sub> will be included in the calculation as appropriate **3/18**

**ECL<sub>i</sub>** = ECL<sub>g</sub>, ECL<sub>a</sub>, ECL<sub>s</sub>, ECL<sub>t</sub> and ECL<sub>f</sub> are 10 times the limiting concentration of the appropriate radionuclide from 10 CFR 20, Appendix B, Table 2, Column 2; for dissolved or entrained noble gases, the concentration shall be limited to 2.0E-04 µCi/ml total activity

ATTACHMENT A  
(Page 25 of 152)

OFFSITE DOSE CALCULATION MANUAL

**AF** = the allocation fraction; a conservative factor used to allocate portions of a shared dilution stream to separate concurrent releases to ensure the concentration limits of section 2.1 are not exceeded. The sum of allocation fractions for concurrent releases with a shared discharge point shall not exceed 1.0 and may be altered based on plant need. For cases where the ECL fraction exceeds 1.0, dilution is required to ensure compliance with section 2.1, and the allocation fraction must be applied to ensure this compliance is met.

**SF** = the safety factor; a conservative factor used to compensate for statistical fluctuations and errors of measurement; the default value is 1.0

**F** = dilution flow rate

**f** = effluent flow rate (waste water flow rate)

**c.** The calculated maximum permissible waste tank effluent flow rate ( $f_{max}$ ) is based on the Required Dilution Factor (RDF) and the effective dilution flow rate ( $F_{eff}$ ).

$$f_{max} \leq \frac{F_{eff} + f}{RDF} \approx \frac{F_{eff}}{RDF} \text{ for } f \ll F_{eff}$$

Eq. 16

Where:

**$f_{max}$**  = the calculated maximum permissible waste tank effluent flow rate

**f** = the expected effluent (waste stream) flow rate; normally the rated capacity of the effluent pump

**RDF** = the required dilution factor; as defined previously

$$F_{eff} = F_m \left[ 1 - \sum_i \frac{LC_i}{ECL_i} \right]$$

Eq. 17

Where:

**$F_{eff}$**  = effective dilution flow rate; this is applied since the cooling lake into which the effluent is discharged is also the dilution stream; this accounts for the recirculation of previously emitted radionuclides should they be detected by sample analysis of the cooling lake water

**$F_m$**  = the expected minimum dilution water flow rate; for the purpose of setpoint calculations, the expected minimum dilution flow rate is assigned a value based upon the type and number of pumps running into the circulating water piping

**$LC_i$**  = the measured concentration of nuclide i in the cooling lake water sample

ATTACHMENT A  
(Page 26 of 152)

OFFSITE DOSE CALCULATION MANUAL

**ECL<sub>i</sub>** = Effluent Concentration Limit; set to 10 times the Effluent Concentration Limit of nuclide's from 10 CFR 20, Appendix B, Table 2, Column 2 in accordance with ODCM Attachment A, Section 2.1

Thus the pump flow rate,  $f$ , in the above equation is set at or below  $f_{\max}$ . Even though the value of  $f_{\max}$  may be larger than the actual effluent pump capacity, it does represent the upper limit to the effluent flow rate, whereby the requirement of 10 CFR 20 may still be met. If  $RDF \leq 1$ , the effluent pump flow rate may be assigned any value since the waste tank effluent concentration meets the limits of 10 CFR 20 without dilution and the release may be made without regard to the setpoints for other release pathways. For those discharge pathways selected to be secured during the release under consideration, the pump flow rate should be set at as low a value as practicable to detect any inadvertent release. A setpoint for the dilution stream flow rate is not applicable since the minimum flow rate is administratively set.

d. The liquid radiation monitor setpoint may now be determined based on the values of  $\sum_i C_i$ ,  $f$ , and  $f_{\max}$  as previously defined. The monitor response is primarily due to gamma radiation; therefore, the actual setpoint is based on  $\sum_g$  and  $C_g$ . The calculated monitor setpoint concentration is determined as follows:

$$c = A \sum_g C_g (\mu\text{Ci/ml})$$

Eq. 18

Where:

**A** = adjustment factor which will allow the setpoint to be established in a practical manner for convenience and to prevent spurious alarms

$$A = \frac{f_{\max}}{f}$$

Eq. 19

If  $A > 1$ , calculate  $c$  to determine the maximum value for the actual monitor setpoint ( $\mu\text{Ci/ml}$ ).

If  $A < 1$ , no release may be made. Calculations must be repeated to reduce monitor setpoint by applying a combination of higher dilution flow, lower tank/system release rate, or increased allocation fraction (AF).

ATTACHMENT A  
(Page 27 of 152)

## OFFSITE DOSE CALCULATION MANUAL

If RDF < 1, no further dilution is required and the release may be made without regard to available dilution or to other releases made simultaneously. However, it is necessary to establish a monitor setpoint which will provide alarm should the release concentration inadvertently exceed 10 CFR 20 limits. This can be accomplished by establishing the adjustment factor as follows:

$$A = \frac{1}{\text{RDF}}$$

Eq. 20

ATTACHMENT A  
(Page 28 of 152)

OFFSITE DOSE CALCULATION MANUAL

**3.0 Gaseous Effluents**

Gaseous effluent releases from the Unit Vent and Radwaste Building Vent are monitored continuously. The Unit Vent is the release point for the Fuel/Auxiliary Building, access control area, containment purge, and condenser air discharge. The Radwaste Building Vent is the release point for Waste Gas Decay Tanks and the Radwaste Building Ventilation System.

Waste Gas Decay Tank releases and Containment Building releases are treated as batch releases. Waste Gas Decay Tank releases are monitored by the Radwaste Building Exhaust Monitor. Containment Building releases (purges) are monitored by the Containment Purge System monitors and the Plant Unit Vent Monitor.

Monitor identifications are as follows:

<u>Monitor ID</u>	<u>Release Point Description</u>
O-GT-RE-21 A and B	Unit Vent (Fuel/Auxiliary Building, access control area, containment purge, condenser air discharge)
O-GH-RE-10 A and B	Radwaste Building Vent (Radwaste Building, waste gas decay tank discharge. Acts to isolate Waste Gas Decay Tank discharge)
O-GT-RE-22 and 33	Containment Purge System Monitor (acts to isolate the purge; is not an effluent monitor)
O-GT-RE-31 and 32	Containment Atmosphere Monitor (acts to isolate purge; not an effluent monitor)

The setpoint for monitors may be determined either based on total body dose or skin dose rate. The dose rate limits are for dose rates at the SITE BOUNDARY. The monitor setpoint is the lesser of the total body dose rate or skin dose rate. **3/18**

ATTACHMENT A  
(Page 29 of 152)

OFFSITE DOSE CALCULATION MANUAL

### 3.1 Dose Rate - Compliance with Technical Specification 5.5.4.g

The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY shall be limited to the following:

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

#### 3.1.1 Remedial Action

With the dose rate(s) exceeding the above limits, immediately restore the release to within the above limit(s).

#### 3.1.2 Surveillance Requirements

The dose rate to radionuclides in gaseous effluents shall be determined to be within the above limits in accordance with the methodology described below by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 3-1.

Based on the methodology of NUREG-0133:

Release rate limit for noble gases:

$$\left(\overline{X/Q}\right) \sum_i K_i Q_i < 500 \text{ mrem/yr for the total body}$$

Eq. 21

$$\left(\overline{X/Q}\right) \sum_i (L_i + 1.1 M_i) Q_i < 3000 \text{ mrem/yr for the skin}$$

Eq. 22

Where:

$K_i$  = the total body dose factor due to gamma emissions for each identified noble gas radionuclide, in mrem/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2)

$\left(\overline{X/Q}\right) = 2.2\text{E-}06 \text{ sec}/\text{m}^3$  at 1200 meters

**3/18**

$Q_i$  = the release rate of radionuclide i in gaseous effluent from all vent releases, in  $\mu\text{Ci}/\text{sec}$  **3/18**

Revision: 9	OFFSITE DOSE CALCULATION MANUAL	AP 07B-003
Information Use		Page 38 of 160

ATTACHMENT A  
(Page 30 of 152)

OFFSITE DOSE CALCULATION MANUAL

$L_i$  = the skin dose factor due to beta emissions for each identified noble gas radionuclide, in mrem/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2)

$M_i$  = the air dose factor due to gamma emissions for each identified noble gas radionuclide, in mrad/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2)

1.1 = unit conversion constant of 1.1 mrem/mrad converts air dose to skin dose **3/18**

Release rate limit for all radionuclides and radioactive materials in particulate form and radionuclides other than noble gases:

$$\left(\overline{X/Q}\right) \sum_i R_{aij}^i Q_i < 1500 \text{ mrem/yr to any organ (j)}$$

Eq. 23

Where:

$\left(\overline{X/Q}\right) = 2.2\text{E-}06 \text{ sec}/\text{m}^3$  at 1200 meters

**3/18**

$R_{aij}^i$  = the dose parameter for radionuclides other than noble gases for the inhalation pathway (I) summed separately over the radionuclides (i) for each organ (j) and age group (a), in mrem/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.5-4); see step 3.2.2.2 ( $R_{aij}^i$  for Inhalation Pathway Factor) for the calculation of  $R_{aij}^i$  for the child age group

$Q_i$  = the release rate of radionuclide i in gaseous effluent from all vent releases, in  $\mu\text{Ci}/\text{sec}$

All radioiodines are assumed to be released in elemental form. The limit is applicable to the location (unrestricted area boundary or beyond), characterized by the value of  $X/Q$  which results in the maximum total body or skin dose commitment. The factors  $K_i$ ,  $L_i$ , and  $M_i$  relate the radionuclide airborne concentrations to various dose rates assuming a semi-infinite cloud. These factors are taken from Table B-1 of the Regulatory Guide 1.109 and multiplied by  $10^6$  to convert  $\text{pCi}^{-1}$  to  $\mu\text{Ci}^{-1}$  and listed in Table A.1-2.

ATTACHMENT A  
(Page 31 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-1**  
RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sample Frequency	Principal Gamma Emitters	H-3 (Oxide)	I-131/ I-133	Gross Alpha	Sr-89, Sr-90
<b>1. Unit Vent:</b>						
Gas LLD(1)	M	M(3) (2) 1E-4	M(4) 1E-6			
Particulate LLD(1)	Continuous(5)	W(6) (2) 1E-11			M 1E-11	Q Composite 1E-11
Charcoal LLD(1)	Continuous(5)			W(6) 1E-12/ 1E-10		
<b>2. Radwaste Building Vent:</b>						
Gas LLD(1)	M	M(2) 1E-4	M 1E-6			
Particulate LLD(1)	Continuous(5)	W(6) (2) 1E-11			M 1E-11	Q Composite 1E-11
Charcoal LLD(1)	Continuous(5)			W(6) 1E-12/ 1E-10		
<b>3. Containment Purge or Vent:</b>						
Gas LLD(1)	P(3)	P(3) (2) 1E-4	M 1E-6			
<b>4. Waste Gas Decay Tanks:</b>						
Gas LLD(1)	P	P(2) 1E-4				

LLD = (pCi/ml)

NOTATIONFREQUENCY

S	At least once per 12 hours
D	At least once per 24 hours
W	At least once per 7 days
M	At least once per 31 days
Q	At least once per 92 days
SA	At least once per 184 days
R	At least once per 18 months
S/U	Prior to each reactor startup
N.A.	Not Applicable
P	Completed prior to each release



ATTACHMENT A  
(Page 32 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-1 (Continued)**

## TABLE NOTATIONS

(1) The LLD is defined, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

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

$$LLD = \frac{4.66 s_b}{E \times V \times (2.22E+6) \times Y \times Decay}$$

Eq. 24

Where:

**LLD** = the "a priori" lower limit of detection (microCuries per unit mass or volume)

**S<sub>b</sub>** = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, in counts per minute

$$s_b = \sqrt{B/LT}$$

Eq. 25

Where:

**B** = background sum (counts)

**LT** = live time (minutes)

**E** = the counting efficiency (counts per disintegration)

**V** = the sample size (units of mass or volume)

**2.22x10<sup>6</sup>** = the number of disintegrations per minute per microCurie

**Y** = the fractional radiochemical yield, when applicable

**Decay** = decay factor(s); there are three decay factors that may be appropriate for use depending on the nature of the sample and the half-life of the nuclide; any combination of the three may be used; the factors are as follows:

ATTACHMENT A  
(Page 33 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-1 (Continued)**

## TABLE NOTATIONS

- a) This decay factor corrects for decay from the time of sampling to the start of the analysis:

$$e^{-\lambda \Delta t_s}$$

Eq. 26

Where:

$\Delta t_s$  = decay time = acquisition start time - sample time

$\lambda$  = ln2/half-life

- b) This decay factor corrects for decay during the analysis:

$$\frac{1 - e^{-\lambda RT}}{\lambda \times RT}$$

Eq. 27

Where:

$\lambda$  = ln2/half-life

**RT** = real time of counting

- c) This decay factor corrects for decay during sampling:

$$\frac{1 - e^{-\lambda \Delta t_d}}{\lambda \Delta t_d}$$

Eq. 28

Where:

$\lambda$  = ln2/half-life

$\Delta t_d$  = deposition time = (sample time - deposition start time), or for effluents only (sample time - midpoint of sample period)

**NOTE**

All times used in decay calculations should be in the same units.

Typical values of E, V, Y,  $t_s$ ,  $t_d$  should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

ATTACHMENT A  
(Page 34 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-1 (Continued)**

## TABLE NOTATIONS

For very low background counting, the LLD can be optionally calculated as follows:

$$LLD = \frac{2.71 + 4.66 s_b}{E \times V \times 2.22 \times 10^6 \times Y \times \text{Decay}}$$

Eq. 29

(2) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141 and Ce-144 in iodine and particulate releases. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radioactive Effluent Release Report. **3/18**

(3) Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change greater than or equal to 15% of RATED THERMAL POWER within 1 hour period.

(4) Tritium grab samples shall be taken and analyzed at least once per 24 hours when the refueling canal is flooded.

(5) The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Sections 3.1, 3.2 and 3.3.

(6) Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. For unit vent, sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period, and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement to sample once per 24 hours does not apply if analysis shows that both the DOSE EQUIVALENT I-131 concentration in the reactor coolant and the unit vent noble gas monitor activity have not increased more than a factor of 3.

ATTACHMENT A  
(Page 35 of 152)

OFFSITE DOSE CALCULATION MANUAL

### 3.2 Dose - Compliance With 10 CFR 50 Appendix I

#### 3.2.1 Noble Gases

The air dose due to noble gases released in gaseous effluents, from each unit, to areas at and beyond the SITE BOUNDARY shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation, and
- b. During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

##### 3.2.1.1 Remedial Action

With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, a special report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

##### 3.2.1.2 Surveillance Requirements

Cumulative dose contributions for the current calendar quarter and calendar year for noble gases shall be determined in accordance with the following methodology at least once per 31 days. The dose calculations for the actual releases of radioactive noble gases in gaseous effluent will be consistent with the methodology provided in Regulatory Guide 1.109, Rev. 1. The following dose calculations will be performed:

During any calendar quarter, for gamma radiation:

$$D = 3.17E-8 \sum_{i=1} M_i \left[ \left( \frac{X}{Q} \right) \times Q_i \right] \leq 5 \text{ mrad}$$

Eq. 30

ATTACHMENT A  
(Page 36 of 152)

OFFSITE DOSE CALCULATION MANUAL

During any calendar quarter, for beta radiation:

$$D = 3.17E-8 \sum_{i=1} N_i \left[ \left( \overline{X/Q} \right) \times Q_i \right] \leq 10 \text{ mrad}$$

Eq. 31

During any calendar year, for gamma radiation:

$$D = 3.17E-8 \sum_{i=1} M_i \left[ \left( \overline{X/Q} \right) \times Q_i \right] \leq 10 \text{ mrad}$$

Eq. 32

During any calendar year, for beta radiation:

$$D = 3.17E-8 \sum_{i=1} N_i \left[ \left( \overline{X/Q} \right) \times Q_i \right] \leq 20 \text{ mrad}$$

Eq. 33

Where:

**3.17E-8** = the inverse of the number of seconds in a year

**M<sub>i</sub>** = the air dose factor due to gamma emissions for each identified noble gas radionuclide, in mrad/yr per  $\mu\text{Ci}/\text{m}^3$ ; Table A.1-2 (Regulatory Guide 1.109, Table B-1, Column 4)

**N<sub>i</sub>** = the air dose factor due to beta emissions for each identified noble gas radionuclide, in mrad/yr per  $\mu\text{Ci}/\text{m}^3$ ; Table A.1-2 (Regulatory Guide 1.109, Table B-1, Column 2)

$\left( \overline{X/Q} \right)$  =  $2.2E-06 \text{ sec}/\text{m}^3$  at 1200 meters **3/18**

**Q<sub>i</sub>** = the release of noble gas radionuclides i in gaseous effluents, in  $\mu\text{Ci}$ ; releases shall be cumulative over the calendar quarter or year as appropriate

### **3.2.2 Radioiodines, Particulates and Other Radionuclides**

The dose to a MEMBER OF THE PUBLIC from Iodine-131 and 133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each unit, to areas at and beyond the SITE BOUNDARY shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrems to any organ; and
- b. During any calendar year: Less than or equal to 15 mrems to any organ.

ATTACHMENT A  
(Page 37 of 152)

OFFSITE DOSE CALCULATION MANUAL

### 3.2.2.1 Remedial Action

With the calculated dose from the release of Iodine-131 and 133, tritium, and radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, a special report that identifies the cause(s) for exceeding the limits and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

### 3.2.2.2 Surveillance Requirements

Cumulative dose contributions for the current calendar quarter and current calendar year for Iodine-131 and 133, tritium, and radionuclides in particulate form with half-lives greater than 8 days shall be determined in accordance with the following methodology at least once per 31 days. To show compliance, the dose calculations for the actual releases of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, Revision 1. The following dose calculations will be performed:

For the calendar quarter:  $D(\text{mrem}) = 3.17\text{E-}8 \sum_i R_{aj} [(WQ_i)] \leq 7.5 \text{ mrem}$

Eq. 34

For the calendar year:  $D(\text{mrem}) = 3.17\text{E-}8 \sum_i R_{aj} [(WQ_i)] \leq 15 \text{ mrem}$

Eq. 35

Where:

**3.17E-8** = the inverse of the number of seconds in a year

**Q<sub>i</sub>** = the release of radioiodines, radioactive materials in particulate form and radionuclides other than noble gases in gaseous effluents *i*, in  $\mu\text{Ci}$ . Releases shall be cumulative over the calendar quarter or year as appropriate. The  $Q_i$  value shall be determined as the product of the flow rate through the release point and grab samples of the effluent analyzed in accordance with Table 3-1.

**W** = the annual average dispersion parameter for estimating the dose to an individual at the controlling location

**W** =  $(X/Q)$ ,  $2.2\text{E-}6 \text{ sec/m}^3$  for the inhalation pathway

**W** =  $(D/Q)$ ,  $1.8\text{E-}8 \text{ m}^{-2}$  for the food and ground plane pathways

**R<sub>aij</sub>** = the dose factor for each identified radionuclide *i*, in mrem/yr per  $\mu\text{Ci/m}^3$ , for each age group *a* and target organ *j*; Tables A.5-2 through A.5-20

ATTACHMENT A  
(Page 38 of 152)

OFFSITE DOSE CALCULATION MANUAL

**Inhalation Pathway Factor,  $R_{aj}^I [X/Q]$**

$$R_{aj}^I [X/Q] = K'(BR)_a (DFA_{ij})_{aj} (\text{mrem/yr per } \mu\text{Ci/m}^3)$$

Eq. 36

Where:

$K'$  = a constant of unit conversion,  $10^6 \text{ pCi}/\mu\text{Ci}$

$(BR)_a$  = the breathing rate of the receptor age group a, in  $\text{m}^3/\text{yr}$   
(Regulatory Guide 1.109, Table E-5)

Infant = 1400  $\text{m}^3/\text{yr}$

Child = 3700  $\text{m}^3/\text{yr}$

Teen = 8000  $\text{m}^3/\text{yr}$

Adult = 8000  $\text{m}^3/\text{yr}$

$(DFA_{ij})_{aj}$  = the maximum organ inhalation dose factor for age group a, organ j and radionuclide i, in  $\text{mrem/pCi}$ ; the body is considered an organ in the selection of  $(DFA_{ij})_{aj}$ ; see Tables A.2-1 through A.2-4 (Regulatory Guide 1.109, Tables E-7 through E-10)

**Ground Plane Pathway Factor,  $R_i^G [D/Q]$**

$$R_i^G [D/Q] = K'K''(\text{SF})\text{DFG}_i \left[ \frac{(1 - e^{-\lambda_i t})}{\lambda_i} \right] \left( \frac{\text{m}^2 \cdot \text{mrem/yr}}{\mu\text{Ci/sec}} \right)$$

Eq. 37

Where:

$K'$  = a constant of unit conversion,  $10^6 \text{ pCi}/\mu\text{Ci}$

$K''$  = a constant of unit conversion, 8760  $\text{hr/year}$

$\lambda_i$  = the decay constant for radionuclide i,  $\text{sec}^{-1}$

$t$  = the exposure time, 9.47E8  $\text{sec}$  (30 years)

$\text{DFG}_i$  = the ground plane dose conversion factor for radionuclide i, in  $\text{mrem/hr per pCi/m}^2$ ; note that all age groups and organs are assumed to receive the same dose for the total body; see Table A.2-5 (Regulatory Guide 1.109, Table E-6)

$\text{SF}$  = the shielding factor 0.7, dimensionless (Regulatory Guide 1.109, Table E-15)

ATTACHMENT A  
(Page 39 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Grass-Cow-Milk Pathway Factor,  $R_{aij}^c [D/Q]$** 

$$R_{aij}^c [D/Q] = K' \left( \frac{Q_F (U_{ap})}{\lambda_i + \lambda_w} \right) F_m(r) (DFL_i)_{aj} (f_p / Y_p) (e^{-\lambda_i t_f}) \left( \frac{m^2 \cdot mrem/yr}{\mu Ci/sec} \right)$$

Eq. 38

Where:

**K'** = a constant of unit conversion,  $10^6$  pCi/ $\mu$ Ci**Q<sub>F</sub>** = the cow's consumption rate, 50 kg/day (wet weight) (Regulatory Guide 1.109, Table E-3)**U<sub>ap</sub>** = the receptor's milk consumption rate for age group a, in liters/yr (Regulatory Guide 1.109, Table E-5)

Infant = 330 l/yr

Child = 330 l/yr

Teen = 400 l/yr

Adult = 310 l/yr

**Y<sub>p</sub>** = the agricultural productivity by unit area of pasture feed grass, 0.7 kg/m<sup>2</sup> (Regulatory Guide 1.109, Table E-15)**F<sub>m</sub>** = the stable element transfer coefficient, in days/liter; see Table A.3-5 (Regulatory Guide 1.109, Table E-1)**r** = the fraction of deposited activity retained on the cow's feed grass; a value of 1.0 is used for radioiodines and 0.2 for particulates (Regulatory Guide 1.109, Table E-15)**(DFL<sub>i</sub>)<sub>aj</sub>** = the ingestion dose factor for age group a, radionuclide i and organ j, in units of mrem/pCi ingested; see Tables A.3-1 through A.3-4 (Regulatory Guide 1.109, Tables E-11 through E-14)**λ<sub>i</sub>** = the decay constant for radionuclide i, in sec<sup>-1</sup>**λ<sub>w</sub>** = the decay constant for removal of activity on leaf and plant surfaces by the process of weathering, 5.73E-7 sec<sup>-1</sup> (corresponding to a 14 day half-life)**f<sub>p</sub>** = the product of the fraction of the year that the cow is on pasture and the fraction of cow feed that is pasture grass; the value is assumed to be 1.0, which is the most restrictive case**t<sub>f</sub>** = the transport time for consumption of fresh pasture grass; the time from pasture, to cow, to milk, to receptor, in units of seconds; 1.73E5 sec (2 days) (Regulatory Guide 1.109, Table E-15) **3/18**



ATTACHMENT A  
(Page 40 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Grass-Goat-Milk Pathway Factor,  $R_{aij}^C [D/Q]$** 

$$R_{aij}^C [D/Q] = K' \left( \frac{Q_F (U_{ap})}{\lambda_i + \lambda_w} \right) F_m(r) (DFL_i)_{aj} (f_p / Y_p) (e^{-\lambda t_f}) \left( \frac{m^2 \cdot mrem/yr}{\mu Ci/sec} \right)$$

Eq. 39

Where:

$Q_F$  = the goat's consumption rate, 6 kg/day (wet weight) (Regulatory Guide 1.109, Table E-3)

$t_f$  = the transport time for consumption of fresh pasture grass; the time from pasture, to goat, to milk, to receptor, in units of seconds; 1.73E5 sec (2 days) (Regulatory Guide 1.109, Table E-15)  
**3/18**

$f_p$  = the product of the fraction of the year that the goat is on pasture and the fraction of goat feed that is pasture grass; the value is assumed to be 1.0, which is the most restrictive case

All other terms are defined under the Grass-Cow-Milk-Pathway Factor.

The concentration of tritium in cow or goat milk is based on the airborne concentration rather than the deposition. Therefore, the  $R_{aij}^C$  is based on (X/Q),

$$R_{aij}^C [X/Q] = K' K''' F_m Q_F U_{ap} (DFL_i)_{aj} [0.75 (0.5/H)] (mrem/yr \text{ per } \mu Ci/m^3)$$

Eq. 40

Where:

$K'''$  = a constant of unit conversion,  $10^3$  gm/kg

$H$  = absolute humidity of the atmosphere, 8 gm/m<sup>3</sup> (Regulatory Guide 1.109)

**0.75** = the fraction of total feed that is water (NUREG 0133)

**0.5** = the ratio of the specific activity of the feed grass water to the atmospheric water (NUREG 0133)

All other terms are previously defined.

ATTACHMENT A  
(Page 41 of 152)

OFFSITE DOSE CALCULATION MANUAL

**Grass-Cow-Meat Pathway Factor,  $R_{aij}^M [D/Q]$**

$$R_{aij}^M [D/Q] = K' \left( \frac{Q_F (U_{ap})}{\lambda_i + \lambda_w} \right) F_m(r) (DFL_i)_{aj} (f_p/Y_p) (e^{-\lambda_i t_f}) \left( \frac{m^2 \cdot mrem/yr}{\mu Ci/sec} \right)$$

Eq. 41

Where:

$F_m$  = the stable element transfer coefficient, in days/kg; see Table A.3-5 (Regulatory Guide 1.109, Table E-1)

$U_{ap}$  = the receptor's meat consumption rate for age group a, in kg/yr (Regulatory Guide 1.109, Table E-5)

Infant = 0 kg/yr

Child = 41 kg/yr

Teen = 65 kg/yr

Adult = 110 kg/yr

$t_f$  = the transport time for consumption of fresh pasture grass; the time from pasture, to cow, to receptor, in units of seconds; 1.73E6 seconds (20 days) (Regulatory Guide 1.109, Table E-15) **3/18**

All other terms are previously defined.

The concentration of tritium in meat is based on its airborne concentration rather than the deposition. Therefore, the  $R_{aij}^M$  is based on (X/Q): (terms defined previously)

$$R_{aij}^M [X/Q] = K' K'' F_m Q_F U_{ap} (DFL_i)_{aj} [0.75 (0.5/H)] (mrem/yr \text{ per } \mu Ci/m^3)$$

Eq. 42

ATTACHMENT A  
(Page 42 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Vegetation Pathway Factor,  $R_{aj}^V [D/Q]$** 

Man is considered to consume two types of vegetation (fresh and stored) that differs only in the time period between harvest and consumption, therefore:

$$R_{aj}^V [D/Q] = K' \left[ \frac{r}{Y_v(\lambda_i + \lambda_w)} \right] (DFL_i)_{aj} \left[ (U_a^L)(f_L)(e^{-\lambda_i t_L}) + (U_a^S)(f_g)(e^{-\lambda_i t_h}) \right] \left( \frac{m^2 \cdot mrem/yr}{\mu Ci/sec} \right)$$

Eq. 43

Where:

$K'$  = a constant of unit conversion,  $10^6$  pCi/ $\mu$ Ci

$U_a^L$  = the consumption rate of fresh leafy vegetation by the receptor for age group a, in kg/yr (Regulatory Guide 1.109, Table E-5)

Infant = 0 kg/yr

Child = 26 kg/yr

Teen = 42 kg/yr

Adult = 64 kg/yr

$U_a^S$  = the consumption rate of stored vegetation by the receptor for age group a, in kg/yr (Regulatory Guide 1.109, Table E-5)

Infant = 0 kg/yr

Child = 520 kg/yr

Teen = 630 kg/yr

Adult = 520 kg/yr

$f_L$  = the fraction of the annual intake of fresh leafy vegetation grown locally; the default value is 1.0 (Regulatory Guide 1.109, Table E-15)

$f_g$  = the fraction of the annual intake of stored vegetation grown locally; the default value is 0.76 (Regulatory Guide 1.109, Table E-15)

$t_L$  = the average time between harvest of leafy vegetation and its consumption, in units of seconds; the default value is  $8.6E4$  seconds (1 day) (Regulatory Guide 1.109)

$t_h$  = the average time between harvest of stored vegetation and its consumption, in units of seconds; the default value is  $5.18E6$  seconds (60 days) (Regulatory Guide 1.109, Table E-15)

ATTACHMENT A  
(Page 43 of 152)

OFFSITE DOSE CALCULATION MANUAL

$Y_v$  = the agricultural productivity by unit area of leafy vegetation, in units of kg/m<sup>2</sup>; the default value is 2.0 kg/m<sup>2</sup> (Regulatory Guide 1.109, Table E-15) **3/18**

All other factors previously defined.

The concentration of tritium in vegetation is based on the airborne concentration rather than the deposition. Therefore, the  $R_{aij}^v$  is based on (X/Q):

$$R_{aij}^v[X/Q] = K'K'''[U_{afL}^L + U_{afg}^S](DFL_i)_{aj}[0.75(0.5/H)] \text{ in } \frac{\text{mrem}}{\text{yr}} \cdot \frac{\text{m}^3}{\mu\text{Ci}}$$

Eq. 44

All terms defined previously. All values indicated are default values from Regulatory Guide 1.109, Rev. 1.

### **3.3 Projected Dose**

The VENTILATION EXHAUST TREATMENT SYSTEM and the WASTE GAS HOLDUP SYSTEM shall be FUNCTIONAL and appropriate portions of these systems shall be used to reduce releases of radioactivity when the projected doses in 31 days due to gaseous effluent releases, from each unit, to areas at and beyond the SITE BOUNDARY would exceed:

- a. 0.2 mrad to air from gamma radiation, or
- b. 0.4 mrad to air from beta radiation, or
- c. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC.

#### **3.3.1 Remedial Action**

With radioactive gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, a special report that includes the following information:

- a. Identification of any nonfunctional equipment or subsystems, and the reason for the nonfunctionality,
- b. Action(s) taken to restore the nonfunctional equipment to FUNCTIONAL status, and
- c. Summary description of action(s) taken to prevent a recurrence.

ATTACHMENT A  
(Page 44 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**3.3.2 Surveillance Requirements**

**3.3.2.1** Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the following methodology when Gaseous Radwaste Treatment Systems are not being fully utilized.

$$D_{31} = \left[ \frac{A}{T} \right] \times 31$$

Eq. 45

Where:

$D_{31}$  = projected 31 day dose

**A** = cumulative dose for previous three calendar months

**T** = number of days that the cumulative dose occurred in A above

**3.3.2.2** The installed VENTILATION EXHAUST TREATMENT SYSTEM and WASTE GAS HOLDUP SYSTEM shall be considered FUNCTIONAL by meeting Section 3.1 and 3.2 limits.

**3.4 Instrumentation**

The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3-2 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of Section 3.1 are not exceeded. The Alarm/Trip Setpoints of these channels meeting Section 3.1 shall be determined and adjusted in accordance with the methodology and parameters of Section 3.4.4.

**3.4.1 Remedial Action**

- a. With a radioactive gaseous effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel nonfunctional.
- b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels FUNCTIONAL take the ACTION shown in Table 3-2. Restore the nonfunctional instrumentation to FUNCTIONAL status within the time specified in the ACTION, or explain in the next annual Radioactive Effluent Release Report why this nonfunctionality was not corrected within the time specified.

ATTACHMENT A  
(Page 45 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**3.4.2 Surveillance Requirements**

Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated FUNCTIONAL by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL OPERATIONAL TEST at the frequencies shown in Table 3-3.

ATTACHMENT A  
(Page 46 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-2**  
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS FUNCTIONAL</u>	<u>APPLICABILITY</u>	<u>ACTION</u>
<b>1. Unit Vent System</b>			
a. Noble Gas Activity Monitor - Providing Alarm (GT-RE-21B)	1	*	40
b. Iodine Sampler (GT-RE-21A, GT-RE-21B)	1	*	43
c. Particulate Sampler (GT-RE-21A, GT-RE-21B)	1	*	43
d. Flow Rate	N.A.	*	45
e. Sampler Flow Rate Monitor	1	*	39
<b>2. Containment Purge System</b>			
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release (GT-RE-22, GT-RE-33)	1	*	41
b. Flow Rate	N.A.	*	45
<b>3. Radwaste Building Vent System</b>			
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release (GH-RE-10B)	1	*	38,40
b. Iodine Sampler (GH-RE-10A, GH-RE-10B)	1	*	43
c. Particulate Sampler (GH-RE-10A, GH-RE-10B)	1	*	43
d. Flow Rate	N.A.	*	45
e. Sampler Flow Rate Monitor	1	*	39

\*At all times.

ATTACHMENT A  
(Page 47 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-2 (Continued)**  
ACTION STATEMENTS

**ACTION 38** - With the number of channels FUNCTIONAL less than required by the minimum channels FUNCTIONAL requirement, the contents of the tank(s) may be released to the environment for up to 14 days provided that prior to initiating the release:

- a. At least two independent samples of the tank's contents are analyzed, and
- b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup.

Otherwise, suspend release of radioactive effluents via this pathway.

**ACTION 39** - With the number of channels FUNCTIONAL less than required by the minimum channels FUNCTIONAL requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours.

**ACTION 40** - With the number of channels FUNCTIONAL less than required by the minimum channels FUNCTIONAL requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 12 hours and these samples are analyzed for radioactivity within 24 hours.

**ACTION 41** - With the number of channels FUNCTIONAL less than required by the minimum channels FUNCTIONAL requirement, immediately suspend PURGING of radioactive effluents via this pathway.

**ACTION 43** - With the number of channels FUNCTIONAL less than required by the minimum channels FUNCTIONAL requirement, effluent releases via the affected pathway may continue for up to 30 days provided samples are continuously collected with auxiliary sample equipment as required in Table 3-1. Revised 08/11 to include either 'A' or 'B' pathways as options for fulfilling this requirement, as both fulfill the requirement of being samplers by plant design.

**ACTION 45** - Flow rate for this system shall be based on fan status and operating curves or actual measurements.



ATTACHMENT A  
(Page 48 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-3**  
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL OPERATIONAL TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
1. Unit Vent System					
a. Noble Gas Activity Monitor-Providing Alarm (GT-RE-21)	D	M	R(3)	Q(2)	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate	N.A.	N.A.	R(4)	N.A.	*
e. Sampler Flow Rate Monitor	D	N.A.	R	Q	*
2. Containment Purge System					
a. Noble Gas Activity Monitor-Providing Alarm and Automatic Termination of Release (GT-RE-22, GT-RE-33)	D	P	R(3)	Q(1)	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate	N.A.	N.A.	R(4)	N.A.	*
e. Sampler Flow Rate Monitor	D	N.A.	R	N.A.	*
3. Radwaste Building Vent System					
a. Noble Gas Activity Monitor-Providing Alarm and Automatic Termination of Release (GH-RE-10)	D, P	M, P	R(3)	Q(1)	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate	N.A.	N.A.	R(4)	N.A.	*
e. Sampler Flow Rate Monitor	D	N.A.	R	N.A.	*

\*At all times.

ATTACHMENT A  
(Page 49 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-3 (Continued)**

## TABLE NOTATIONS

(1) The CHANNEL OPERATIONAL TEST (COT) and TRIP ACTUATING DEVICE TEST (TADOT) shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation, as appropriate, occur if any of the following conditions exists: **3/18**

- a. Instrument indicates measured levels above the Alarm/Trip Setpoint (isolation and alarm), or
- b. Circuit failure (alarm only), or
- c. Instrument indicates a downscale failure (alarm only) or
- d. Instrument controls not set in operate mode (alarm only).

The quarterly requirements will be met, with the exception of the Shutdown Purge Dampers, which are isolated during Mode 1-4 and not available for testing. The Shutdown Purge Dampers will be tested every 18 months in Mode 5, 6, defueled per Technical Specification 3.6.3. The basis for Technical Specification 3.6.3 states that the 36 inch containment purge valves shall be sealed closed or closed with a blind flange installed in Mode 1, 2, 3 or 4. The safety analysis assumes that the 36 inch shutdown purge valves are closed at event initiation since they may be unable to close against the buildup of pressure following a LOCA. **3/18**

(2) The CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any one or combination of the following conditions exists:

- a. Instrument indicates measured levels above the alarm setpoint
- b. Circuit failure
- c. Instrument indicates a downscale failure
- d. Instrument controls not set in operate mode

ATTACHMENT A  
(Page 50 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE 3-3 (Continued)**

## TABLE NOTATIONS

(3) The initial CHANNEL CALIBRATION for each model detector shall be performed using one or more of the reference (gas, liquid and/or solid) standards certified by the National Institute of Standards and Technology (NIST) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NIST. These standards shall permit calibrating the system over its intended range of energy, measurement range, and establish monitor response to solid secondary calibration source(s). For subsequent CHANNEL CALIBRATION, NIST traceable standard (gas, liquid and/or solid) may be used; or a gas, liquid or solid source that has been correlated to the detectors initial CHANNEL CALIBRATION by relating it to equipment that was previously (within 30 days) calibrated by the same geometry and type of source traceable to NIST. **3/18**

With vendor concurrence, initial CHANNEL CALIBRATIONS for the same model and type detector are representative of all detectors of the same model and type. **3/18**

Initial detector CHANNEL CALIBRATIONS may be performed by a vendor in place of on-site initial CHANNEL CALIBRATION, providing all of the requirements specified in the ODCM and USA&R are met. **3/18**

(4) If flow rate is determined by exhaust fan status and fan performance curves, the following surveillance operations shall be performed at least once per 18 months:

- a. The specific vent flows by direct measurement, or
- b. The differential pressure across the exhaust fan and vent flow established by the fan's "flow- P" curve, or
- c. The fan motor horsepower measured and vent flow established by the fan's "flow-horsepower" curve.

ATTACHMENT A  
(Page 51 of 152)

OFFSITE DOSE CALCULATION MANUAL

### **3.4.3 Airborne Radiation Monitor Calibration Methodology**

The following monitors are associated with gaseous releases:

<u>Monitor ID</u>	<u>Monitor Description</u>	<u>Monitor Type</u>
O-GT-RE-21A	Plant Unit Vent	Particulate, Iodine
O-GH-RE-10A	Radwaste Building Effluent	Particulate, Iodine
O-GT-RE-21B	Plant Unit Vent	Wide Range Gas
O-GH-RE-10B	Radwaste Building Effluent	Wide Range Gas
O-GT-RE-22 & 33	Containment Purge Exhaust	Particulate, Iodine, Gas
O-GT-RE-31 & 32	Containment Atmosphere	Particulate, Iodine, Gas

#### **3.4.3.1 Particulate Detector**

Beta particulate is monitored by a 50 mm diameter by 0.25 mm thick plastic scintillator optically coupled to a 50 mm diameter photomultiplier tube. This detector shall be calibrated over its range of energy and rate capabilities.

For energy range calibration, multiple sources shall be used (typically four). Each source consists of a filter paper disk impregnated with a beta emitting radionuclide. Typical radionuclides used include Tc-99, Cs-137, Cl-36, and Rh-106. Each source shall be positioned in the filter paper retaining ring and counted separately. The count rates for each radionuclide source shall be recorded and the data plotted on a graph of cpm/ $\mu$ Ci versus average beta energy. This curve represents the detectors response characteristics over the range of beta energies observed. The efficiency for setpoint calculations shall be based on the efficiency of the detector for Cs-137. **3/18**

The detector shall be calibrated for its rate capabilities using a filter paper impregnated with standard activities of Cs-137. Increasing amounts of a standard Cs-137 solution shall be impregnated on a filter paper. The counts per minute for each Cs-137 standard shall be recorded. A determination of linearity shall be produced using the counts per minute vs. concentration data. At least three sources covering approximately  $\frac{1}{4}$ ,  $\frac{1}{2}$ , and  $\frac{3}{4}$  of full scale shall be checked.

With vendor concurrence, initial CHANNEL CALIBRATIONS for the same model and type detector are representative of all detectors of the same model and type. **3/18**

ATTACHMENT A  
(Page 52 of 152)

## OFFSITE DOSE CALCULATION MANUAL

Initial detector CHANNEL CALIBRATIONS may be performed by a vendor in place of on-site initial CHANNEL CALIBRATION, providing all of the requirements specified in the ODCM and USAR are met. **3/18**

**3.4.3.2 Iodine Detector**

Iodine gas is monitored by absorbing the gas on a charcoal filter element. The charcoal filter is viewed by an NaI(Tl) integral line gamma scintillator assembly.

Because of its short half-life and the difficulty in handling gaseous iodine, barium sources shall be used for calibration. The photo peaks of interest are as follows:

Ba-133: 356 KeV gamma is 0.69 efficient/disintegration

I-131: 364 KeV gamma is 0.82 efficient/disintegration

Therefore, each iodine disintegration will produce  $0.82/0.69 \times$  barium disintegrations. Assuming that the detector efficiency for 356 KeV is the same as for the 364 KeV, the sensitivity for I-131 equals  $1.19 \times$  Ba-133 (counts/min)  $\mu$ Ci. The standard sources shall be constructed by impregnating a standard Ba-133 standard into the charcoal filter element. The geometry shall simulate the iodine retention on the first surface of the charcoal. Sources shall be prepared to cover approximately  $\frac{1}{4}$ ,  $\frac{1}{2}$  and  $\frac{3}{4}$  of full scale. The barium counts per minute for each standard shall be adjusted to iodine counts per minute as described above. A determination of linearity shall be produced using the corrected counts per minute vs. concentration data. **3/18**

With vendor concurrence, initial CHANNEL CALIBRATIONS for the same model and type detector are representative of all detectors of the same model and type. **3/18**

Initial detector CHANNEL CALIBRATIONS may be performed by a vendor in place of on-site initial CHANNEL CALIBRATION, providing all of the requirements specified in the ODCM and USAR are met. **3/18**

**3.4.3.3 Gas Detector**

The gas detectors associated with monitors O-GT-RE-22 & 33, O-GT-RE-31 & 32 and the low-range detectors of monitors O-GT-RE-21B and O-GH-RE-10B are a plastic scintillator identical to the particulate detector. The mid-range and high-range detectors of monitors O-GT-RE-21B and O-GH-RE-10B are cadmium telluride, solid state sensors.

ATTACHMENT A  
(Page 53 of 152)

## OFFSITE DOSE CALCULATION MANUAL

Sources for all gas detectors shall be produced by evacuating the sample chamber with a vacuum pump. The sample chamber then shall be backfilled to the desired pressure with a source of standard Xe-133. The source is then counted and the counts per minute recorded. A determination of linearity shall be produced using the counts per minute vs. concentration data. Sources shall be prepared to cover approximately  $\frac{1}{4}$ ,  $\frac{1}{2}$  and  $\frac{3}{4}$  of full scale for the detectors associated with monitors O-GT-RE-22 and 33, O-GT-RE-31 and 32 and the low-range detectors of monitors O-GT-RE-21B and O-GH-RE-10B. At least one source shall be prepared for the mid/high range detector(s) to cover at least one point on the mid/high-range scale. For ALARA purposes, additional higher decades for the mid/high-range scale may be extrapolated using the data from the mid-range calibration and/or determined by the corresponding response to a solid source with emissive characteristics similar to that of Xe-133. **3/18**

With vendor concurrence, initial CHANNEL CALIBRATIONS for the same model and type detector are representative of all detectors of the same model and type. **3/18**

Initial detector CHANNEL CALIBRATIONS may be performed by a vendor in place of on-site initial CHANNEL CALIBRATION, providing all of the requirements specified in the ODCM and USAR are met. **3/18**

ATTACHMENT A  
(Page 54 of 152)

OFFSITE DOSE CALCULATION MANUAL

### **3.4.4 Airborne Monitor Setpoints**

#### **High Alarm Trip Setpoint Calculations**

The alarm trip setpoint is set to the lesser of the Total Body Dose Rate Setpoint or Skin Dose Rate Setpoint calculations, if the calculated setpoint does not exceed default maximum values.

#### **Total Body Dose Rate Setpoint Calculations**

The limit of the total body dose rate is 500 mrem/yr at the SITE BOUNDARY. The monitor alarm/trip setpoint based on total body dose will be calculated as follows: **3/18**

$$S_{tb} \leq (SF \times AF) \times D_{tb} \times R_t$$

Eq. 46

Where:

**S<sub>tb</sub>** = the monitors alarm/trip setpoint based on the total body dose rate, in units of  $\mu\text{Ci/cc}$

**D<sub>tb</sub>** = limit of 500 mrem/yr total body, conservatively interpreted as a continuous release over a one year period

**SF** = normally, the safety factor will be set to 0.85; this number is chosen since the gaseous monitors are set using Xe-133 energy level; Xe-133 comprises 85% of total noble gaseous activity expected (see USAR Table 11.1-1); if desired, the 0.85 can be further modified to compensate for statistical fluctuations and errors of measurement

**AF** = allocation factor for each release so that simultaneous releases can be made without exceeding the limit; the AF may be calculated as follows:

$$AF = \frac{RF}{TF}$$

Eq. 47

Where:

**RF** = release flow rate of the release point under consideration

**TF** = total flow rate of all release points including release under consideration

ATTACHMENT A  
(Page 55 of 152)

OFFSITE DOSE CALCULATION MANUAL

**IF** the monitor setpoint ( $S_{tb}$ ) units desired are  $\mu\text{Ci}/\text{sec}$ , **THEN** use 'c' in place of 'Q' as shown in the following equation for  $R_t$  ( $R_t$ , however, is no longer representing monitor response per mrem/yr); this results in:

$$R_t = \frac{c}{\left( \overline{X/Q} \sum_i K_i c_i \right)}$$

Eq. 48

$R_t$  = monitor response per mrem/yr to the total body, determined according to:

$$R_t = \frac{c}{\left( \overline{X/Q} \sum_i K_i Q_i \right)}$$

Eq. 49

Where:

**c** = the monitor response to the gaseous effluent noble gas, in  $\mu\text{Ci}/\text{cc}$ , corresponding to grab sample radionuclide concentrations

$\left( \overline{X/Q} \right) = 2.2\text{E}-06 \text{ sec}/\text{m}^3$  at 1200 meters **3/18**

**$K_i$**  = the total body dose factor due to gamma emissions from isotope  $i$ , in mrem/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2)

**$Q_i$**  = rate of release of noble gas radionuclide  $i$ , in  $\mu\text{Ci}/\text{sec}$ ; it is calculated by multiplying the concentration of radionuclide  $i$  by the waste stream release flow rate

### Skin Dose Rate Setpoint Calculations

The limit of the skin dose rate is 3000 mrem/yr at the SITE BOUNDARY. The monitor alarm/trip setpoint is calculated as follows: **3/18**

$$S_s \leq (SF \times AF) \times D_s \times R_s$$

Eq. 50

Where:

**$S_s$**  = the monitors alarm/trip setpoint based on the skin dose rate in  $\mu\text{Ci}/\text{cc}$

**$D_s$**  = the dose rate limit of 3000 mrem/yr to the skin of the body, conservatively interpreted as a continuous release over a one year period



ATTACHMENT A  
(Page 56 of 152)

OFFSITE DOSE CALCULATION MANUAL

**IF** the monitor setpoint ( $S_s$ ) units desired are  $\mu\text{Ci}/\text{sec}$ , **THEN** use 'c' in place of 'Q' as shown in the following equation for  $R_s$  ( $R_s$ , however, is no longer representing monitor response per mrem/yr), this results in:

$$R_s = \frac{c}{\left( \overline{X/Q} \sum_i (L_i + 1.1M_i) c_i \right)}$$

Eq. 51

$R_s$  = monitor response per mrem/yr to the skin of the body; determined according to:

$$R_s = \frac{c}{\left( \overline{X/Q} \sum_i (L_i + 1.1M_i) Q_i \right)}$$

Eq. 52

Where:

$L_i$  = the skin dose factor due to beta emissions from isotope i, in mrem/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2)

1.1 = the unit conversion constant of 1.1 mrem/mrad converts air dose to skin dose **3/18**

$M_i$  = the air dose factor due to gamma emissions from isotope i, in mrad/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2)

The factors SF, AF, c,  $\overline{X/Q}$  and  $Q_i$  are as defined under the Total Body Dose Rate Setpoint Calculations.

The actual monitor setpoint is the lower of the two values calculated (Total Body vs. Skin). **3/18**

A pre-release isotopic analysis is performed for batch releases from Waste Gas Decay Tanks and Containment Building purges to determine the identity and quantity of the principal radionuclides. The appropriate alarm/trip setpoint(s) are adjusted accordingly to ensure that the limits of 3.1 are not exceeded.

ATTACHMENT A  
(Page 57 of 152)

OFFSITE DOSE CALCULATION MANUAL

**Alert Alarm Setpoint Calculations**

The Noble Gas Alert Alarm for the Plant Unit Vent (O-GT-RE-21) and Radwaste Building Exhaust Monitor (O-GH-RE-10), is set to alert operators to that average concentration which if maintained for a full year would result in the 10 CFR 50, Appendix I Annual Dose Guidelines being reached. Section 3.2.1 limits the annual dose due to noble gases to  $\leq 10$  mrad for gamma radiation and  $\leq 20$  mrad for beta radiation. Section 3.2.2 limits the annual dose to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents to  $\leq 15$  mrem to any organ. These two sections contain the annual dose limits due to gaseous releases found in 10 CFR 50, Appendix I.

**Noble Gas Alert Alarm Setpoint Calculation**

The alert alarm setpoint is the lesser of:

$$S_{\gamma} \leq (SF \times AF) \times D_{\gamma} \times R_{\gamma}$$

Eq. 53

$$S_{\beta} \leq (SF \times AF) \times D_{\beta} \times R_{\beta}$$

Eq. 54

Where:

The factors **SF** and **AF** are as previously defined. **3/18**

**S<sub>γ</sub>** = monitor setpoint based on gamma radiation

**D<sub>γ</sub>** = limit of 10 mrad/yr, conservatively interpreted as a continuous release over a one year period

**R<sub>γ</sub>** = monitor response per mrad/yr; determined according to the following equation: (see Total Body or Skin Dose Rate Setpoint Calculations for calculation of the setpoint in  $\mu\text{Ci}/\text{sec}$ ; Equation 48 or 51)

$$R_{\gamma} = \frac{c}{\left( \overline{(X/Q)} \sum_i M_i \times Q_i \right)}$$

Eq. 55

Where:

The factors **c**,  $\overline{(X/Q)}$  and **Q<sub>i</sub>** are as previously defined. **3/18**

**M<sub>i</sub>** = the air dose factor due to gamma emissions for each identified noble gas radionuclide, in mrad/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2) **3/18**

ATTACHMENT A  
(Page 58 of 152)

OFFSITE DOSE CALCULATION MANUAL

$S_{\beta}$  = monitor setpoint based on beta radiation

$D_{\beta}$  = limit of 20 mrad/yr, conservatively interpreted as a continuous release over a one year period

$R_{\beta}$  = monitor response per mrad/yr; determined according to the following equation: (see Total Body or Skin Dose Rate Setpoint Calculations for calculation of the setpoint in  $\mu\text{Ci}/\text{sec}$ ; Equation 48 or 51)

$$R_{\beta} = \frac{c}{\left(\overline{X/Q}\right) \sum_i N_i \times Q_i}$$

Eq. 56

Where:

The factors  $c$ ,  $\overline{X/Q}$  and  $Q_i$  are as previously defined. 3/18

$N_i$  = the air dose factor due to beta emissions for each identified noble gas radionuclide,  $i$ , in mrad/yr per  $\mu\text{Ci}/\text{m}^3$  (Table A.1-2) 3/18

A semi-fixed alert alarm setpoint for the Plant Unit Vent Monitor (O-GT-RE-21) and Radwaste Building Vent Monitor (O-GH-RE-10) is calculated using the following equation:

$$\text{Setpoint } (\mu\text{Ci}/\text{cc}) = \frac{(10 \text{ mrad/yr})(.85)(AF)}{\left(\overline{X/Q}\right) \sum_i P_i \times M_i \times Q}$$

Eq. 57

Where:

$AF$  = either Unit Vent flow or Radwaste Building Vent flow divided by the combined flow of the Unit Vent and Radwaste Building Vent

$P_i$  = fractional value of isotope expected,  $C_i/C_T$

$C_i$  = concentration in  $\mu\text{Ci}/\text{cc}$  of isotope

$C_T$  = total gaseous activity from USAR Table 11.1-1

$Q$  = vent flow rate in cc/sec

The factors  $\overline{X/Q}$  and  $M_i$  are as previously defined. 3/18

ATTACHMENT A  
(Page 59 of 152)

OFFSITE DOSE CALCULATION MANUAL

Isotopes used and  $P_i$  values are as follows:

<u>ISOTOPE</u>	<u><math>P_i</math></u>
Kr-85M	.018
Kr-87	.010
Kr-88	.033
Xe-133M	.017
Xe-133	.851
Xe-135	.051

Should this semi-fixed alert alarm cause a continuous alarm condition, then actual setpoints will be calculated.

**Particulate And Iodine Alarm Setpoints**

Setpoints for the gaseous effluent particulate and iodine channels are set using Cs-137 MPC for particulates and I-131 MPC for iodines. The following is the calculation used:

$$\text{Setpoint } (\mu\text{Ci/cc}) = \frac{(\text{MPC}_i)(\text{AF})(\text{SF})}{(Q)(\bar{X}/Q)}$$

Eq. 58

Where:

$\text{MPC}_i = 5 \times 10^{-10} \mu\text{Ci/cc}$  for Cs-137

$= 1 \times 10^{-10} \mu\text{Ci/cc}$  for I-131

**AF** = as defined previously

**SF** = 0.0625 for I-131<sup>1</sup>

$= 0.9375$  for Cs-137<sup>1</sup>

**Q** = vent flow in m<sup>3</sup>/sec

This will provide the hi alarm setpoint. The alert alarm setpoint is 10% of the hi alarm setpoint.

<sup>1</sup> Derived from ratio of isotope activity (either I-131 or Cs-137) to sum of activity of Cs-137 and I-131 found in USAR Table 11.1-1 for reactor coolant.

ATTACHMENT A  
(Page 60 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**4.0 Total Dose**

The annual (Calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

**4.1 Remedial Action**

With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Section 2.2a, 2.2b, 3.2.1a, 3.2.1b, 3.2.2a and 3.2.2b calculation should be made including direct radiation contributions from the units and from outside storage tanks to determine whether the above limits of Section 4.0 above have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, a special report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits. This special report, as defined in 10 CFR 20.405e and 10CFR20.2203, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the special report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

**4.2 Surveillance Requirements**

**4.2.1** Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with the methodology of Sections 2.2 and 3.2 at least once per 31 days when the release of radioactive materials in liquid or gaseous effluents exceed twice the limits of Section 2.2a, 2.2b, 3.2.1a, 3.2.1b, 3.2.2a and 3.2.2b. Otherwise, no further evaluation is required.

ATTACHMENT A  
(Page 61 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**4.2.2** Cumulative dose contribution from direct radiation from the reactor unit and from Radwaste storage tanks shall be determined utilizing the results of routine plane perimeter surveys, DLR data or a combination of both, when necessary. This requirement is applicable only under conditions set forth in the remedial action above. **3/18**

**5.0 Radiological Environmental Monitoring Program (Contained in AP 07B-004)****6.0 Bases**

The bases contained on the succeeding pages summarizes the general requirements of Section 2.0, 3.0, 4.0 and 5.0 of the ODCM.

**Section 2.0 Liquid Effluents****Section 2.1 Concentration**

This section is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than 10 times the concentration levels specified in 10 CFR Part 20, Appendix B, Table 2, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within: (1) the Section II. A design objective of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC, and (2) the limits of 10 CFR Part 20.1301(e) to the population. The concentration limit for dissolved or entrained noble gases are based upon the assumption that Xe-135 is the controlling radioisotope and its effluent concentration in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2. This specification does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301.

The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Anal. Chem. 40, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

ATTACHMENT A  
(Page 62 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Section 2.2 Dose**

This section is provided to implement the requirements of Section II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. The remedial action implements the guides set forth in Section II.A of Appendix I and provides the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. The dose calculation methodology and parameters in the ODCM implement the requirements in Section III.A of Appendix I which specify that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

**Section 2.3 Liquid Radwaste Treatment System**

The FUNCTIONALITY of the Liquid Radwaste Treatment Systems ensures that this system will be available for use whenever liquid effluents require treatment prior to release to the environment. The requirement that the appropriate portions of this system be used when specified provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable." This section implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the Liquid Radwaste Treatment System were specified as a suitable fraction of the dose design objective set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

ATTACHMENT A  
(Page 63 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Section 2.4 Radioactive Liquid Effluent Monitoring Instrumentation**

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The Alarm/Trip Setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The FUNCTIONALITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50.

**Section 3.0 Gaseous Effluents****Section 3.1 Dose Rate**

This section provides reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA either at or beyond the SITE BOUNDARY in excess of the design objectives of Wolf Creek Technical Specification 5.5.4.g. This specification is provided to ensure that gaseous effluents from all units on the site will be appropriately controlled. It provides operational flexibility for the release of gaseous effluents to satisfy Wolf Creek Technical Specification 5.5.4.g. For MEMBERS OF THE PUBLIC who may at times be within the SITE BOUNDARY, the occupancy of that MEMBER OF THE PUBLIC will usually be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY to less than or equal to 500 mrem/year to the whole body or to less than or equal to 3000 mrem/year to the skin. These release rate limits also restrict, at all times the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrem/year. This specification does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301.



ATTACHMENT A  
(Page 64 of 152)

## OFFSITE DOSE CALCULATION MANUAL

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Anal. Chem 40, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

**Section 3.2.1 Dose - Noble Gases**

This section is provided to implement the requirements of Section II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The remedial action implements the guides set forth in Section II.B of Appendix I and provides the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The surveillance requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The dose calculation methodology and parameters established in the ODCM for calculating the doses due to the actual release rates of radioactive materials in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977. The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

ATTACHMENT A  
(Page 65 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Section 3.2.2 Dose - Iodine-131 and 133, Tritium and Radioactive Material in Particulate Form**

This section is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The remedial actions are the guides set forth in Section II.C of Appendix I, and provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in the surveillance requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculational 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 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations provide for determining the actual doses based upon historical average conditions. The release rate limits for Iodine-131 and 133, tritium, and radionuclides in particulate form with half lives greater than 8 days are dependent upon the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of these calculations were: (1) individual inhalation of airborne radionuclides, (2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, (3) deposition onto grassy areas where milk animals and meat producing animals graze with consumption of the milk and meat by man, (4) deposition on the ground with subsequent exposure of man.

ATTACHMENT A  
(Page 66 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Section 3.3 Gaseous Radwaste Treatment System**

The FUNCTIONALITY of the WASTE GAS HOLDUP SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the systems will be available for use whenever gaseous effluents require treatment prior to release to the environment. The requirement that the appropriate portions of this system be used when specified provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable." This section implements the requirements of 10 CFR 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Section II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

**Section 3.4 Radioactive Gaseous Effluent Monitoring Instrumentation**

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The Alarm/Trip Setpoints for these instruments shall be adjusted to values calculated in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of Wolf Creek Technical Specification 5.5.4.g. The FUNCTIONALITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. The sensitivity of any noble gas activity monitor used to show compliance with the gaseous effluent release requirements of Section 3.2 shall be such that concentrations as low as  $1 \times 10^{-6}$   $\mu\text{Ci/cc}$  are measurable.

ATTACHMENT A  
(Page 67 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**Section 4.0 Total Dose**

This section is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20 by 46 FR 18525. The section requires the preparation and submittal of a special report whenever the calculated doses due to releases of radioactivity and the radiation from uranium fuel cycle sources exceed 25 mrems to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems. For sites containing up to four reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor Units and from outside storage tanks are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR 190.11 and 10 CFR 20.2203, is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

**7.0 Reports****7.1 Annual Radiological Environmental Operating Report (contained in AP 07B-004)**

Revision: 9	OFFSITE DOSE CALCULATION MANUAL	AP 07B-003
Information Use		Page 76 of 160

ATTACHMENT A  
(Page 68 of 152)

OFFSITE DOSE CALCULATION MANUAL

**7.2 Annual Radioactive Effluent Release Report**

The Annual Radioactive Effluent Release Report (ARERR) shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the Unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof. The ARERR is to be submitted before May 1 of each year.

For solid wastes, the format for Table 3 in Appendix B shall be supplemented with three additional categories: class of solid waste (as defined by 10 CFR Part 61), type of container (e.g., LSA, Type A, Type B, Large Quantity), and SOLIDIFICATION agent or absorbent (e.g., cement, urea formaldehyde).

The ARERR shall also include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, and atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.<sup>2</sup>

This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the Unit or Station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. Historical average meteorological conditions or the meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

---

<sup>2</sup> In lieu of submission with the ARERR, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

ATTACHMENT A  
(Page 69 of 152)

## OFFSITE DOSE CALCULATION MANUAL

The ARERR shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operation." Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

The ARERR shall include a list and description, including total Curies, of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The ARERR shall include any changes made during the reporting period to the ODCM, pursuant to Technical Specification 5.5.1.

The ARERR shall include major changes to the Radwaste Treatment Systems for the period in which the evaluation was reviewed and accepted by the PSRC. The discussion of each change shall contain:

1. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
2. Sufficient detailed information to totally support the reason for the change without benefit of additional and supplemental information;
3. A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems.
4. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
5. An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
6. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;

ATTACHMENT A  
(Page 70 of 152)

## OFFSITE DOSE CALCULATION MANUAL

7. An estimate of the exposure to plant operating personnel as a result of the change; and
8. Documentation of the fact that the change was reviewed and found acceptable by the PSRC.

The ARERR shall include a listing of new locations for dose calculations identified by the Land Use Census.

The ARERR shall include a description of the events leading to liquid holdup tanks or gas storage tanks exceeding the limits of TR 3.10.1 OR TSR 3.10.3.1.

The ARERR shall include an explanation as to why the nonfunctionality of a liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified.

The ARERR shall include a description of the events leading to a missed sample required by Table 2-1 or 3-1.

The ARERR shall include NEI Groundwater Protection Initiative requirements (Ref. 3.1.6)

1. A report of onsite groundwater sample results.
2. A description of dose calculations for releases from site.
3. A summary of onsite spills & leaks that require notification to county, state & NRC.

ATTACHMENT A  
(Page 71 of 152)

OFFSITE DOSE CALCULATION MANUAL

**APPENDIX A**

Dose Conversion Factor Tables



ATTACHMENT A  
(Page 72 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE A.1-1\***  
BIOACCUMULATION FACTORS TO BE USED IN  
THE ABSENCE OF SITE-SPECIFIED DATA  
(pCi/kg per pCi/liter)

ELEMENT	FRESHWATER FISH
H	9.0E-01
C	4.6E 03
Na	1.0E 02
P	1.0E 05
Cr	2.0E 02
Mn	4.0E 02
Fe	1.0E 02
Co	5.0E 01
Ni	1.0E 02
Cu	5.0E 01
Zn	2.0E 03
Br	4.2E 02
Rb	2.0E 03
Sr	3.0E 01
Y	2.5E 01
Zr	3.3E 00
Nb	3.0E 04
Mo	1.0E 01
Tc	1.5E 01
Ru	1.0E 01
Rh	1.0E 01
Te	4.0E 02
I	1.5E 01
Cs	2.0E 03
Ba	4.0E 00
La	2.5E 01
Ce	1.0E 00
Pr	2.5E 01
Nd	2.5E 01
W	1.2E 03
Np	1.0E 01
**Ag	2.3E 00
**Sb	1.0E 00

\* Taken from Regulatory Guide 1.109 (Rev.1)

\*\* Taken from Regulatory Guide 1.109 (Rev.0)

ATTACHMENT A  
(Page 73 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.1-2**

DOSE FACTORS FOR NOBLE GASES AND DAUGHTERS\*

<u>Radionuclide</u>	<u>Total Body Dose Factor</u> $\frac{K_i}{(\text{mrem/yr per } \mu\text{Ci/m}^3)}$	<u>Skin Dose Factor</u> $\frac{L_i}{(\text{mrem/yr per } \mu\text{Ci/m}^3)}$	<u>Gamma Air Dose Factor</u> $\frac{M_i}{(\text{mrad/yr per } \mu\text{Ci/m}^3)}$	<u>Beta Air Dose Factor</u> $\frac{N_i}{(\text{mrad/yr per } \mu\text{Ci/m}^3)}$
Kr-83M	7.56E-02**	---	1.93E+01	2.88E+02
Kr-85M	1.17E+03	1.46E+03	1.23E+03	1.97E+03
Kr-85	1.61E+01	1.34E+03	1.72E+01	1.95E+03
Kr-87	5.92E+03	9.73E+03	6.17E+03	1.03E+04
Kr-88	1.47E+04	2.37E+03	1.52E+04	2.93E+03
Kr-89	1.66E+04	1.01E+04	1.73E+04	1.06E+04
Kr-90	1.56E+04	7.29E+03	1.63E+04	7.83E+03
Xe-131M	9.15E+01	4.76E+02	1.56E+02	1.11E+03
Xe-133	2.94E+02	3.06E+02	3.53E+02	1.05E+03
Xe-133M	2.51E+02	9.94E+02	3.27E+02	1.48E+03
Xe-135M	3.12E+03	7.11E+02	3.36E+03	7.39E+02
Xe-135	1.81E+03	1.86E+03	1.92E+03	2.46E+03
Xe-137	1.42E+03	1.22E+04	1.51E+03	1.27E+04
Xe-138	8.83E+03	4.13E+03	9.21E+03	4.75E+03
Ar-41	8.84E+03	2.69E+03	9.30E+03	3.28E+03

\*Based on Regulatory Guide 1.109 (Rev.1)

\*\*7.56E-02 = 7.56 x 10<sup>-2</sup>

ATTACHMENT A  
(Page 74 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.2-1\*  
INHALATION DOSE FACTORS FOR ADULTS  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	1.58E-07	1.58E-07	1.58E-07	1.58E-07	1.58E-07	1.58E-07
C	14	2.27E-06	4.26E-07	4.26E-07	4.26E-07	4.26E-07	4.26E-07	4.26E-07
NA	24	1.28E-06	1.28E-06	1.28E-06	1.28E-06	1.28E-06	1.28E-06	1.28E-06
P	32	1.65E-04	9.64E-06	6.26E-06	NO DATA	NO DATA	NO DATA	1.08E-05
CR	51	NO DATA	NO DATA	1.25E-08	7.44E-09	2.85E-09	1.80E-06	4.15E-07
MN	54	NO DATA	4.95E-06	7.87E-07	NO DATA	1.23E-06	1.75E-04	9.67E-06
MN	56	NO DATA	1.55E-10	2.29E-11	NO DATA	1.63E-10	1.18E-06	2.53E-06
FE	55	3.07E-06	2.12E-06	4.93E-07	NO DATA	NO DATA	9.01E-06	7.54E-07
FE	59	1.47E-06	3.47E-06	1.32E-06	NO DATA	NO DATA	1.27E-04	2.35E-05
CO	58	NO DATA	1.98E-07	2.59E-07	NO DATA	NO DATA	1.16E-04	1.33E-05
CO	60	NO DATA	1.44E-06	1.85E-06	NO DATA	NO DATA	7.46E-04	3.56E-05
NI	63	5.40E-05	3.93E-06	1.81E-06	NO DATA	NO DATA	2.23E-05	1.67E-06
NI	65	1.92E-10	2.62E-11	1.14E-11	NO DATA	NO DATA	7.00E-07	1.54E-06
CU	64	NO DATA	1.83E-10	7.69E-11	NO DATA	5.78E-10	8.48E-07	6.12E-06
ZN	65	4.05E-06	1.29E-05	5.82E-06	NO DATA	8.62E-06	1.08E-04	6.68E-06
ZN	69	4.23E-12	8.14E-12	5.65E-13	NO DATA	5.27E-12	1.15E-07	2.04E-09
BR	83	NO DATA	NO DATA	3.01E-08	NO DATA	NO DATA	NO DATA	2.90E-08
BR	84	NO DATA	NO DATA	3.91E-08	NO DATA	NO DATA	NO DATA	2.05E-13
BR	85	NO DATA	NO DATA	1.60E-09	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	1.69E-05	7.37E-06	NO DATA	NO DATA	NO DATA	2.08E-06
RB	88	NO DATA	4.84E-08	2.41E-08	NO DATA	NO DATA	NO DATA	4.18E-19
RB	89	NO DATA	3.20E-08	2.12E-08	NO DATA	NO DATA	NO DATA	1.16E-21
SR	89	3.80E-05	NO DATA	1.09E-06	NO DATA	NO DATA	1.75E-04	4.37E-05
SR	90	1.24E-02	NO DATA	7.62E-04	NO DATA	NO DATA	1.20E-03	9.02E-05
SR	91	7.74E-09	NO DATA	3.13E-10	NO DATA	NO DATA	4.56E-06	2.39E-05
SR	92	8.43E-10	NO DATA	3.64E-11	NO DATA	NO DATA	2.06E-06	5.38E-06
Y	90	2.61E-07	NO DATA	7.01E-09	NO DATA	NO DATA	2.12E-05	6.32E-05
Y	91M	3.26E-11	NO DATA	1.27E-12	NO DATA	NO DATA	2.40E-07	1.66E-10
Y	91	5.78E-05	NO DATA	1.55E-06	NO DATA	NO DATA	2.13E-04	4.81E-05
Y	92	1.29E-09	NO DATA	3.77E-11	NO DATA	NO DATA	1.96E-06	9.19E-06
Y	93	1.18E-08	NO DATA	3.26E-10	NO DATA	NO DATA	6.06E-06	5.27E-05
ZR	95	1.34E-05	4.30E-06	2.91E-06	NO DATA	6.77E-06	2.21E-04	1.88E-05
ZR	97	1.21E-08	2.45E-09	1.13E-09	NO DATA	3.71E-09	9.84E-06	6.54E-05
NB	95	1.76E-06	9.77E-07	5.26E-07	NO DATA	9.67E-07	6.31E-05	1.30E-05
MO	99	NO DATA	1.51E-08	2.87E-09	NO DATA	3.64E-08	1.14E-05	3.10E-05
TC	99M	1.29E-13	3.64E-13	4.63E-12	NO DATA	5.52E-12	9.55E-08	5.20E-07

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 75 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.2-1\*(cont'd)**  
INHALATION DOSE FACTORS FOR ADULTS  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	5.22E-15	7.52E-15	7.38E-14	NO DATA	1.35E-13	4.99E-08	1.36E-21
RU	103	1.91E-07	NO DATA	8.23E-08	NO DATA	7.29E-07	6.31E-05	1.38E-05
RU	105	9.88E-11	NO DATA	3.89E-11	NO DATA	1.27E-10	1.37E-06	6.02E-06
RU	106	8.64E-06	NO DATA	1.09E-06	NO DATA	1.67E-05	1.17E-03	1.14E-04
AG	110M	1.35E-06	1.25E-06	7.43E-07	NO DATA	2.46E-06	5.79E-04	3.78E-05
TE	125M	4.27E-07	1.98E-07	5.84E-08	1.31E-07	1.55E-06	3.92E-05	8.83E-06
TE	127M	1.58E-06	7.21E-07	1.96E-07	4.11E-07	5.72E-06	1.20E-04	1.87E-05
TE	127	1.75E-10	8.03E-11	3.87E-11	1.32E-10	6.37E-10	8.14E-07	7.17E-06
TE	129M	1.22E-06	5.84E-07	1.98E-07	4.30E-07	4.57E-06	1.45E-04	4.79E-05
TE	129	6.22E-12	2.99E-12	1.55E-12	4.87E-12	2.34E-11	2.42E-07	1.96E-08
TE	131M	8.74E-09	5.45E-09	3.63E-09	6.88E-09	3.86E-08	1.82E-05	6.95E-05
TE	131	1.39E-12	7.44E-13	4.49E-13	1.17E-12	5.46E-12	1.74E-07	2.30E-09
TE	132	3.25E-08	2.69E-08	2.02E-08	2.37E-08	1.82E-07	3.60E-05	6.37E-05
I	130	5.72E-07	1.68E-06	6.60E-07	1.42E-04	2.61E-06	NO DATA	9.61E-07
I	131	3.15E-06	4.47E-06	2.56E-06	1.49E-03	7.66E-06	NO DATA	7.85E-07
I	132	1.45E-07	4.07E-07	1.45E-07	1.43E-05	6.48E-07	NO DATA	5.08E-08
I	133	1.08E-06	1.85E-06	5.65E-07	2.69E-04	3.23E-06	NO DATA	1.11E-06
I	134	8.05E-08	2.16E-07	7.69E-08	3.73E-06	3.44E-07	NO DATA	1.26E-10
I	135	3.35E-07	8.73E-07	3.21E-07	5.60E-05	1.39E-06	NO DATA	6.56E-07
CS	134	4.66E-05	1.06E-04	9.10E-05	NO DATA	3.59E-05	1.22E-05	1.30E-06
CS	136	4.88E-06	1.83E-05	1.38E-05	NO DATA	1.07E-05	1.50E-06	1.46E-06
CS	137	5.98E-05	7.76E-05	5.35E-05	NO DATA	2.78E-05	9.40E-06	1.05E-06
CS	138	4.14E-08	7.76E-08	4.05E-08	NO DATA	6.00E-08	6.07E-09	2.33E-13
BA	139	1.17E-10	8.32E-14	3.42E-12	NO DATA	7.78E-14	4.70E-07	1.12E-07
BA	140	4.88E-06	6.13E-09	3.21E-07	NO DATA	2.09E-09	1.59E-04	2.73E-05
BA	141	1.25E-11	9.41E-15	4.20E-13	NO DATA	8.75E-15	2.42E-07	1.45E-17
BA	142	3.29E-12	3.38E-15	2.07E-13	NO DATA	2.86E-15	1.49E-07	1.96E-26
LA	140	4.30E-08	2.17E-08	5.73E-09	NO DATA	NO DATA	1.70E-05	5.73E-05
LA	142	8.54E-11	3.88E-11	9.65E-12	NO DATA	NO DATA	7.91E-07	2.64E-07
CE	141	2.49E-06	1.69E-06	1.91E-07	NO DATA	7.83E-07	4.52E-05	1.50E-05
CE	143	2.33E-08	1.72E-08	1.91E-09	NO DATA	7.60E-09	9.97E-06	2.83E-05
CE	144	4.29E-04	1.79E-04	2.30E-05	NO DATA	1.06E-04	9.72E-04	1.02E-04
PR	143	1.17E-06	4.69E-07	5.80E-08	NO DATA	2.70E-07	3.51E-05	2.50E-05
PR	144	3.76E-12	1.56E-12	1.91E-13	NO DATA	8.81E-13	1.27E-07	2.69E-18
ND	147	6.59E-07	7.62E-07	4.56E-08	NO DATA	4.45E-07	2.76E-05	2.16E-05
W	187	1.06E-09	8.85E-10	3.10E-10	NO DATA	NO DATA	3.63E-06	1.94E-05
NP	239	2.87E-08	2.82E-09	1.55E-09	NO DATA	8.75E-09	4.70E-06	1.49E-05

ATTACHMENT A  
(Page 76 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.2-2\*  
INHALATION DOSE FACTORS FOR TEENAGER  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	1.59E-07	1.59E-07	1.59E-07	1.59E-07	1.59E-07	1.59E-07
C	14	3.25E-06	6.09E-07	6.09E-07	6.09E-07	6.09E-07	6.09E-07	6.09E-07
NA	24	1.72E-06	1.72E-06	1.72E-06	1.72E-06	1.72E-06	1.72E-06	1.72E-06
P	32	2.36E-04	1.37E-05	8.95E-06	NO DATA	NO DATA	NO DATA	1.16E-05
CR	51	NO DATA	NO DATA	1.69E-08	9.37E-09	3.84E-09	2.62E-06	3.75E-07
MN	54	NO DATA	6.39E-06	1.05E-06	NO DATA	1.59E-06	2.48E-04	8.35E-06
MN	56	NO DATA	2.12E-10	3.15E-11	NO DATA	2.24E-10	1.90E-06	7.18E-06
FE	55	4.18E-06	2.98E-06	6.93E-07	NO DATA	NO DATA	1.55E-05	7.99E-07
FE	59	1.99E-06	4.62E-06	1.79E-06	NO DATA	NO DATA	1.91E-04	2.23E-05
CO	58	NO DATA	2.59E-07	3.47E-07	NO DATA	NO DATA	1.68E-04	1.19E-05
CO	60	NO DATA	1.89E-06	2.48E-06	NO DATA	NO DATA	1.09E-03	3.24E-05
NI	63	7.25E-05	5.43E-06	2.47E-06	NO DATA	NO DATA	3.84E-05	1.77E-06
NI	65	2.73E-10	3.66E-11	1.59E-11	NO DATA	NO DATA	1.17E-06	4.59E-06
CU	64	NO DATA	2.54E-10	1.06E-10	NO DATA	8.01E-10	1.39E-06	7.68E-06
ZN	65	4.82E-06	1.67E-05	7.80E-06	NO DATA	1.08E-05	1.55E-04	5.83E-06
ZN	69	6.04E-12	1.15E-11	8.07E-13	NO DATA	7.53E-12	1.98E-07	3.56E-08
BR	83	NO DATA	NO DATA	4.30E-08	NO DATA	NO DATA	NO DATA	LT E-24
BR	84	NO DATA	NO DATA	5.41E-08	NO DATA	NO DATA	NO DATA	LT E-24
BR	85	NO DATA	NO DATA	2.29E-09	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	2.38E-05	1.05E-05	NO DATA	NO DATA	NO DATA	2.21E-06
RB	88	NO DATA	6.82E-08	3.40E-08	NO DATA	NO DATA	NO DATA	3.65E-15
RB	89	NO DATA	4.40E-08	2.91E-08	NO DATA	NO DATA	NO DATA	4.22E-17
SR	89	5.43E-05	NO DATA	1.56E-06	NO DATA	NO DATA	3.02E-04	4.64E-05
SR	90	1.35E-02	NO DATA	8.35E-04	NO DATA	NO DATA	2.06E-03	9.56E-05
SR	91	1.10E-08	NO DATA	4.39E-10	NO DATA	NO DATA	7.59E-06	3.24E-05
SR	92	1.19E-09	NO DATA	5.08E-11	NO DATA	NO DATA	3.43E-06	1.49E-05
Y	90	3.73E-07	NO DATA	1.00E-08	NO DATA	NO DATA	3.66E-05	6.99E-05
Y	91M	4.63E-11	NO DATA	1.77E-12	NO DATA	NO DATA	4.00E-07	3.77E-09
Y	91	8.26E-05	NO DATA	2.21E-06	NO DATA	NO DATA	3.67E-04	5.11E-05
Y	92	1.84E-09	NO DATA	5.36E-11	NO DATA	NO DATA	3.35E-06	2.06E-05
Y	93	1.69E-08	NO DATA	4.65E-10	NO DATA	NO DATA	1.04E-05	7.24E-05
ZR	95	1.82E-05	5.73E-06	3.94E-06	NO DATA	8.42E-06	3.36E-04	1.86E-05
ZR	97	1.72E-08	3.40E-09	1.57E-09	NO DATA	5.15E-09	1.62E-05	7.88E-05
NB	95	2.32E-06	1.29E-06	7.08E-07	NO DATA	1.25E-06	9.39E-05	1.21E-05
MO	99	NO DATA	2.11E-08	4.03E-09	NO DATA	5.14E-08	1.92E-05	3.36E-05
TC	99M	1.73E-13	4.83E-13	6.24E-12	NO DATA	7.20E-12	1.44E-07	7.66E-07

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 77 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.2-2\* (cont'd)**  
INHALATION DOSE FACTORS FOR TEENAGER  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	7.40E-15	1.05E-14	1.03E-13	NO DATA	1.90E-13	8.34E-08	1.09E-16
RU	103	2.63E-07	NO DATA	1.12E-07	NO DATA	9.29E-07	9.79E-05	1.36E-05
RU	105	1.40E-10	NO DATA	5.42E-11	NO DATA	1.76E-10	2.27E-06	1.13E-05
RU	106	1.23E-05	NO DATA	1.55E-06	NO DATA	2.38E-05	2.01E-03	1.20E-04
AG	110M	1.73E-06	1.64E-06	9.99E-07	NO DATA	3.13E-06	8.44E-04	3.41E-05
TE	125M	6.10E-07	2.80E-07	8.34E-08	1.75E-07	NO DATA	6.70E-05	9.38E-06
TE	127M	2.25E-06	1.02E-06	2.73E-07	5.48E-07	8.17E-06	2.07E-04	1.99E-05
TE	127	2.51E-10	1.14E-10	5.52E-11	1.77E-10	9.10E-10	1.40E-06	1.01E-05
TE	129M	1.74E-06	8.23E-07	2.81E-07	5.72E-07	6.49E-06	2.47E-04	5.06E-05
TE	129	8.87E-12	4.22E-12	2.20E-12	6.48E-12	3.32E-11	4.12E-07	2.02E-07
TE	131M	1.23E-08	7.51E-09	5.03E-09	9.06E-09	5.49E-08	2.97E-05	7.76E-05
TE	131	1.97E-12	1.04E-12	6.30E-13	1.55E-12	7.72E-12	2.92E-07	1.89E-09
TE	132	4.50E-08	3.63E-08	2.74E-08	3.07E-08	2.44E-07	5.61E-05	5.79E-05
I	130	7.80E-07	2.24E-06	8.96E-07	1.86E-04	3.44E-06	NO DATA	1.14E-06
I	131	4.43E-06	6.14E-06	3.30E-06	1.83E-03	1.05E-05	NO DATA	8.11E-07
I	132	1.99E-07	5.47E-07	1.97E-07	1.89E-05	8.65E-07	NO DATA	1.59E-07
I	133	1.52E-06	2.56E-06	7.78E-07	3.65E-04	4.49E-06	NO DATA	1.29E-06
I	134	1.11E-07	2.90E-07	1.05E-07	4.94E-06	4.58E-07	NO DATA	2.55E-09
I	135	4.62E-07	1.18E-06	4.36E-07	7.76E-05	1.86E-06	NO DATA	8.69E-07
CS	134	6.28E-05	1.41E-04	6.86E-05	NO DATA	4.69E-05	1.83E-05	1.22E-06
CS	136	6.44E-06	2.42E-05	1.71E-05	NO DATA	1.38E-05	2.22E-06	1.36E-06
CS	137	8.38E-05	1.06E-04	3.89E-05	NO DATA	3.80E-05	1.51E-05	1.06E-06
CS	138	5.82E-08	1.07E-07	5.58E-08	NO DATA	8.28E-08	9.84E-09	3.38E-11
BA	139	1.67E-10	1.18E-13	4.87E-12	NO DATA	1.11E-13	8.08E-07	8.06E-07
BA	140	6.84E-06	8.38E-09	4.40E-07	NO DATA	2.85E-09	2.54E-04	2.86E-05
BA	141	1.78E-11	1.32E-14	5.93E-13	NO DATA	1.23E-14	4.11E-07	9.33E-14
BA	142	4.62E-12	4.63E-15	2.84E-13	NO DATA	3.92E-15	2.39E-07	5.99E-20
LA	140	5.99E-08	2.95E-08	7.82E-09	NO DATA	NO DATA	2.68E-05	6.09E-05
LA	142	1.20E-10	5.31E-11	1.32E-11	NO DATA	NO DATA	1.27E-06	1.50E-06
CE	141	3.55E-06	2.37E-06	2.71E-07	NO DATA	1.11E-06	7.67E-05	1.58E-05
CE	143	3.32E-08	2.42E-08	2.70E-09	NO DATA	1.08E-08	1.63E-05	3.19E-05
CE	144	6.11E-04	2.53E-04	3.28E-05	NO DATA	1.51E-04	1.67E-03	1.08E-04
PR	143	1.67E-06	6.64E-07	8.28E-08	NO DATA	3.86E-07	6.04E-05	2.67E-05
PR	144	5.37E-12	2.20E-12	2.72E-13	NO DATA	1.26E-12	2.19E-07	2.94E-14
ND	147	9.83E-07	1.07E-06	6.41E-08	NO DATA	6.28E-07	4.65E-05	2.28E-05
W	187	1.50E-09	1.22E-09	4.29E-10	NO DATA	NO DATA	5.92E-06	2.21E-05
NP	239	4.23E-08	3.99E-09	2.21E-09	NO DATA	1.25E-08	8.11E-06	1.65E-05

ATTACHMENT A  
(Page 78 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.2-3\***  
INHALATION DOSE FACTORS FOR CHILD.  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	3.04E-07	3.04E-07	3.04E-07	3.04E-07	3.04E-07	3.04E-07
C	14	9.70E-06	1.82E-06	1.82E-06	1.82E-06	1.82E-06	1.82E-06	1.82E-06
NA	24	4.35E-06	4.35E-06	4.35E-06	4.35E-06	4.35E-06	4.35E-06	4.35E-06
P	32	7.04E-04	3.09E-05	2.67E-05	NO DATA	NO DATA	NO DATA	1.14E-05
CR	51	NO DATA	NO DATA	4.17E-08	2.31E-08	6.57E-09	4.59E-06	2.93E-07
MN	54	NO DATA	1.16E-05	2.57E-06	NO DATA	2.71E-06	4.26E-04	6.19E-06
MN	56	NO DATA	4.48E-10	8.43E-11	NO DATA	4.52E-10	3.55E-06	3.33E-05
FE	55	1.28E-05	6.80E-06	2.10E-06	NO DATA	NO DATA	3.00E-05	7.75E-07
FE	59	5.59E-06	9.04E-06	4.51E-06	NO DATA	NO DATA	3.43E-04	1.91E-05
CO	58	NO DATA	4.79E-07	8.55E-07	NO DATA	NO DATA	2.99E-04	9.29E-06
CO	60	NO DATA	3.55E-06	6.12E-06	NO DATA	NO DATA	1.91E-03	2.60E-05
NI	63	2.22E-04	1.25E-05	7.56E-06	NO DATA	NO DATA	7.43E-05	1.71E-06
NI	65	8.08E-10	7.99E-11	4.44E-11	NO DATA	NO DATA	2.21E-06	2.27E-05
CU	64	NO DATA	5.39E-10	2.90E-10	NO DATA	1.63E-09	2.59E-06	9.92E-06
ZN	65	1.15E-05	3.06E-05	1.90E-05	NO DATA	1.93E-05	2.69E-04	4.41E-06
ZN	69	1.81E-11	2.61E-11	2.41E-12	NO DATA	1.58E-11	3.84E-07	2.75E-06
BR	83	NO DATA	NO DATA	1.28E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	84	NO DATA	NO DATA	1.48E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	85	NO DATA	NO DATA	6.84E-09	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	5.36E-05	3.09E-05	NO DATA	NO DATA	NO DATA	2.16E-06
RB	88	NO DATA	1.52E-07	9.90E-08	NO DATA	NO DATA	NO DATA	4.66E-09
RB	89	NO DATA	9.33E-08	7.83E-08	NO DATA	NO DATA	NO DATA	5.11E-10
SR	89	1.62E-04	NO DATA	4.66E-06	NO DATA	NO DATA	5.83E-04	4.52E-05
SR	90	2.73E-02	NO DATA	1.74E-03	NO DATA	NO DATA	3.99E-03	9.28E-05
SR	91	3.28E-08	NO DATA	1.24E-09	NO DATA	NO DATA	1.44E-05	4.70E-05
SR	92	3.54E-09	NO DATA	1.42E-10	NO DATA	NO DATA	6.49E-06	6.55E-05
Y	90	1.11E-06	NO DATA	2.99E-08	NO DATA	NO DATA	7.07E-05	7.24E-05
Y	91M	1.37E-10	NO DATA	4.98E-12	NO DATA	NO DATA	7.60E-07	4.64E-07
Y	91	2.47E-04	NO DATA	6.59E-06	NO DATA	NO DATA	7.10E-04	4.97E-05
Y	92	5.50E-09	NO DATA	1.57E-10	NO DATA	NO DATA	6.46E-06	6.46E-05
Y	93	5.04E-08	NO DATA	1.38E-09	NO DATA	NO DATA	2.01E-05	1.05E-04
ZR	95	5.13E-05	1.13E-05	1.00E-05	NO DATA	1.61E-05	6.03E-04	1.65E-05
ZR	97	5.07E-08	7.34E-09	4.32E-09	NO DATA	1.05E-08	3.06E-05	9.49E-05
NB	95	6.35E-06	2.48E-06	1.77E-06	NO DATA	2.33E-06	1.66E-04	1.00E-05
MO	99	NO DATA	4.66E-08	1.15E-08	NO DATA	1.06E-07	3.66E-05	3.42E-05
TC	99M	4.81E-13	9.41E-13	1.56E-11	NO DATA	1.37E-11	2.57E-07	1.30E-06

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 79 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.2-3\* (cont'd)  
INHALATION DOSE FACTORS FOR CHILD  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	2.19E-14	2.30E-14	2.91E-13	NO DATA	3.92E-13	1.58E-07	4.41E-09
RU	103	7.55E-07	NO DATA	2.90E-07	NO DATA	1.90E-06	1.79E-04	1.21E-05
RU	105	4.13E-10	NO DATA	1.50E-10	NO DATA	3.63E-10	4.30E-06	2.69E-05
RU	106	3.68E-05	NO DATA	4.57E-06	NO DATA	4.97E-05	3.87E-03	1.16E-04
AG	110M	4.56E-06	3.08E-06	2.47E-06	NO DATA	5.74E-06	1.48E-03	2.71E-05
TE	125M	1.82E-06	6.29E-07	2.47E-07	5.20E-07	NO DATA	1.29E-04	9.13E-06
TE	127M	6.72E-06	2.31E-06	8.16E-07	1.64E-06	1.72E-05	4.00E-04	1.93E-05
TE	127	7.49E-10	2.57E-10	1.65E-10	5.30E-10	1.91E-09	2.71E-06	1.52E-05
TE	129M	5.19E-06	1.85E-06	8.22E-07	1.71E-06	1.36E-05	4.76E-04	4.91E-05
TE	129	2.64E-11	9.45E-12	6.44E-12	1.93E-11	6.94E-11	7.93E-07	6.89E-06
TE	131M	3.63E-08	1.60E-08	1.37E-08	2.64E-08	1.08E-07	5.56E-05	8.32E-05
TE	131	5.87E-12	2.28E-12	1.78E-12	4.59E-12	1.59E-11	5.55E-07	3.60E-07
TE	132	1.30E-07	7.36E-08	7.12E-08	8.58E-08	4.79E-07	1.02E-04	3.72E-05
I	130	2.21E-06	4.43E-06	2.28E-06	4.99E-04	6.61E-06	NO DATA	1.38E-06
I	131	1.30E-05	1.30E-05	7.37E-06	4.39E-03	2.13E-05	NO DATA	7.68E-07
I	132	5.72E-07	1.10E-06	5.07E-07	5.23E-05	1.69E-06	NO DATA	8.65E-07
I	133	4.48E-06	5.49E-06	2.08E-06	1.04E-03	9.13E-06	NO DATA	1.48E-06
I	134	3.17E-07	5.84E-07	2.69E-07	1.37E-05	8.92E-07	NO DATA	2.58E-07
I	135	1.33E-06	2.36E-06	1.12E-06	2.14E-04	3.62E-06	NO DATA	1.20E-06
CS	134	1.76E-04	2.74E-04	6.07E-05	NO DATA	8.93E-05	3.27E-05	1.04E-06
CS	136	1.76E-05	4.62E-05	3.14E-05	NO DATA	2.58E-05	3.93E-06	1.13E-06
CS	137	2.45E-04	2.23E-04	3.47E-05	NO DATA	7.63E-05	2.81E-05	9.78E-07
CS	138	1.71E-07	2.27E-07	1.50E-07	NO DATA	1.68E-07	1.84E-08	7.29E-08
BA	139	4.98E-10	2.66E-13	1.45E-11	NO DATA	2.33E-13	1.56E-06	1.56E-05
BA	140	2.00E-05	1.75E-08	1.17E-06	NO DATA	5.71E-09	4.71E-04	2.75E-05
BA	141	5.29E-11	2.95E-14	1.72E-12	NO DATA	2.56E-14	7.89E-07	7.44E-08
BA	142	1.35E-11	9.73E-15	7.54E-13	NO DATA	7.87E-15	4.44E-07	7.41E-10
LA	140	1.74E-07	6.08E-08	2.04E-08	NO DATA	NO DATA	4.94E-05	6.10E-05
LA	142	3.50E-10	1.11E-10	3.49E-11	NO DATA	NO DATA	2.35E-06	2.05E-05
CE	141	1.06E-05	5.28E-06	7.83E-07	NO DATA	2.31E-06	1.47E-04	1.53E-05
CE	143	9.89E-08	5.37E-08	7.77E-09	NO DATA	2.26E-08	3.12E-05	3.44E-05
CE	144	1.83E-03	5.72E-04	9.77E-05	NO DATA	3.17E-04	3.23E-03	1.05E-04
PR	143	4.99E-06	1.50E-06	2.47E-07	NO DATA	8.11E-07	1.17E-04	2.63E-05
PR	144	1.61E-11	4.99E-12	8.10E-13	NO DATA	2.64E-12	4.23E-07	5.32E-08
ND	147	2.92E-06	2.36E-06	1.84E-07	NO DATA	1.30E-06	8.87E-05	2.22E-05
W	187	4.41E-09	2.61E-09	1.17E-09	NO DATA	NO DATA	1.11E-05	2.46E-05
NP	239	1.26E-07	9.04E-09	6.35E-09	NO DATA	2.63E-08	1.57E-05	1.73E-05



ATTACHMENT A  
(Page 80 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.2-4\*  
INHALATION DOSE FACTORS FOR INFANT  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	4.62E-07	4.62E-07	4.62E-07	4.62E-07	4.62E-07	4.62E-07
C	14	1.89E-05	3.79E-06	3.79E-06	3.79E-06	3.79E-06	3.79E-06	3.79E-06
NA	24	7.54E-06	7.54E-06	7.54E-06	7.54E-06	7.54E-06	7.54E-06	7.54E-06
P	32	1.45E-03	8.03E-05	5.53E-05	NO DATA	NO DATA	NO DATA	1.15E-05
CR	51	NO DATA	NO DATA	6.39E-08	4.11E-08	9.45E-09	9.17E-06	2.55E-07
MN	54	NO DATA	1.81E-05	3.56E-06	NO DATA	3.56E-06	7.14E-04	5.04E-06
MN	56	NO DATA	1.10E-09	1.58E-10	NO DATA	7.86E-10	8.95E-06	5.12E-05
FE	55	1.41E-05	8.39E-06	2.38E-06	NO DATA	NO DATA	6.21E-05	7.82E-07
FE	59	9.69E-06	1.68E-05	6.77E-06	NO DATA	NO DATA	7.25E-04	1.77E-05
CO	58	NO DATA	8.71E-07	1.30E-06	NO DATA	NO DATA	5.55E-04	7.95E-06
CO	60	NO DATA	5.73E-06	8.41E-06	NO DATA	NO DATA	3.22E-03	2.28E-05
NI	63	2.42E-04	1.46E-05	8.29E-06	NO DATA	NO DATA	1.49E-04	1.73E-06
NI	65	1.71E-09	2.03E-10	8.79E-11	NO DATA	NO DATA	5.80E-06	3.58E-05
CU	64	NO DATA	1.34E-09	5.53E-10	NO DATA	2.84E-09	6.64E-06	1.07E-05
ZN	65	1.38E-05	4.47E-05	2.22E-05	NO DATA	2.32E-05	4.62E-04	3.67E-05
ZN	69	3.85E-11	6.91E-11	5.13E-12	NO DATA	2.87E-11	1.05E-06	9.44E-06
BR	83	NO DATA	NO DATA	2.72E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	84	NO DATA	NO DATA	2.86E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	85	NO DATA	NO DATA	1.46E-08	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	1.36E-04	6.30E-05	NO DATA	NO DATA	NO DATA	2.17E-06
RB	88	NO DATA	3.98E-07	2.05E-07	NO DATA	NO DATA	NO DATA	2.42E-07
RB	89	NO DATA	2.29E-07	1.47E-07	NO DATA	NO DATA	NO DATA	4.87E-08
SR	89	2.84E-04	NO DATA	8.15E-06	NO DATA	NO DATA	1.45E-03	4.57E-05
SR	90	2.92E-02	NO DATA	1.85E-03	NO DATA	NO DATA	8.03E-03	9.36E-05
SR	91	6.83E-08	NO DATA	2.47E-09	NO DATA	NO DATA	3.76E-05	5.24E-05
SR	92	7.50E-09	NO DATA	2.79E-10	NO DATA	NO DATA	1.70E-05	1.00E-04
Y	90	2.35E-06	NO DATA	6.30E-08	NO DATA	NO DATA	1.92E-04	7.43E-05
Y	91M	2.91E-10	NO DATA	9.90E-12	NO DATA	NO DATA	1.99E-06	1.68E-06
Y	91	4.20E-04	NO DATA	1.12E-05	NO DATA	NO DATA	1.75E-03	5.02E-05
Y	92	1.17E-08	NO DATA	3.29E-10	NO DATA	NO DATA	1.75E-05	9.04E-05
Y	93	1.07E-07	NO DATA	2.91E-09	NO DATA	NO DATA	5.46E-05	1.19E-04
ZR	95	8.24E-05	1.99E-05	1.45E-05	NO DATA	2.22E-05	1.25E-03	1.55E-05
ZR	97	1.07E-07	1.83E-08	8.36E-09	NO DATA	1.85E-08	7.88E-05	1.00E-04
NB	95	1.12E-05	4.59E-06	2.70E-06	NO DATA	3.37E-06	3.42E-04	9.05E-06
MO	99	NO DATA	1.18E-07	2.31E-08	NO DATA	1.89E-07	9.63E-05	3.48E-05
TC	99M	9.98E-13	2.06E-12	2.66E-11	NO DATA	2.22E-11	5.79E-07	1.45E-06

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 81 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.2-4\* (cont'd)**  
INHALATION DOSE FACTORS FOR INFANT  
(MREM PER PCI INHALED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	4.65E-14	5.88E-14	5.80E-13	NO DATA	6.99E-13	4.17E-07	6.03E-07
RU	103	1.44E-06	NO DATA	4.85E-07	NO DATA	3.03E-06	3.94E-04	1.15E-05
RU	105	8.74E-10	NO DATA	2.93E-10	NO DATA	6.42E-10	1.12E-05	3.46E-05
RU	106	6.20E-05	NO DATA	7.77E-06	NO DATA	7.61E-05	8.26E-03	1.17E-04
AG	110M	7.13E-06	5.16E-06	3.57E-06	NO DATA	7.80E-06	2.62E-03	2.36E-05
TE	125M	3.40E-06	1.42E-06	4.70E-07	1.16E-06	NO DATA	3.19E-04	9.22E-06
TE	127M	1.19E-05	4.93E-06	1.48E-06	3.48E-06	2.68E-05	9.37E-04	1.95E-05
TE	127	1.59E-09	6.81E-10	3.49E-10	1.32E-09	3.47E-09	7.39E-06	1.74E-05
TE	129M	1.01E-05	4.35E-06	1.59E-06	3.91E-06	2.27E-05	1.20E-03	4.93E-05
TE	129	5.63E-11	2.48E-11	1.34E-11	4.82E-11	1.25E-10	2.14E-06	1.88E-05
TE	131M	7.62E-08	3.93E-08	2.59E-08	6.38E-08	1.89E-07	1.42E-04	8.51E-05
TE	131	1.24E-11	5.87E-12	3.57E-12	1.13E-11	2.85E-11	1.47E-06	5.87E-06
TE	132	2.66E-07	1.69E-07	1.26E-07	1.99E-07	7.39E-07	2.43E-04	3.15E-05
I	130	4.54E-06	9.91E-06	3.98E-06	1.14E-03	1.09E-05	NO DATA	1.42E-06
I	131	2.71E-05	3.17E-05	1.40E-05	1.06E-02	3.70E-05	NO DATA	7.56E-07
I	132	1.21E-06	2.53E-06	8.99E-07	1.21E-04	2.82E-06	NO DATA	1.36E-06
I	133	9.46E-06	1.37E-05	4.00E-06	2.54E-03	1.60E-05	NO DATA	1.54E-06
I	134	6.58E-07	1.34E-06	4.75E-07	3.18E-05	1.49E-06	NO DATA	9.21E-07
I	135	2.76E-06	5.43E-06	1.98E-06	4.97E-04	6.05E-06	NO DATA	1.31E-06
CS	134	2.83E-04	5.02E-04	5.32E-05	NO DATA	1.36E-04	5.69E-05	9.53E-07
CS	136	3.45E-05	9.61E-05	3.78E-05	NO DATA	4.03E-05	8.40E-06	1.02E-06
CS	137	3.92E-04	4.37E-04	3.25E-05	NO DATA	1.23E-04	5.09E-05	9.53E-07
CS	138	3.61E-07	5.58E-07	2.84E-07	NO DATA	2.93E-07	4.67E-08	6.26E-07
BA	139	1.06E-09	7.03E-13	3.07E-11	NO DATA	4.23E-13	4.25E-06	3.64E-05
BA	140	4.00E-05	4.00E-08	2.07E-06	NO DATA	9.59E-09	1.14E-03	2.74E-05
BA	141	1.12E-10	7.70E-14	3.55E-12	NO DATA	4.64E-14	2.12E-06	3.39E-06
BA	142	2.84E-11	2.36E-14	1.40E-12	NO DATA	1.36E-14	1.11E-06	4.95E-07
LA	140	3.61E-07	1.43E-07	3.68E-08	NO DATA	NO DATA	1.20E-04	6.06E-05
LA	142	7.36E-10	2.69E-10	6.46E-11	NO DATA	NO DATA	5.87E-06	4.25E-05
CE	141	1.98E-05	1.19E-05	1.42E-06	NO DATA	3.75E-06	3.69E-04	1.54E-05
CE	143	2.09E-07	1.38E-07	1.58E-08	NO DATA	4.03E-08	8.30E-05	3.55E-05
CE	144	2.28E-03	8.65E-04	1.26E-04	NO DATA	3.84E-04	7.03E-03	1.06E-04
PR	143	1.00E-05	3.74E-06	4.99E-07	NO DATA	1.41E-06	3.09E-04	2.66E-05
PR	144	3.42E-11	1.32E-11	1.72E-12	NO DATA	4.80E-12	1.15E-06	3.06E-06
ND	147	5.67E-06	5.81E-06	3.57E-07	NO DATA	2.25E-06	2.30E-04	2.23E-05
W	187	9.26E-09	6.44E-09	2.23E-09	NO DATA	NO DATA	2.83E-05	2.54E-05
NP	239	2.65E-07	2.37E-08	1.34E-08	NO DATA	4.73E-08	4.25E-05	1.78E-05

ATTACHMENT A  
(Page 82 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.2-5\***

EXTERNAL DOSE FACTORS FOR STANDING ON CONTAMINATED GROUND  
(mrem/hr per pCi/m<sup>2</sup>)

<u>ELEMENT</u>	<u>TOTAL BODY</u>	<u>SKIN</u>
H-3	0.0	0.0
C-14	0.0	0.0
Na-24	2.50E-08	2.90E-08
P-32	0.0	0.0
Cr-51	2.20E-10	2.60E-10
Mn-54	5.80E-09	6.80E-09
Mn-56	1.10E-08	1.30E-08
Fe-55	0.0	0.0
Fe-59	8.00E-09	9.40E-09
Co-58	7.00E-09	8.20E-09
Co-60	1.70E-08	2.00E-08
Ni-63	0.0	0.0
Ni-65	3.70E-09	4.30E-09
Cu-64	1.50E-09	1.70E-09
Zn-65	4.00E-09	4.60E-09
Zn-69	0.0	0.0
Br-83	6.40E-11	9.30E-11
Br-84	1.20E-08	1.40E-08
Br-85	0.0	0.0
Rb-86	6.30E-10	7.20E-10
Rb-88	3.50E-09	4.00E-09
Rb-89	1.50E-08	1.80E-08
Sr-89	5.60E-13	6.50E-13
Sr-91	7.10E-09	8.30E-09
Sr-92	9.00E-09	1.00E-08
Y-90	2.20E-12	2.60E-12
Y-91M	3.80E-09	4.40E-09
Y-91	2.40E-11	2.70E-11
Y-92	1.60E-09	1.90E-09
Y-93	5.70E-10	7.80E-10
Zr-95	5.00E-09	5.80E-09
Zr-97	5.50E-09	6.40E-09
Nb-95	5.10E-09	6.00E-09
Mo-99	1.90E-09	2.20E-09
Tc-99M	9.60E-10	1.10E-09
Tc-101	2.70E-09	3.00E-09
Ru-103	3.60E-09	4.20E-09
Ru-105	4.50E-09	5.10E-09
Ru-106	1.50E-09	1.80E-09
Ag-110M	1.80E-08	2.10E-08
Te-125M	3.50E-11	4.80E-11
Te-127M	1.10E-12	1.30E-12
Te-127	1.00E-11	1.10E-11
Te-129M	7.70E-10	9.00E-10
Te-129	7.10E-10	8.40E-10

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 83 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.2-5\* (cont'd)**

EXTERNAL DOSE FACTORS FOR STANDING ON CONTAMINATED GROUND  
(mrem/hr per pCi/m<sup>2</sup>)

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

ATTACHMENT A  
(Page 84 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.3-1\*  
INGESTION DOSE FACTORS FOR ADULTS  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	1.05E-07	1.05E-07	1.05E-07	1.05E-07	1.05E-07	1.05E-07
C	14	2.84E-06	5.68E-07	5.68E-07	5.68E-07	5.68E-07	5.68E-07	5.68E-07
NA	24	1.70E-06	1.70E-06	1.70E-06	1.70E-06	1.70E-06	1.70E-06	1.70E-06
P	32	1.93E-04	1.20E-05	7.46E-06	NO DATA	NO DATA	NO DATA	2.17E-05
CR	51	NO DATA	NO DATA	2.66E-09	1.59E-09	5.86E-10	3.53E-09	6.69E-07
MN	54	NO DATA	4.57E-06	8.72E-07	NO DATA	1.36E-06	NO DATA	1.40E-05
MN	56	NO DATA	1.15E-07	2.04E-08	NO DATA	1.46E-07	NO DATA	3.67E-06
FE	55	2.75E-06	1.90E-06	4.43E-07	NO DATA	NO DATA	1.06E-06	1.09E-06
FE	59	4.34E-06	1.02E-05	3.91E-06	NO DATA	NO DATA	2.85E-06	3.40E-05
CO	58	NO DATA	7.45E-07	1.67E-06	NO DATA	NO DATA	NO DATA	1.51E-05
CO	60	NO DATA	2.14E-06	4.72E-06	NO DATA	NO DATA	NO DATA	4.02E-05
NI	63	1.30E-04	9.01E-06	4.36E-06	NO DATA	NO DATA	NO DATA	1.88E-06
NI	65	5.28E-07	6.86E-08	3.13E-08	NO DATA	NO DATA	NO DATA	1.74E-06
CU	64	NO DATA	8.33E-08	3.91E-08	NO DATA	2.10E-07	NO DATA	7.10E-06
ZN	65	4.84E-06	1.54E-05	6.96E-06	NO DATA	1.03E-05	NO DATA	9.70E-06
ZN	69	1.03E-08	1.97E-08	1.37E-09	NO DATA	1.28E-08	NO DATA	2.96E-09
BR	83	NO DATA	NO DATA	4.02E-08	NO DATA	NO DATA	NO DATA	5.79E-08
BR	84	NO DATA	NO DATA	5.21E-08	NO DATA	NO DATA	NO DATA	4.09E-13
BR	85	NO DATA	NO DATA	2.14E-09	NO DATA	NO DATA	NO DATA	1.7E-24
RB	86	NO DATA	2.11E-05	9.83E-06	NO DATA	NO DATA	NO DATA	4.16E-06
RB	88	NO DATA	6.05E-08	3.21E-08	NO DATA	NO DATA	NO DATA	8.36E-19
RB	89	NO DATA	4.01E-08	2.82E-08	NO DATA	NO DATA	NO DATA	2.33E-21
SR	89	3.08E-04	NO DATA	8.84E-06	NO DATA	NO DATA	NO DATA	4.94E-05
SR	90	7.58E-03	NO DATA	1.86E-03	NO DATA	NO DATA	NO DATA	2.19E-04
SR	91	5.67E-06	NO DATA	2.29E-07	NO DATA	NO DATA	NO DATA	2.70E-05
SR	92	2.15E-06	NO DATA	9.30E-08	NO DATA	NO DATA	NO DATA	4.26E-05
Y	90	9.62E-09	NO DATA	2.58E-10	NO DATA	NO DATA	NO DATA	1.02E-04
Y	91M	9.09E-11	NO DATA	3.52E-12	NO DATA	NO DATA	NO DATA	2.67E-10
Y	91	1.41E-07	NO DATA	3.77E-09	NO DATA	NO DATA	NO DATA	7.76E-05
Y	92	8.45E-10	NO DATA	2.47E-11	NO DATA	NO DATA	NO DATA	1.48E-05
Y	93	2.68E-09	NO DATA	7.40E-11	NO DATA	NO DATA	NO DATA	8.50E-05
ZR	95	3.04E-08	9.75E-09	6.60E-09	NO DATA	1.53E-08	NO DATA	3.09E-05
ZR	97	1.68E-09	3.39E-10	1.55E-10	NO DATA	5.12E-10	NO DATA	1.05E-04
NB	95	6.22E-09	3.46E-09	1.86E-09	NO DATA	3.42E-09	NO DATA	2.10E-05
MO	99	NO DATA	4.31E-06	8.20E-07	NO DATA	9.76E-06	NO DATA	9.99E-06
TC	99M	2.47E-10	6.98E-10	8.89E-09	NO DATA	1.06E-08	3.42E-10	4.13E-07

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 85 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.3-1\* (cont'd)  
INGESTION DOSE FACTORS FOR ADULTS  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	2.54E-10	3.66E-10	3.59E-09	NO DATA	6.59E-09	1.87E-10	1.10E-21
RU	103	1.85E-07	NO DATA	7.97E-08	NO DATA	7.06E-07	NO DATA	2.16E-05
RU	105	1.54E-08	NO DATA	6.08E-09	NO DATA	1.99E-07	NO DATA	9.42E-06
RU	106	2.75E-06	NO DATA	3.48E-07	NO DATA	5.31E-06	NO DATA	1.78E-04
AG	110M	1.60E-07	1.48E-07	8.79E-08	NO DATA	2.91E-07	NO DATA	6.04E-05
TE	125M	2.68E-06	9.71E-07	3.59E-07	8.06E-07	1.09E-05	NO DATA	1.07E-05
TE	127M	6.77E-06	2.42E-06	8.25E-07	1.73E-06	2.75E-05	NO DATA	2.27E-05
TE	127	1.10E-07	3.95E-08	2.38E-08	8.15E-08	4.48E-07	NO DATA	8.68E-06
TE	129M	1.15E-05	4.29E-06	1.82E-06	3.95E-06	4.80E-05	NO DATA	5.79E-05
TE	129	3.14E-08	1.18E-08	7.65E-09	2.41E-08	1.32E-07	NO DATA	2.37E-08
TE	131M	1.73E-06	8.46E-07	7.05E-07	1.34E-06	8.57E-06	NO DATA	8.40E-05
TE	131	1.97E-08	8.23E-09	6.22E-09	1.62E-08	8.63E-08	NO DATA	2.79E-09
TE	132	2.52E-06	1.63E-06	1.53E-06	1.80E-06	1.57E-05	NO DATA	7.71E-05
I	130	7.56E-07	2.23E-06	8.80E-07	1.89E-04	3.48E-06	NO DATA	1.92E-06
I	131	4.16E-06	5.95E-06	3.41E-06	1.95E-03	1.02E-05	NO DATA	1.57E-06
I	132	2.03E-07	5.43E-07	1.90E-07	1.90E-05	8.65E-07	NO DATA	1.02E-07
I	133	1.42E-06	2.47E-06	7.53E-07	3.63E-04	4.31E-06	NO DATA	2.22E-06
I	134	1.06E-07	2.88E-07	1.03E-07	4.99E-06	4.58E-07	NO DATA	2.51E-10
I	135	4.43E-07	1.16E-06	4.28E-07	7.65E-05	1.86E-06	NO DATA	1.31E-06
CS	134	6.22E-05	1.48E-04	1.21E-04	NO DATA	4.79E-05	1.59E-05	2.59E-06
CS	136	6.51E-06	2.57E-05	1.85E-05	NO DATA	1.43E-05	1.96E-06	2.92E-06
CS	137	7.97E-05	1.09E-04	7.14E-05	NO DATA	3.70E-05	1.23E-05	2.11E-06
CS	138	5.52E-08	1.09E-07	5.40E-08	NO DATA	8.01E-08	7.91E-09	4.65E-13
BA	139	9.70E-08	6.91E-11	2.84E-09	NO DATA	6.46E-11	3.92E-11	1.72E-07
BA	140	2.03E-05	2.55E-08	1.33E-06	NO DATA	8.67E-09	1.46E-08	4.18E-05
BA	141	4.71E-08	3.56E-11	1.59E-09	NO DATA	3.31E-11	2.02E-11	2.22E-17
BA	142	2.13E-08	2.19E-11	1.34E-09	NO DATA	1.85E-11	1.24E-11	3.00E-26
LA	140	2.50E-09	1.26E-09	3.33E-10	NO DATA	NO DATA	NO DATA	9.25E-05
LA	142	1.28E-10	5.82E-11	1.45E-11	NO DATA	NO DATA	NO DATA	4.25E-07
CE	141	9.36E-09	6.33E-09	7.18E-10	NO DATA	2.94E-09	NO DATA	2.42E-05
CE	143	1.65E-09	1.22E-06	1.35E-10	NO DATA	5.37E-10	NO DATA	4.56E-05
CE	144	4.88E-07	2.04E-07	2.62E-08	NO DATA	1.21E-07	NO DATA	1.65E-04
PR	143	9.20E-09	3.69E-09	4.56E-10	NO DATA	2.13E-09	NO DATA	4.03E-05
PR	144	3.01E-11	1.25E-11	1.53E-12	NO DATA	7.05E-12	NO DATA	4.33E-18
ND	147	6.29E-09	7.27E-09	4.35E-10	NO DATA	4.25E-09	NO DATA	3.49E-05
W	187	1.03E-07	8.61E-08	3.01E-08	NO DATA	NO DATA	NO DATA	2.82E-05

ATTACHMENT A  
(Page 86 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.3-1\* (cont'd)**  
INGESTION DOSE FACTORS FOR ADULTS  
(MREM PER PCI INGESTED)

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
NP 239	1.19E-09	1.17E-10	6.45E-11	NO DATA	3.65E-10	NO DATA	2.40E-05
Sb 124**	2.80E-06	5.29E-08	1.11E-06	6.79E-09	NO DATA	2.18E-06	7.95E-05
Sb 125**	1.79E-06	2.00E-08	4.26E-07	1.82E-09	NO DATA	1.38E-06	1.97E-05
Sb 126**	1.15E-06	2.34E-08	4.15E-07	7.04E-09	NO DATA	7.05E-07	9.40E-05
Co 57**	NO DATA	1.75E-07	2.91E-07	NO DATA	NO DATA	NO DATA	4.44E-06

\*\*Taken from Regulatory Guide 1.109 (Rev. 0)

ATTACHMENT A  
(Page 87 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE A-3.2**  
INGESTION DOSE FACTORS FOR TEENAGERS  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	1.06E-07	1.06E-07	1.06E-07	1.06E-07	1.06E-07	1.06E-07
C	14	4.06E-06	8.12E-07	8.12E-07	8.12E-07	8.12E-07	8.12E-07	8.12E-07
NA	24	2.30E-06	2.30E-06	2.30E-06	2.30E-06	2.30E-06	2.30E-06	2.30E-06
P	32	2.76E-04	1.71E-05	1.07E-05	NO DATA	NO DATA	NO DATA	2.32E-05
CR	51	NO DATA	NO DATA	3.60E-09	2.00E-09	7.89E-10	5.14E-09	6.05E-07
MN	54	NO DATA	5.90E-06	1.17E-06	NO DATA	1.76E-06	NO DATA	1.21E-05
MN	56	NO DATA	1.58E-07	2.81E-08	NO DATA	2.00E-07	NO DATA	1.04E-05
FE	55	3.78E-06	2.68E-06	6.25E-07	NO DATA	NO DATA	1.70E-06	1.16E-06
FE	59	5.87E-06	1.37E-05	5.29E-06	NO DATA	NO DATA	4.32E-06	3.24E-05
CO	58	NO DATA	9.72E-07	2.24E-06	NO DATA	NO DATA	NO DATA	1.34E-05
CO	60	NO DATA	2.81E-06	6.33E-06	NO DATA	NO DATA	NO DATA	3.66E-05
NI	63	1.77E-04	1.25E-05	6.00E-06	NO DATA	NO DATA	NO DATA	1.99E-06
NI	65	7.49E-07	9.57E-08	4.36E-08	NO DATA	NO DATA	NO DATA	5.19E-06
CU	64	NO DATA	1.15E-07	5.41E-08	NO DATA	2.91E-07	NO DATA	8.92E-06
ZN	65	5.76E-06	2.00E-05	9.33E-06	NO DATA	1.28E-05	NO DATA	8.47E-06
ZN	69	1.47E-08	2.80E-08	1.96E-09	NO DATA	1.83E-08	NO DATA	5.16E-08
BR	83	NO DATA	NO DATA	5.74E-08	NO DATA	NO DATA	NO DATA	LT E-24
BR	84	NO DATA	NO DATA	7.22E-08	NO DATA	NO DATA	NO DATA	LT E-24
BR	85	NO DATA	NO DATA	3.05E-09	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	2.98E-05	1.40E-05	NO DATA	NO DATA	NO DATA	4.41E-06
RB	88	NO DATA	8.52E-08	4.54E-08	NO DATA	NO DATA	NO DATA	7.30E-15
RB	89	NO DATA	5.50E-08	3.89E-08	NO DATA	NO DATA	NO DATA	8.43E-17
SR	89	4.40E-04	NO DATA	1.26E-05	NO DATA	NO DATA	NO DATA	5.24E-05
SR	90	8.30E-03	NO DATA	2.05E-03	NO DATA	NO DATA	NO DATA	2.33E-04
SR	91	8.07E-06	NO DATA	3.21E-07	NO DATA	NO DATA	NO DATA	3.66E-05
SR	92	3.05E-06	NO DATA	1.30E-07	NO DATA	NO DATA	NO DATA	7.77E-05
Y	90	1.37E-08	NO DATA	3.69E-10	NO DATA	NO DATA	NO DATA	1.13E-04
Y	91M	1.29E-10	NO DATA	4.93E-12	NO DATA	NO DATA	NO DATA	6.09E-09
Y	91	2.01E-07	NO DATA	5.39E-09	NO DATA	NO DATA	NO DATA	8.24E-05
Y	92	1.21E-09	NO DATA	3.50E-11	NO DATA	NO DATA	NO DATA	3.32E-05
Y	93	3.83E-09	NO DATA	1.05E-10	NO DATA	NO DATA	NO DATA	1.17E-04
ZR	95	4.12E-08	1.30E-08	8.94E-09	NO DATA	1.91E-08	NO DATA	3.00E-05
ZR	97	2.37E-09	4.69E-10	2.16E-10	NO DATA	7.11E-10	NO DATA	1.27E-04
NB	95	8.22E-09	4.56E-09	2.51E-09	NO DATA	4.42E-09	NO DATA	1.95E-05
MO	99	NO DATA	6.03E-06	1.15E-06	NO DATA	1.38E-05	NO DATA	1.08E-05
TC	99M	3.32E-10	9.26E-10	1.20E-08	NO DATA	1.38E-08	5.14E-10	6.08E-07

\*Taken from Regulatory Guide 1.109 (Rev. 1)



ATTACHMENT A  
(Page 88 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A-3.2 (cont'd)**  
INGESTION DOSE FACTORS FOR TEENAGERS  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	3.60E-10	5.12E-10	5.03E-09	NO DATA	9.26E-09	3.12E-10	8.75E-17
RU	103	2.55E-07	NO DATA	1.09E-07	NO DATA	8.99E-07	NO DATA	2.13E-05
RU	105	2.18E-08	NO DATA	8.46E-09	NO DATA	2.75E-07	NO DATA	1.76E-05
RU	106	3.92E-06	NO DATA	4.94E-07	NO DATA	7.56E-06	NO DATA	1.88E-04
AG	110M	2.05E-07	1.94E-07	1.18E-07	NO DATA	3.70E-07	NO DATA	5.45E-05
TE	125M	3.83E-06	1.38E-06	5.12E-07	1.07E-06	NO DATA	NO DATA	1.13E-05
TE	127M	9.67E-06	3.43E-06	1.15E-06	2.30E-06	3.92E-05	NO DATA	2.41E-05
TE	127	1.58E-07	5.60E-08	3.40E-08	1.09E-07	6.40E-07	NO DATA	1.22E-05
TE	129M	1.63E-05	6.05E-06	2.58E-06	5.26E-06	6.82E-05	NO DATA	6.12E-05
TE	129	4.48E-08	1.67E-08	1.09E-08	3.20E-08	1.88E-07	NO DATA	2.45E-07
TE	131M	2.44E-06	1.17E-06	9.76E-07	1.76E-06	1.22E-05	NO DATA	9.39E-05
TE	131	2.79E-08	1.15E-08	8.72E-09	2.15E-08	1.22E-07	NO DATA	2.29E-09
TE	132	3.49E-06	2.21E-06	2.08E-06	2.33E-06	2.12E-05	NO DATA	7.00E-05
I	130	1.03E-06	2.98E-06	1.19E-06	2.43E-04	4.59E-06	NO DATA	2.29E-06
I	131	5.85E-06	8.19E-06	4.40E-06	2.39E-03	1.41E-05	NO DATA	1.62E-06
I	132	2.79E-07	7.30E-07	2.62E-07	2.46E-05	1.15E-06	NO DATA	3.18E-07
I	133	2.01E-06	3.41E-06	1.04E-06	4.76E-04	5.98E-06	NO DATA	2.58E-06
I	134	1.46E-07	3.87E-07	1.39E-07	6.45E-06	6.10E-07	NO DATA	5.10E-09
I	135	6.10E-07	1.57E-06	5.82E-07	1.01E-04	2.48E-06	NO DATA	1.74E-06
CS	134	8.37E-05	1.97E-04	9.14E-05	NO DATA	6.26E-05	2.39E-05	2.45E-06
CS	136	8.59E-06	3.38E-05	2.27E-05	NO DATA	1.84E-05	2.90E-06	2.72E-06
CS	137	1.12E-04	1.49E-04	5.19E-05	NO DATA	5.07E-05	1.97E-05	2.12E-06
CS	138	7.76E-08	1.49E-07	7.45E-08	NO DATA	1.10E-07	1.28E-08	6.76E-11
BA	139	1.39E-07	9.78E-11	4.05E-09	NO DATA	9.22E-11	6.74E-11	1.24E-06
BA	140	2.84E-05	3.48E-08	1.83E-06	NO DATA	1.18E-08	2.34E-08	4.38E-05
BA	141	6.71E-08	5.01E-11	2.24E-09	NO DATA	4.65E-11	3.43E-11	1.43E-13
BA	142	2.99E-08	2.99E-11	1.84E-09	NO DATA	2.53E-11	1.99E-11	9.18E-20
LA	140	3.48E-09	1.71E-09	4.55E-10	NO DATA	NO DATA	NO DATA	9.82E-05
LA	142	1.79E-10	7.95E-11	1.98E-11	NO DATA	NO DATA	NO DATA	2.42E-06
CE	141	1.33E-08	8.88E-09	1.02E-09	NO DATA	4.18E-09	NO DATA	2.54E-05
CE	143	2.35E-09	1.71E-06	1.91E-10	NO DATA	7.67E-10	NO DATA	5.14E-05
CE	144	6.96E-07	2.88E-07	3.74E-08	NO DATA	1.72E-07	NO DATA	1.75E-04
PR	143	1.31E-08	5.23E-09	6.52E-10	NO DATA	3.04E-09	NO DATA	4.31E-05
PR	144	4.30E-11	1.76E-11	2.18E-12	NO DATA	1.01E-11	NO DATA	4.74E-14
ND	147	9.38E-09	1.02E-08	6.11E-10	NO DATA	5.99E-09	NO DATA	3.68E-05
W	187	1.46E-07	1.19E-07	4.17E-08	NO DATA	NO DATA	NO DATA	3.22E-05

ATTACHMENT A  
(Page 89 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A-3.2 (cont'd)**  
INGESTION DOSE FACTORS FOR TEENAGERS  
(MREM PER PCI INGESTED)

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
NP 239	1.76E-09	1.66E-10	9.22E-11	NO DATA	5.21E-10	NO DATA	2.67E-05
Sb 124**	3.87E-06	7.13E-08	1.51E-06	8.78E-09	NO DATA	3.38E-06	7.80E-05
Sb 125**	2.48E-06	2.71E-08	5.80E-07	2.37E-09	NO DATA	2.18E-06	1.93E-05
Sb 126**	1.59E-06	3.25E-08	5.71E-07	8.99E-09	NO DATA	1.14E-06	9.41E-05
Co 57**	NO DATA	2.38E-07	3.99E-07	NO DATA	NO DATA	NO DATA	4.44E-06

\*\*Taken from Regulatory Guide 1.109 (Rev. 0)

ATTACHMENT A  
(Page 90 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE A.3-3**  
INGESTION DOSE FACTORS FOR CHILD  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-ILLI
H	3	NO DATA	2.03E-07	2.03E-07	2.03E-07	2.03E-07	2.03E-07	2.03E-07
C	14	1.21E-05	2.42E-06	2.42E-06	2.42E-06	2.42E-06	2.42E-06	2.42E-06
NA	24	5.80E-06	5.80E-06	5.80E-06	5.80E-06	5.80E-06	5.80E-06	5.80E-06
P	32	8.25E-04	3.86E-05	3.18E-05	NO DATA	NO DATA	NO DATA	2.28E-05
CR	51	NO DATA	NO DATA	8.90E-09	4.94E-09	1.35E-09	9.02E-09	4.72E-07
MN	54	NO DATA	1.07E-05	2.85E-06	NO DATA	3.00E-06	NO DATA	8.98E-06
MN	56	NO DATA	3.34E-07	7.54E-08	NO DATA	4.04E-07	NO DATA	4.84E-05
FE	55	1.15E-05	6.10E-06	1.89E-06	NO DATA	NO DATA	3.45E-06	1.13E-06
FE	59	1.65E-05	2.67E-05	1.33E-05	NO DATA	NO DATA	7.74E-06	2.78E-05
CO	58	NO DATA	1.80E-06	5.51E-06	NO DATA	NO DATA	NO DATA	1.05E-05
CO	60	NO DATA	5.29E-06	1.56E-05	NO DATA	NO DATA	NO DATA	2.93E-05
NI	63	5.38E-04	2.88E-05	1.83E-05	NO DATA	NO DATA	NO DATA	1.94E-06
NI	65	2.22E-06	2.09E-07	1.22E-07	NO DATA	NO DATA	NO DATA	2.56E-05
CU	64	NO DATA	2.45E-07	1.48E-07	NO DATA	5.92E-07	NO DATA	1.15E-05
ZN	65	1.37E-05	3.65E-05	2.27E-05	NO DATA	2.30E-05	NO DATA	6.41E-06
ZN	69	4.38E-08	6.33E-08	5.85E-09	NO DATA	3.84E-08	NO DATA	3.99E-06
BR	83	NO DATA	NO DATA	1.71E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	84	NO DATA	NO DATA	1.98E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	85	NO DATA	NO DATA	9.12E-09	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	6.70E-05	4.12E-05	NO DATA	NO DATA	NO DATA	4.31E-06
RB	88	NO DATA	1.90E-07	1.32E-07	NO DATA	NO DATA	NO DATA	9.32E-09
RB	89	NO DATA	1.17E-07	1.04E-07	NO DATA	NO DATA	NO DATA	1.02E-09
SR	89	1.32E-03	NO DATA	3.77E-05	NO DATA	NO DATA	NO DATA	5.11E-05
SR	90	1.70E-02	NO DATA	4.31E-03	NO DATA	NO DATA	NO DATA	2.29E-04
SR	91	2.40E-05	NO DATA	9.06E-07	NO DATA	NO DATA	NO DATA	5.30E-05
SR	92	9.03E-06	NO DATA	3.62E-07	NO DATA	NO DATA	NO DATA	1.71E-04
Y	90	4.11E-08	NO DATA	1.10E-09	NO DATA	NO DATA	NO DATA	1.17E-04
Y	91M	3.82E-10	NO DATA	1.39E-11	NO DATA	NO DATA	NO DATA	7.48E-07
Y	91	6.02E-07	NO DATA	1.61E-08	NO DATA	NO DATA	NO DATA	8.02E-05
Y	92	3.60E-09	NO DATA	1.03E-10	NO DATA	NO DATA	NO DATA	1.04E-04
Y	93	1.14E-08	NO DATA	3.13E-10	NO DATA	NO DATA	NO DATA	1.70E-04
ZR	95	1.16E-07	2.55E-08	2.27E-08	NO DATA	3.65E-08	NO DATA	2.66E-05
ZR	97	6.99E-09	1.01E-09	5.96E-10	NO DATA	1.45E-09	NO DATA	1.53E-04
NB	95	2.25E-08	8.76E-09	6.26E-09	NO DATA	8.23E-09	NO DATA	1.62E-05
MO	99	NO DATA	1.33E-05	3.29E-06	NO DATA	2.84E-05	NO DATA	1.10E-05
TC	99M	9.23E-10	1.81E-09	3.00E-08	NO DATA	2.63E-08	9.19E-10	1.03E-06

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 91 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.3-3 (cont'd)  
INGESTION DOSE FACTORS FOR CHILD  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	1.07E-09	1.12E-09	1.42E-08	NO DATA	1.91E-08	5.92E-10	3.56E-09
RU	103	7.31E-07	NO DATA	2.81E-07	NO DATA	1.84E-06	NO DATA	1.89E-05
RU	105	6.45E-08	NO DATA	2.34E-08	NO DATA	5.67E-07	NO DATA	4.21E-05
RU	106	1.17E-05	NO DATA	1.46E-06	NO DATA	1.58E-05	NO DATA	1.82E-04
AG	110M	5.39E-07	3.64E-07	2.91E-07	NO DATA	6.78E-07	NO DATA	4.33E-05
TE	125M	1.14E-05	3.09E-06	1.52E-06	3.20E-06	NO DATA	NO DATA	1.10E-05
TE	127M	2.89E-05	7.78E-06	3.43E-06	6.91E-06	8.24E-05	NO DATA	2.34E-05
TE	127	4.71E-07	1.27E-07	1.01E-07	3.26E-07	1.34E-06	NO DATA	1.84E-05
TE	129M	4.87E-05	1.36E-05	7.56E-06	1.57E-05	1.43E-04	NO DATA	5.94E-05
TE	129	1.34E-07	3.74E-08	3.18E-08	9.56E-08	3.92E-07	NO DATA	8.34E-06
TE	131M	7.20E-06	2.49E-06	2.65E-06	5.12E-06	2.41E-05	NO DATA	1.01E-04
TE	131	8.30E-08	2.53E-08	2.47E-08	6.35E-08	2.51E-07	NO DATA	4.36E-07
TE	132	1.01E-05	4.47E-06	5.40E-06	6.51E-06	4.15E-05	NO DATA	4.50E-05
I	130	2.92E-06	5.90E-06	3.04E-06	6.50E-04	8.82E-06	NO DATA	2.76E-06
I	131	1.72E-05	1.73E-05	9.83E-06	5.72E-03	2.84E-05	NO DATA	1.54E-06
I	132	8.00E-07	1.47E-06	6.76E-07	6.82E-05	2.25E-06	NO DATA	1.73E-06
I	133	5.92E-06	7.32E-06	2.77E-06	1.36E-03	1.22E-05	NO DATA	2.95E-06
I	134	4.19E-07	7.78E-07	3.58E-07	1.79E-05	1.19E-06	NO DATA	5.16E-07
I	135	1.75E-06	3.15E-06	1.49E-06	2.79E-04	4.83E-06	NO DATA	2.40E-06
CS	134	2.34E-04	3.84E-04	8.10E-05	NO DATA	1.19E-04	4.27E-05	2.07E-06
CS	136	2.35E-05	6.46E-05	4.18E-05	NO DATA	3.44E-05	5.13E-06	2.27E-06
CS	137	3.27E-04	3.13E-04	4.62E-05	NO DATA	1.02E-04	3.67E-05	1.96E-06
CS	138	2.28E-07	3.17E-07	2.01E-07	NO DATA	2.23E-07	2.40E-08	1.46E-07
BA	139	4.14E-07	2.21E-10	1.20E-08	NO DATA	1.93E-10	1.30E-10	2.39E-05
BA	140	8.31E-05	7.28E-08	4.85E-06	NO DATA	2.37E-08	4.34E-08	4.21E-05
BA	141	2.00E-07	1.12E-10	6.51E-09	NO DATA	9.69E-11	6.58E-10	1.14E-07
BA	142	8.74E-08	6.29E-11	4.88E-09	NO DATA	5.09E-11	3.70E-11	1.14E-09
LA	140	1.01E-08	3.53E-09	1.19E-09	NO DATA	NO DATA	NO DATA	9.84E-05
LA	142	5.24E-10	1.67E-10	5.23E-11	NO DATA	NO DATA	NO DATA	3.31E-05
CE	141	3.97E-08	1.98E-08	2.94E-09	NO DATA	8.68E-09	NO DATA	2.47E-05
CE	143	6.99E-09	3.79E-06	5.49E-10	NO DATA	1.59E-09	NO DATA	5.55E-05
CE	144	2.08E-06	6.52E-07	1.11E-07	NO DATA	3.61E-07	NO DATA	1.70E-04
PR	143	3.93E-08	1.18E-08	1.95E-09	NO DATA	6.39E-09	NO DATA	4.24E-05
PR	144	1.29E-10	3.99E-11	6.49E-12	NO DATA	2.11E-11	NO DATA	8.59E-08
ND	147	2.79E-08	2.26E-08	1.75E-09	NO DATA	1.24E-08	NO DATA	3.58E-05
W	187	4.29E-07	2.54E-07	1.14E-07	NO DATA	NO DATA	NO DATA	3.57E-05

ATTACHMENT A  
(Page 92 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.3-3 (cont'd)**  
INGESTION DOSE FACTORS FOR CHILD  
(MREM PER PCI INGESTED)

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
Np 239	5.25E-09	3.77E-10	2.65E-10	NO DATA	1.09E-09	NO DATA	2.79E-05
Sb 124**	1.11E-05	1.44E-07	3.89E-06	2.45E-08	NO DATA	6.16E-06	6.94E-05
Sb 125**	7.16E-06	5.52E-08	1.50E-06	6.63E-09	NO DATA	3.99E-06	1.71E-05
Sb 126**	4.40E-06	6.73E-08	1.58E-06	2.58E-08	NO DATA	2.10E-06	8.87E-05
Co 57**	NO DATA	4.93E-07	9.98E-07	NO DATA	NO DATA	NO DATA	4.04E-06

\*\*Taken from Regulatory Guide 1.109 (Rev. 0)

ATTACHMENT A  
(Page 93 of 152)

OFFSITE DOSE CALCULATION MANUAL

**TABLE A.3-4\***  
INGESTION DOSE FACTORS FOR INFANT  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	NO DATA	3.08E-07	3.08E-07	3.08E-07	3.08E-07	3.08E-07	3.08E-07
C	14	2.37E-05	5.06E-06	5.06E-06	5.06E-06	5.06E-06	5.06E-06	5.06E-06
NA	24	1.01E-05	1.01E-05	1.01E-05	1.01E-05	1.01E-05	1.01E-05	1.01E-05
P	32	1.70E-03	1.00E-04	6.59E-05	NO DATA	NO DATA	NO DATA	2.30E-05
CR	51	NO DATA	NO DATA	1.41E-08	9.20E-09	2.01E-09	1.79E-08	4.11E-07
MN	54	NO DATA	1.99E-05	4.51E-06	NO DATA	4.41E-06	NO DATA	7.31E-06
MN	56	NO DATA	8.18E-07	1.41E-07	NO DATA	7.03E-07	NO DATA	7.43E-05
FE	55	1.39E-05	8.98E-06	2.40E-06	NO DATA	NO DATA	4.39E-06	1.14E-06
FE	59	3.08E-05	5.38E-05	2.12E-05	NO DATA	NO DATA	1.59E-05	2.57E-05
CO	58	NO DATA	3.60E-06	8.98E-06	NO DATA	NO DATA	NO DATA	8.97E-06
CO	60	NO DATA	1.08E-05	2.55E-05	NO DATA	NO DATA	NO DATA	2.57E-05
NI	63	6.34E-04	3.92E-05	2.20E-05	NO DATA	NO DATA	NO DATA	1.95E-06
NI	65	4.70E-06	5.32E-07	2.42E-07	NO DATA	NO DATA	NO DATA	4.05E-05
CU	64	NO DATA	6.09E-07	2.82E-07	NO DATA	1.03E-06	NO DATA	1.25E-05
ZN	65	1.84E-05	6.31E-05	2.91E-05	NO DATA	3.06E-05	NO DATA	5.33E-05
ZN	69	9.33E-08	1.68E-07	1.25E-08	NO DATA	6.98E-08	NO DATA	1.37E-05
BR	83	NO DATA	NO DATA	3.63E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	84	NO DATA	NO DATA	3.82E-07	NO DATA	NO DATA	NO DATA	LT E-24
BR	85	NO DATA	NO DATA	1.94E-08	NO DATA	NO DATA	NO DATA	LT E-24
RB	86	NO DATA	1.70E-04	8.40E-05	NO DATA	NO DATA	NO DATA	4.35E-06
RB	88	NO DATA	4.98E-07	2.73E-07	NO DATA	NO DATA	NO DATA	4.85E-07
RB	89	NO DATA	2.86E-07	1.97E-07	NO DATA	NO DATA	NO DATA	9.74E-08
SR	89	2.51E-03	NO DATA	7.20E-05	NO DATA	NO DATA	NO DATA	5.16E-05
SR	90	1.85E-02	NO DATA	4.71E-03	NO DATA	NO DATA	NO DATA	2.31E-04
SR	91	5.00E-05	NO DATA	1.81E-06	NO DATA	NO DATA	NO DATA	5.92E-05
SR	92	1.92E-05	NO DATA	7.13E-07	NO DATA	NO DATA	NO DATA	2.07E-04
Y	90	8.69E-08	NO DATA	2.33E-09	NO DATA	NO DATA	NO DATA	1.20E-04
Y	91M	8.10E-10	NO DATA	2.76E-11	NO DATA	NO DATA	NO DATA	2.70E-06
Y	91	1.13E-06	NO DATA	3.01E-08	NO DATA	NO DATA	NO DATA	8.10E-05
Y	92	7.65E-09	NO DATA	2.15E-10	NO DATA	NO DATA	NO DATA	1.46E-04
Y	93	2.43E-08	NO DATA	6.62E-10	NO DATA	NO DATA	NO DATA	1.92E-04
ZR	95	2.06E-07	5.02E-08	3.56E-08	NO DATA	5.41E-08	NO DATA	2.50E-05
ZR	97	1.48E-08	2.54E-09	1.16E-09	NO DATA	2.56E-09	NO DATA	1.62E-04
NB	95	4.20E-08	1.73E-08	1.00E-08	NO DATA	1.24E-08	NO DATA	1.46E-05
MO	99	NO DATA	3.40E-05	6.63E-06	NO DATA	5.08E-05	NO DATA	1.12E-05
TC	99M	1.92E-09	3.96E-09	5.10E-08	NO DATA	4.26E-08	2.07E-09	1.15E-06

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 94 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.3-4\* (cont'd)  
INGESTION DOSE FACTORS FOR INFANT  
(MREM PER PCI INGESTED)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	2.27E-09	2.86E-09	2.83E-08	NO DATA	3.40E-08	1.56E-09	4.86E-07
RU	103	1.48E-06	NO DATA	4.95E-07	NO DATA	3.08E-06	NO DATA	1.80E-05
RU	105	1.36E-07	NO DATA	4.58E-08	NO DATA	1.00E-06	NO DATA	5.41E-05
RU	106	2.41E-05	NO DATA	3.01E-06	NO DATA	2.85E-05	NO DATA	1.83E-04
AG	110M	9.96E-07	7.27E-07	4.81E-07	NO DATA	1.04E-06	NO DATA	3.77E-05
TE	125M	2.33E-05	7.79E-06	3.15E-06	7.84E-06	NO DATA	NO DATA	1.11E-05
TE	127M	5.85E-05	1.94E-05	7.08E-06	1.69E-05	1.44E-04	NO DATA	2.36E-05
TE	127	1.00E-06	3.35E-07	2.15E-07	8.14E-07	2.44E-06	NO DATA	2.10E-05
TE	129M	1.00E-04	3.43E-05	1.54E-05	3.84E-05	2.50E-04	NO DATA	5.97E-05
TE	129	2.84E-07	9.79E-08	6.63E-08	2.38E-07	7.07E-07	NO DATA	2.27E-05
TE	131M	1.52E-05	6.12E-06	5.05E-06	1.24E-05	4.21E-05	NO DATA	1.03E-04
TE	131	1.76E-07	6.50E-08	4.94E-08	1.57E-07	4.50E-07	NO DATA	7.11E-06
TE	132	2.08E-05	1.03E-05	9.61E-06	1.52E-05	6.44E-05	NO DATA	3.81E-05
I	130	6.00E-06	1.32E-05	5.30E-06	1.48E-03	1.45E-05	NO DATA	2.83E-06
I	131	3.59E-05	4.23E-05	1.86E-05	1.39E-02	4.94E-05	NO DATA	1.51E-06
I	132	1.66E-06	3.37E-06	1.20E-06	1.58E-04	3.76E-06	NO DATA	2.73E-06
I	133	1.25E-05	1.82E-05	5.33E-06	3.31E-03	2.14E-05	NO DATA	3.08E-06
I	134	8.69E-07	1.78E-06	6.33E-07	4.15E-05	1.99E-06	NO DATA	1.84E-06
I	135	3.64E-06	7.24E-06	2.64E-06	6.49E-04	8.07E-06	NO DATA	2.62E-06
CS	134	3.77E-04	7.03E-04	7.10E-05	NO DATA	1.81E-04	7.42E-05	1.91E-06
CS	136	4.59E-05	1.35E-04	5.04E-05	NO DATA	5.38E-05	1.10E-05	2.05E-06
CS	137	5.22E-04	6.11E-04	4.33E-05	NO DATA	1.64E-04	6.64E-05	1.91E-06
CS	138	4.81E-07	7.82E-07	3.79E-07	NO DATA	3.90E-07	6.09E-08	1.25E-06
BA	139	8.81E-07	5.84E-10	2.55E-08	NO DATA	3.51E-10	3.54E-10	5.58E-05
BA	140	1.71E-04	1.71E-07	8.81E-06	NO DATA	4.06E-08	1.05E-07	4.20E-05
BA	141	4.25E-07	2.91E-10	1.34E-08	NO DATA	1.75E-10	1.77E-10	5.19E-06
BA	142	1.84E-07	1.53E-10	9.06E-09	NO DATA	8.81E-11	9.26E-11	7.59E-07
LA	140	2.11E-08	8.32E-09	2.14E-09	NO DATA	NO DATA	NO DATA	9.77E-05
LA	142	1.10E-09	4.04E-10	9.67E-11	NO DATA	NO DATA	NO DATA	6.86E-05
CE	141	7.87E-08	4.80E-08	5.65E-09	NO DATA	1.48E-08	NO DATA	2.48E-05
CE	143	1.48E-08	9.82E-06	1.12E-09	NO DATA	2.86E-09	NO DATA	5.73E-05
CE	144	2.98E-06	1.22E-06	1.67E-07	NO DATA	4.93E-07	NO DATA	1.71E-04
PR	143	8.13E-08	3.04E-08	4.03E-09	NO DATA	1.13E-08	NO DATA	4.29E-05
PR	144	2.74E-10	1.06E-10	1.38E-11	NO DATA	3.84E-11	NO DATA	4.93E-06
ND	147	5.53E-08	5.68E-08	3.48E-09	NO DATA	2.19E-08	NO DATA	3.60E-05
W	187	9.03E-07	6.28E-07	2.17E-07	NO DATA	NO DATA	NO DATA	3.69E-05

ATTACHMENT A  
(Page 95 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.3-4\* (cont'd)**  
INGESTION DOSE FACTORS FOR INFANT  
(MREM PER PCI INGESTED)

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
Np 239	1.11E-08	9.93E-10	5.61E-10	NO DATA	1.98E-09	NO DATA	2.87E-05
Sb 124**	2.14E-05	3.15E-07	6.63E-06	5.68E-08	NO DATA	1.34E-05	6.60E-05
Sb 125**	1.23E-05	1.19E-07	2.53E-06	1.54E-08	NO DATA	7.72E-06	1.64E-05
Sb 126**	8.06E-06	1.58E-07	2.91E-06	6.19E-08	NO DATA	5.07E-06	8.35E-06
Co 57**	NO DATA	1.15E-06	1.87E-06	NO DATA	NO DATA	NO DATA	3.92E-06

\*\*Taken from Regulatory Guide 1.109 (Rev. 0)



ATTACHMENT A  
(Page 96 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.3-5\*

## STABLE ELEMENT TRANSFER DATA

Element	$F_{iv}$	$F_m$ (Cow)	$F_f$	
	Veg/soil	Milk (d/l)	Meat (d/kg)	
H	4.8E 00	1.0E-02	1.2E-02	3/18
C	5.5E 00	1.2E-02	3.1E-02	
Na	5.2E-02	4.0E-02	3.0E-02	
P	1.1E 00	2.5E-02	4.6E-02	
Cr	2.5E-04	2.2E-03	2.4E-03	
Mn	2.9E-02	2.5E-04	8.0E-04	
Fe	6.6E-04	1.2E-03	4.0E-02	
Co	9.4E-03	1.0E-03	1.3E-02	
Ni	1.9E-02	6.7E-03	5.3E-02	
Cu	1.2E-01	1.4E-02	8.0E-03	
Zn	4.0E-01	3.9E-02	3.0E-02	
Rb	1.3E-01	3.0E-02	3.1E-02	
Sr	1.7E-02	8.0E-04	6.0E-04	
Y	2.6E-03	1.0E-05	4.6E-03	
Zr	1.7E-04	5.0E-06	3.4E-02	
Nb	9.4E-03	2.5E-03	2.8E-01	
Mo	1.2E-01	7.5E-03	8.0E-03	
Tc	2.5E-01	2.5E-02	4.0E-01	
Ru	5.0E-02	1.0E-06	4.0E-01	
Rh	1.3E 01	1.0E-02	1.5E-03	
Ag	1.5E-01	5.0E-02	1.7E-02	
Te	1.3E 00	1.0E-03	7.7E-02	
I	2.0E-02	6.0E-03	2.9E-03	
Cs	1.0E-02	1.2E-02	4.0E-03	
Ba	5.0E-03	4.0E-04	3.2E-03	
La	2.5E-03	5.0E-06	2.0E-04	
Ce	2.5E-03	1.0E-04	1.2E-03	
Pr	2.5E-03	5.0E-06	4.7E-03	
Nd	2.4E-03	5.0E-06	3.3E-03	
W	1.8E-02	5.0E-04	1.3E-03	
Np	2.5E-03	5.0E-06	2.0E-04	

$F_m$  (Goat)  
Milk (d/l)

| 3/18

H	1.7E-01
C	1.0E-01
P	2.5E-01
Fe	1.3E-04
Cu	1.3E-02
Sr	1.4E-02
I	6.0E-02
Cs	3.0E-01

\*Taken from Regulatory Guide 1.109 (Rev. 1)

ATTACHMENT A  
(Page 97 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-1  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
ADULT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	8.96E 00	8.96E 00	8.96E 00	8.96E 00	8.96E 00	8.96E 00
C	14	3.15E 04	6.30E 03	6.30E 03	6.30E 03	6.30E 03	6.30E 03	6.30E 03
NA	24	5.48E 02	5.48E 02	5.48E 02	5.48E 02	5.48E 02	5.48E 02	5.48E 02
P	32	4.62E 07	2.87E 06	1.79E 06	0.00E-01	0.00E-01	0.00E-01	5.20E 06
CR	51	0.00E-01	0.00E-01	1.49E 00	8.94E-01	3.29E-01	1.98E 00	3.76E 02
MN	54	0.00E-01	4.76E 03	9.08E 02	0.00E-01	1.42E 03	0.00E-01	1.46E 04
MN	56	0.00E-01	1.20E 02	2.12E 01	0.00E-01	1.52E 02	0.00E-01	3.82E 03
FE	55	8.87E 02	6.13E 02	1.43E 02	0.00E-01	0.00E-01	3.42E 02	3.52E 02
FE	59	1.40E 03	3.29E 03	1.26E 03	0.00E-01	0.00E-01	9.19E 02	1.10E 04
CO	58	0.00E-01	1.51E 02	3.39E 02	0.00E-01	0.00E-01	0.00E-01	3.06E 03
CO	60	0.00E-01	4.34E 02	9.58E 02	0.00E-01	0.00E-01	0.00E-01	8.16E 03
NI	63	4.19E 04	2.94E 03	1.41E 03	0.00E-01	0.00E-01	0.00E-01	6.07E 02
NI	65	1.70E 02	2.21E 01	1.01E 01	0.00E-01	0.00E-01	0.00E-01	5.61E 02
CU	64	0.00E-01	1.69E 01	7.93E 00	0.00E-01	4.26E-01	0.00E-01	1.44E 03
ZN	65	2.36E 04	7.50E 04	3.39E 04	0.00E-01	5.02E 04	0.00E-01	4.73E 04
ZN	69	5.02E 01	9.60E 01	6.67E 00	0.00E-01	6.24E-01	0.00E-01	1.44E 01
BR	83	0.00E-01	0.00E-01	4.38E 01	0.00E-01	0.00E-01	0.00E-01	6.30E 01
BR	84	0.00E-01	0.00E-01	5.67E 01	0.00E-01	0.00E-01	0.00E-01	4.45E-04
BR	85	0.00E-01	0.00E-01	2.33E 00	0.00E-01	0.00E-01	0.00E-01	1.09E-15
RB	86	0.00E-01	1.03E 05	4.79E 04	0.00E-01	0.00E-01	0.00E-01	2.03E 04
RB	88	0.00E-01	2.95E 02	1.56E 02	0.00E-01	0.00E-01	0.00E-01	4.07E-09
RB	89	0.00E-01	1.95E 02	1.37E 02	0.00E-01	0.00E-01	0.00E-01	1.13E-11
SR	89	4.78E 04	0.00E-01	1.37E 03	0.00E-01	0.00E-01	0.00E-01	7.66E 03
SR	90	1.18E 06	0.00E-01	2.88E 05	0.00E-01	0.00E-01	0.00E-01	3.40E 04
SR	91	8.79E 02	0.00E-01	3.55E 01	0.00E-01	0.00E-01	0.00E-01	4.19E 03
SR	92	3.33E 02	0.00E-01	1.44E 01	0.00E-01	0.00E-01	0.00E-01	6.60E 03
Y	90	1.38E 00	0.00E-01	3.69E-02	0.00E-01	0.00E-01	0.00E-01	1.46E 04
Y	91M	1.30E-02	0.00E-01	5.04E-04	0.00E-01	0.00E-01	0.00E-01	3.82E-02
Y	91	2.02E 01	0.00E-01	5.39E-01	0.00E-01	0.00E-01	0.00E-01	1.11E 04
Y	92	1.21E-01	0.00E-01	3.53E-03	0.00E-01	0.00E-01	0.00E-01	2.12E 03
Y	93	3.83E-01	0.00E-01	1.06E-02	0.00E-01	0.00E-01	0.00E-01	1.22E 04
ZR	95	2.77E 00	8.88E-01	6.01E-01	0.00E-01	1.39E 00	0.00E-01	2.82E 03
ZR	97	1.53E-01	3.09E-02	1.41E-02	0.00E-01	4.67E-02	0.00E-01	9.57E 03
NB	95	4.47E 02	2.49E 02	1.34E 02	0.00E-01	2.46E 02	0.00E-01	1.51E 06
MO	99	0.00E-01	4.62E 02	8.79E 01	0.00E-01	1.05E 03	0.00E-01	1.07E 03
TC	99M	2.94E-02	8.32E-02	1.06E 00	0.00E-01	1.26E 00	4.07E-02	4.92E 01

ATTACHMENT A  
(Page 98 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.4-1 (cont'd)**  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
ADULT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	3.03E-02	4.36E-02	4.28E-01	0.00E-01	7.85E-01	2.23E-02	1.31E-13
RU	103	1.98E 01	0.00E-01	8.54E 00	0.00E-01	7.57E 01	0.00E-01	2.31E 03
RU	105	1.65E 00	0.00E-01	6.52E-01	0.00E-01	2.13E 01	0.00E-01	1.01E 03
RU	106	2.95E 02	0.00E-01	3.73E 01	0.00E-01	5.69E 02	0.00E-01	1.91E 04
AG	110M	1.42E 01	1.31E 01	7.80E 00	0.00E-01	2.58E 01	0.00E-01	5.36E 03
TE	125M	2.79E 03	1.01E 03	3.74E 02	8.39E 02	1.13E 04	0.00E-01	1.11E 04
TE	127M	7.05E 03	2.52E 03	8.59E 02	1.80E 03	2.86E 04	0.00E-01	2.36E 04
TE	127	1.14E 02	4.11E 01	2.48E 01	8.48E 01	4.66E 02	0.00E-01	9.03E 03
TE	129M	1.20E 04	4.47E 03	1.89E 03	4.11E 03	5.00E 04	0.00E-01	6.03E 04
TE	129	3.27E 01	1.23E 01	7.96E 00	2.51E 01	1.37E 02	0.00E-01	2.47E 01
TE	131M	1.80E 03	8.81E 02	7.34E 02	1.39E 03	8.92E 03	0.00E-01	8.74E 04
TE	131	2.05E 01	8.57E 00	6.47E 00	1.69E 01	8.98E 01	0.00E-01	2.90E 00
TE	132	2.62E 03	1.70E 03	1.59E 03	1.87E 03	1.63E 04	0.00E-01	8.02E 04
I	130	9.01E 01	2.66E 02	1.05E 02	2.25E 04	4.15E 02	0.00E-01	2.29E 02
I	131	4.96E 02	7.09E 02	4.06E 02	2.32E 05	1.22E 03	0.00E-01	1.87E 02
I	132	2.42E 01	6.47E 01	2.26E 01	2.26E 03	1.03E 02	0.00E-01	1.22E 01
I	133	1.69E 02	2.94E 02	8.97E 01	4.32E 04	5.13E 02	0.00E-01	2.64E 02
I	134	1.26E 01	3.43E 01	1.23E 01	5.94E 02	5.46E 01	0.00E-01	2.99E-02
I	135	5.28E 01	1.38E 02	5.10E 01	9.11E 03	2.22E 02	0.00E-01	1.56E 02
CS	134	3.03E 05	7.21E 05	5.89E 05	0.00E-01	2.33E 05	7.75E 04	1.26E 04
CS	136	3.17E 04	1.25E 05	9.01E 04	0.00E-01	6.97E 04	9.55E 03	1.42E 04
CS	137	3.88E 05	5.31E 05	3.48E 05	0.00E-01	1.80E 05	5.99E 04	1.03E 04
CS	138	2.69E 02	5.31E 02	2.63E 02	0.00E-01	3.90E 02	3.85E 01	2.27E-03
BA	139	9.00E 00	6.41E-03	2.64E-01	0.00E-01	5.99E-03	3.64E-03	1.60E 01
BA	140	1.88E 03	2.37E 00	1.23E 02	0.00E-01	8.05E-01	1.35E 00	3.88E 03
BA	141	4.37E 00	3.30E-03	1.48E-01	0.00E-01	3.07E-03	1.87E-03	2.06E-09
BA	142	1.98E 00	2.03E-03	1.24E-01	0.00E-01	1.72E-03	1.15E-03	2.78E-18
LA	140	3.58E-01	1.80E-01	4.76E-02	0.00E-01	0.00E-01	0.00E-01	1.32E 04
LA	142	1.83E-02	8.33E-03	2.07E-03	0.00E-01	0.00E-01	0.00E-01	6.08E 01
CE	141	8.01E-01	5.42E-01	6.15E-02	0.00E-01	2.52E-01	0.00E-01	2.07E 03
CE	143	1.41E-01	1.04E 02	1.16E-02	0.00E-01	4.60E-02	0.00E-01	3.90E 03
CE	144	4.18E 01	1.75E 01	2.24E 00	0.00E-01	1.04E 01	0.00E-01	1.41E 04
PR	143	1.32E 00	5.28E-01	6.52E-02	0.00E-01	3.05E-01	0.00E-01	5.77E 03
PR	144	4.31E-03	1.79E-03	2.19E-04	0.00E-01	1.01E-03	0.00E-01	6.19E-10
ND	147	9.00E-01	1.04E 00	6.22E-02	0.00E-01	6.08E-01	0.00E-01	4.99E 03
W	187	3.04E 02	2.55E 02	8.90E 01	0.00E-01	0.00E-01	0.00E-01	8.34E 04

ATTACHMENT A  
(Page 99 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.4-1 (cont'd)**  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
ADULT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
NP	239	1.28E-01	1.25E-02	6.91E-03	0.00E-01	3.91E-02	0.00E-01	2.57E 03
Sb	124	2.40E 02	4.53E 00	9.50E 01	5.81E-01	0.00E-01	1.87E 02	6.81E 03
Sb	125	1.53E 02	1.71E 00	3.65E 01	1.56E-01	0.00E-01	1.18E 02	1.69E 03
Sb	126	9.85E 01	2.00E 00	3.55E 01	6.03E-01	0.00E-01	6.04E 01	8.05E 03
Co	57	0.00E-01	3.55E 01	5.90E 01	0.00E-01	0.00E-01	0.00E-01	9.01E 02

ATTACHMENT A  
(Page 100 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-2  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
TEEN

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	6.34E 00	6.34E 00	6.34E 00	6.34E 00	6.34E 00	6.34E 00
C	14	3.43E 04	6.86E 03	6.86E 03	6.86E 03	6.86E 03	6.86E 03	6.86E 03
NA	24	5.53E 02	5.53E 02	5.53E 02	5.53E 02	5.53E 02	5.53E 02	5.53E 02
P	32	5.04E 07	3.12E 06	1.95E 06	0.00E-01	0.00E-01	0.00E-01	4.23E 06
CR	51	0.00E-01	0.00E-01	1.52E 00	8.46E-00	3.34E-00	2.17E 00	2.56E 02
MN	54	0.00E-01	4.65E 03	9.22E 02	0.00E-01	1.39E 03	0.00E-01	9.53E 03
MN	56	0.00E-01	1.24E 02	2.21E 01	0.00E-01	1.58E 02	0.00E-01	8.19E 03
FE	55	9.09E 02	6.45E 02	1.50E 02	0.00E-01	0.00E-01	4.09E 02	2.79E 02
FE	59	1.41E 03	3.30E 03	1.27E 03	0.00E-01	0.00E-01	1.04E 03	7.79E 03
CO	58	0.00E-01	1.45E 02	3.35E 02	0.00E-01	0.00E-01	0.00E-01	2.00E 03
CO	60	0.00E-01	4.20E 02	9.45E 02	0.00E-01	0.00E-01	0.00E-01	5.47E 03
NI	63	4.26E 04	3.01E 03	1.44E 03	0.00E-01	0.00E-01	0.00E-01	4.79E 02
NI	65	1.80E 02	2.30E 01	1.05E 01	0.00E-01	0.00E-01	0.00E-01	1.25E 03
CU	64	0.00E-01	1.72E 01	8.08E 00	0.00E-01	4.35E 01	0.00E-01	1.33E 03
ZN	65	2.13E 04	7.41E 04	3.46E 04	0.00E-01	4.74E 04	0.00E-01	3.14E 04
ZN	69	5.45E 01	1.04E 02	7.26E 00	0.00E-01	6.78E 01	0.00E-01	1.91E 02
BR	83	0.00E-01	0.00E-01	4.73E 01	0.00E-01	0.00E-01	0.00E-01	8.24E-16
BR	84	0.00E-01	0.00E-01	5.95E 01	0.00E-01	0.00E-01	0.00E-01	8.24E-16
BR	85	0.00E-01	0.00E-01	2.51E 00	0.00E-01	0.00E-01	0.00E-01	8.24E-16
RB	86	0.00E-01	1.10E 05	5.19E 04	0.00E-01	0.00E-01	0.00E-01	1.63E 04
RB	88	0.00E-01	3.16E 02	1.68E 02	0.00E-01	0.00E-01	0.00E-01	2.71E-05
RB	89	0.00E-01	2.04E 02	1.44E 02	0.00E-01	0.00E-01	0.00E-01	3.12E-07
SR	89	4.97E 04	0.00E-01	1.42E 03	0.00E-01	0.00E-01	0.00E-01	5.91E 03
SR	90	9.37E 05	0.00E-01	2.31E 05	0.00E-01	0.00E-01	0.00E-01	2.63E 04
SR	91	9.11E 02	0.00E-01	3.62E 01	0.00E-01	0.00E-01	0.00E-01	4.13E 03
SR	92	3.44E 02	0.00E-01	1.47E 01	0.00E-01	0.00E-01	0.00E-01	8.77E 03
Y	90	1.42E 00	0.00E-01	3.83E-01	0.00E-01	0.00E-01	0.00E-01	1.17E 04
Y	91M	1.34E-01	0.00E-01	5.11E-03	0.00E-01	0.00E-01	0.00E-01	6.32E-01
Y	91	2.09E 01	0.00E-01	5.59E-00	0.00E-01	0.00E-01	0.00E-01	8.55E 03
Y	92	1.26E-00	0.00E-01	3.63E-02	0.00E-01	0.00E-01	0.00E-01	3.44E 03
Y	93	3.97E-00	0.00E-01	1.09E-01	0.00E-01	0.00E-01	0.00E-01	1.21E 04
ZR	95	2.64E 00	8.34E-01	5.74E-00	0.00E-01	1.23E 00	0.00E-01	1.92E 03
ZR	97	1.52E-00	3.01E-02	1.39E-01	0.00E-01	4.56E-01	0.00E-01	8.15E 03
NB	95	4.50E 02	2.50E 02	1.37E 02	0.00E-01	2.42E 02	0.00E-01	1.07E 06
MO	99	0.00E-01	4.61E 02	8.78E 01	0.00E-01	1.05E 03	0.00E-01	8.25E 02
TC	99M	2.84E-01	7.92E-02	1.03E 00	0.00E-01	1.18E 00	4.39E-01	5.20E 01

ATTACHMENT A  
(Page 101 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-2 (cont'd)  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
TEEN

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	3.08E-01	4.38E-02	4.30E-00	0.00E-01	7.92E-00	2.67E-01	7.48E-09
RU	103	1.95E 01	0.00E-01	8.33E 00	0.00E-01	6.87E 01	0.00E-01	1.63E 03
RU	105	1.67E 00	0.00E-01	6.46E-00	0.00E-01	2.10E 01	0.00E-01	1.34E 03
RU	106	2.99E 02	0.00E-01	3.77E 01	0.00E-01	5.77E 02	0.00E-01	1.44E 04
AG	110M	1.28E 01	1.21E 01	7.36E 00	0.00E-01	2.31E 01	0.00E-01	3.40E 03
TE	125M	3.02E 03	1.09E 03	4.03E 02	8.43E 02	0.00E-01	0.00E-01	8.90E 03
TE	127M	7.62E 03	2.70E 03	9.06E 02	1.81E 03	3.09E 04	0.00E-01	1.90E 04
TE	127	1.24E 02	4.41E 01	2.68E 01	8.59E 01	5.04E 02	0.00E-01	9.61E 03
TE	129M	1.28E 04	4.77E 03	2.03E 03	4.14E 03	5.37E 04	0.00E-01	4.82E 04
TE	129	3.53E 01	1.32E 01	8.59E 00	2.52E 01	1.48E 02	0.00E-01	1.93E 02
TE	131M	1.92E 03	9.22E 02	7.69E 02	1.39E 03	9.61E 03	0.00E-01	7.40E 04
TE	131	2.20E 01	9.06E 00	6.87E 00	1.69E 01	9.61E 01	0.00E-01	1.80E 00
TE	132	2.75E 03	1.74E 03	1.64E 03	1.84E 03	1.67E 04	0.00E-01	5.51E 04
I	130	8.81E 01	2.55E 02	1.02E 02	2.08E 04	3.92E 02	0.00E-01	1.96E 02
I	131	5.00E 02	7.00E 02	3.76E 02	2.04E 05	1.21E 03	0.00E-01	1.39E 02
I	132	2.39E 01	6.24E 01	2.24E 01	2.10E 03	9.83E 01	0.00E-01	2.72E 01
I	133	1.72E 02	2.92E 02	8.89E 01	4.07E 04	5.11E 02	0.00E-01	2.21E 02
I	134	1.25E 01	3.31E 01	1.19E 01	5.51E 02	5.22E 01	0.00E-01	4.36E-01
I	135	5.22E 01	1.34E 02	4.98E 01	8.64E 03	2.12E 02	0.00E-01	1.49E 02
CS	134	3.10E 05	7.30E 05	3.39E 05	0.00E-01	2.32E 05	8.86E 04	9.08E 03
CS	136	3.18E 04	1.25E 05	8.41E 04	0.00E-01	6.82E 04	1.07E 04	1.01E 04
CS	137	4.15E 05	5.52E 05	1.92E 05	0.00E-01	1.88E 05	7.30E 04	7.86E 03
CS	138	2.88E 02	5.52E 02	2.76E 02	0.00E-01	4.08E 02	4.74E 01	2.51E-01
BA	139	9.10E 00	6.40E-03	2.65E-00	0.00E-01	6.03E-02	4.41E-02	8.11E 01
BA	140	1.86E 03	2.28E 00	1.20E 02	0.00E-01	7.72E-00	1.53E 00	2.87E 03
BA	141	4.39E 00	3.28E-03	1.47E-00	0.00E-01	3.04E-02	2.24E-02	9.36E-06
BA	142	1.96E 00	1.96E-03	1.20E-00	0.00E-01	1.66E-02	1.30E-02	6.01E-12
LA	140	3.61E-00	1.77E-01	4.72E-01	0.00E-01	0.00E-01	0.00E-01	1.02E 04
LA	142	1.86E-01	8.25E-03	2.05E-02	0.00E-01	0.00E-01	0.00E-01	2.51E 02
CE	141	7.98E-00	5.32E-01	6.12E-01	0.00E-01	2.51E-00	0.00E-01	1.52E 03
CE	143	1.41E-00	1.03E 02	1.15E-01	0.00E-01	4.60E-01	0.00E-01	3.08E 03
CE	144	4.17E 01	1.73E 01	2.24E 00	0.00E-01	1.03E 01	0.00E-01	1.05E 04
PR	143	1.36E 00	5.43E-01	6.76E-01	0.00E-01	3.15E-00	0.00E-01	4.47E 03
PR	144	4.46E-02	1.83E-03	2.26E-03	0.00E-01	1.05E-02	0.00E-01	4.92E-06
ND	147	9.73E-00	1.06E 00	6.34E-01	0.00E-01	6.21E-00	0.00E-01	3.82E 03
W	187	3.28E 02	2.67E 02	9.37E 01	0.00E-01	0.00E-01	0.00E-01	7.24E 04

ATTACHMENT A  
(Page 102 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.4-2 (cont'd)**  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
TEEN

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
NP 239	1.34E-00	1.27E-02	7.04E-02	0.00E-01	3.98E-01	0.00E-01	2.04E 03
Sb 124	2.32E 02	4.28E 00	9.05E 01	5.26E-00	0.00E-01	2.03E 02	4.68E 03
Sb 125	1.49E 02	1.63E 00	3.48E 01	1.42E-00	0.00E-01	1.31E 02	1.16E 03
Sb 126	9.53E 01	1.95E 00	3.42E 01	5.39E-00	0.00E-01	6.84E 01	5.64E 03
Co 57	0.00E-01	3.55E 01	5.96E 01	0.00E-01	0.00E-01	0.00E-01	6.63E 02

ATTACHMENT A  
(Page 103 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-3  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu\text{Ci}/\text{ML}$   
CHILD

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.19E 01	1.19E 01	1.19E 01	1.19E 01	1.19E 01	1.19E 01
C	14	4.45E 04	8.90E 03	8.90E 03	8.90E 03	8.90E 03	8.90E 03	8.90E 03
NA	24	7.93E 02	7.93E 02	7.93E 02	7.93E 02	7.93E 02	7.93E 02	7.93E 02
P	32	6.49E 07	3.04E 06	2.50E 06	0.00E-01	0.00E-01	0.00E-01	1.79E 06
CR	51	0.00E-01	0.00E-01	1.92E 00	1.06E 00	2.91E-00	1.94E 00	1.02E 02
MN	54	0.00E-01	3.99E 03	1.06E 03	0.00E-01	1.12E 03	0.00E-01	3.35E 03
MN	56	0.00E-01	1.25E 02	2.81E 01	0.00E-01	1.51E 02	0.00E-01	1.80E 04
FE	55	1.57E 03	8.34E 02	2.59E 02	0.00E-01	0.00E-01	4.72E 02	1.55E 02
FE	59	2.26E 03	3.65E 03	1.82E 03	0.00E-01	0.00E-01	1.06E 03	3.80E 03
CO	58	0.00E-01	1.75E 02	5.37E 02	0.00E-01	0.00E-01	0.00E-01	1.02E 03
CO	60	0.00E-01	5.16E 02	1.52E 03	0.00E-01	0.00E-01	0.00E-01	2.86E 03
NI	63	7.36E 04	3.94E 03	2.50E 03	0.00E-01	0.00E-01	0.00E-01	2.65E 02
NI	65	3.04E 02	2.86E 01	1.67E 01	0.00E-01	0.00E-01	0.00E-01	3.50E 03
CU	64	0.00E-01	2.39E 01	1.44E 01	0.00E-01	5.77E 01	0.00E-01	1.12E 03
ZN	65	2.23E 04	5.95E 04	3.70E 04	0.00E-01	3.75E 04	0.00E-01	1.05E 04
ZN	69	7.15E 01	1.03E 02	9.54E 00	0.00E-01	6.26E 01	0.00E-01	6.51E 03
BR	83	0.00E-01	0.00E-01	6.64E 01	0.00E-01	0.00E-01	0.00E-01	3.89E-16
BR	84	0.00E-01	0.00E-01	7.69E 01	0.00E-01	0.00E-01	0.00E-01	3.89E-16
BR	85	0.00E-01	0.00E-01	3.54E 00	0.00E-01	0.00E-01	0.00E-01	3.89E-16
RB	86	0.00E-01	1.09E 05	6.72E 04	0.00E-01	0.00E-01	0.00E-01	7.03E 03
RB	88	0.00E-01	3.10E 02	2.15E 02	0.00E-01	0.00E-01	0.00E-01	1.52E 01
RB	89	0.00E-01	1.91E 02	1.70E 02	0.00E-01	0.00E-01	0.00E-01	1.66E 00
SR	89	1.08E 05	0.00E-01	3.08E 03	0.00E-01	0.00E-01	0.00E-01	4.18E 03
SR	90	1.39E 06	0.00E-01	3.52E 05	0.00E-01	0.00E-01	0.00E-01	1.87E 04
SR	91	1.96E 03	0.00E-01	7.41E 01	0.00E-01	0.00E-01	0.00E-01	4.33E 03
SR	92	7.38E 02	0.00E-01	2.96E 01	0.00E-01	0.00E-01	0.00E-01	1.40E 04
Y	90	3.20E 00	0.00E-01	8.56E-01	0.00E-01	0.00E-01	0.00E-01	9.10E 03
Y	91M	2.97E-01	0.00E-01	1.08E-02	0.00E-01	0.00E-01	0.00E-01	5.82E 01
Y	91	4.68E 01	0.00E-01	1.25E-01	0.00E-01	0.00E-01	0.00E-01	6.24E 03
Y	92	2.80E-00	0.00E-01	8.01E-02	0.00E-01	0.00E-01	0.00E-01	8.09E 03
Y	93	8.87E-00	0.00E-01	2.44E-01	0.00E-01	0.00E-01	0.00E-01	1.32E 04
ZR	95	7.05E 00	1.55E 00	1.38E 00	0.00E-01	2.22E 00	0.00E-01	1.62E 03
ZR	97	4.25E-00	6.13E-02	3.62E-01	0.00E-01	8.81E-01	0.00E-01	9.29E 03
NB	95	5.32E 02	2.07E 02	1.48E 02	0.00E-01	1.95E 02	0.00E-01	3.83E 05
MO	99	0.00E-01	8.78E 02	2.17E 02	0.00E-01	1.87E 03	0.00E-01	7.26E 02
TC	99M	6.46E-01	1.27E-01	2.10E 00	0.00E-01	1.84E 00	6.43E-01	7.20E 01



ATTACHMENT A  
(Page 104 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-3 (cont'd)  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu\text{Ci}/\text{ML}$   
CHILD

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	7.48E-01	7.83E-02	9.93E-00	0.00E-01	1.34E 00	4.14E-01	2.49E-01
RU	103	4.83E 01	0.00E-01	1.85E 01	0.00E-01	1.21E 02	0.00E-01	1.25E 03
RU	105	4.26E 00	0.00E-01	1.54E 00	0.00E-01	3.74E 01	0.00E-01	2.78E 03
RU	106	7.72E 02	0.00E-01	9.64E 01	0.00E-01	1.04E 03	0.00E-01	1.20E 04
AG	110M	3.23E 01	2.18E 01	1.74E 01	0.00E-01	4.06E 01	0.00E-01	2.60E 03
TE	125M	4.25E 03	1.15E 03	5.67E 02	1.19E 03	0.00E-01	0.00E-01	4.10E 03
TE	127M	1.08E 04	2.90E 03	1.28E 03	2.58E 03	3.07E 04	0.00E-01	8.72E 03
TE	127	1.76E 02	4.73E 01	3.77E 01	1.22E 02	5.00E 02	0.00E-01	6.86E 03
TE	129M	1.82E 04	5.07E 03	1.70E 03	5.85E 03	5.33E 04	0.00E-01	2.21E 04
TE	129	5.00E 01	1.39E 01	1.19E 01	3.56E 01	1.46E 02	0.00E-01	3.11E 03
TE	131M	2.68E 03	9.28E 02	9.88E 02	1.91E 03	8.98E 03	0.00E-01	3.77E 04
TE	131	3.09E 01	9.43E 00	9.21E 00	2.37E 01	9.36E 01	0.00E-01	1.63E 02
TE	132	3.77E 03	1.67E 03	2.01E 03	2.43E 03	1.55E 04	0.00E-01	1.68E 04
I	130	2.04E 02	4.13E 02	2.13E 02	4.55E 04	6.17E 02	0.00E-01	1.93E 02
I	131	1.20E 03	1.21E 03	6.88E 02	4.00E 05	1.99E 03	0.00E-01	1.08E 02
I	132	5.60E 01	1.03E 02	4.73E 01	4.77E 03	1.57E 02	0.00E-01	1.21E 02
I	133	4.14E 02	5.12E 02	1.94E 02	9.51E 04	8.53E 02	0.00E-01	2.06E 02
I	134	2.93E 01	5.44E 01	2.50E 01	1.25E 03	8.32E 01	0.00E-01	3.61E 01
I	135	1.22E 02	2.20E 02	1.04E 02	1.95E 04	3.38E 02	0.00E-01	1.68E 02
CS	134	3.82E 05	6.26E 05	1.32E 05	0.00E-01	1.94E 05	6.97E 04	3.38E 03
CS	136	3.83E 04	1.05E 05	6.82E 04	0.00E-01	5.61E 04	8.37E 03	3.70E 03
CS	137	5.33E 05	5.11E 05	7.54E 04	0.00E-01	1.66E 05	5.99E 04	3.20E 03
CS	138	3.72E 02	5.17E 02	3.28E 02	0.00E-01	3.64E 02	3.92E 01	2.38E 02
BA	139	2.54E 01	1.35E-02	7.35E-00	0.00E-01	1.18E-01	7.97E-02	1.47E 03
BA	140	5.09E-03	4.46E 00	2.97E 02	0.00E-01	1.45E 00	2.66E 00	2.58E 03
BA	141	1.23E 01	6.86E-03	3.99E-00	0.00E-01	5.94E-02	4.03E-01	6.99E 00
BA	142	5.36E 00	3.85E-03	2.99E-00	0.00E-01	3.12E-02	2.27E-02	6.99E-02
LA	140	7.86E-00	2.75E-01	9.26E-01	0.00E-01	0.00E-01	0.00E-01	7.66E 03
LA	142	4.08E-01	1.30E-02	4.07E-02	0.00E-01	0.00E-01	0.00E-01	2.58E 03
CE	141	2.34E 00	1.17E 00	1.73E-00	0.00E-01	5.11E-00	0.00E-01	1.46E 03
CE	143	4.12E-00	2.23E 02	3.24E-01	0.00E-01	9.37E-01	0.00E-01	3.27E 03
CE	144	1.23E 02	3.84E 01	6.54E 00	0.00E-01	2.13E 01	0.00E-01	1.00E 04
PR	143	3.06E 00	9.18E-01	1.52E-00	0.00E-01	4.97E-00	0.00E-01	3.30E 03
PR	144	1.00E-01	3.10E-03	5.05E-03	0.00E-01	1.64E-02	0.00E-01	6.68E 00
ND	147	2.17E 00	1.76E 00	1.36E-00	0.00E-01	9.65E-00	0.00E-01	2.79E 03
W	187	4.30E 02	2.55E 02	1.14E 02	0.00E-01	0.00E-01	0.00E-01	3.58E 04

ATTACHMENT A  
(Page 105 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.4-3 (cont'd)**  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ Ci/ML  
CHILD

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
NP	239	3.47E-00	2.49E-02	1.75E-01	0.00E-01	7.19E-01	0.00E-01	1.84E 03
Sb	124	6.54E 02	8.49E 00	2.29E 02	1.44E 00	0.00E-01	3.63E 02	4.09E 03
Sb	125	4.22E 02	3.25E 00	8.84E 01	3.91E-00	0.00E-01	2.35E 02	1.01E 03
Sb	126	2.59E 02	3.97E 00	9.31E 01	1.52E 00	0.00E-01	1.24E 02	5.23E 03
Co	57	0.00E-01	4.81E 01	9.73E 01	0.00E-01	0.00E-01	0.00E-01	3.94E 02

ATTACHMENT A  
(Page 106 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-4  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
INFANT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.16E 01	1.16E 01	1.16E 01	1.16E 01	1.16E 01	1.16E 01
C	14	8.92E 02	1.90E 02	1.90E 02	1.90E 02	1.90E 02	1.90E 02	1.90E 02
NA	24	3.80E 02	3.80E 02	3.80E 02	3.80E 02	3.80E 02	3.80E 02	3.80E 02
P	32	6.40E 04	3.76E 03	2.48E 03	0.00E-01	0.00E-01	0.00E-01	8.65E 02
CR	51	0.00E-01	0.00E-01	5.30E-01	3.46E-01	7.56E-02	6.73E-01	1.55E 01
MN	54	0.00E-01	7.49E 02	1.70E 02	0.00E-01	1.66E 02	0.00E-01	2.75E 02
MN	56	0.00E-01	3.08E 01	5.30E 00	0.00E-01	2.64E 01	0.00E-01	2.80E 03
FE	55	5.23E 02	3.38E 02	9.03E 01	0.00E-01	0.00E-01	1.65E 02	4.29E 01
FE	59	1.16E 03	2.02E 03	7.98E 02	0.00E-01	0.00E-01	5.98E 02	9.67E 02
CO	58	0.00E-01	1.35E 02	3.38E 02	0.00E-01	0.00E-01	0.00E-01	3.37E 02
CO	60	0.00E-01	4.06E 02	9.59E 02	0.00E-01	0.00E-01	0.00E-01	9.67E 02
NI	63	2.39E 04	1.47E 03	8.28E 02	0.00E-01	0.00E-01	0.00E-01	7.34E 01
NI	65	1.77E 02	2.00E 01	9.10E 00	0.00E-01	0.00E-01	0.00E-01	1.52E 03
CU	64	0.00E-01	2.29E 01	1.06E 01	0.00E-01	3.87E 01	0.00E-01	4.70E 02
ZN	65	6.92E 02	2.37E 03	1.09E 03	0.00E-01	1.15E 03	0.00E-01	2.01E 03
ZN	69	3.51E 00	6.32E 00	4.70E-01	0.00E-01	2.63E 00	0.00E-01	5.15E 02
BR	83	0.00E-01	0.00E-01	1.37E 01	0.00E-01	0.00E-01	0.00E-01	3.76E-17
BR	84	0.00E-01	0.00E-01	1.44E 01	0.00E-01	0.00E-01	0.00E-01	3.76E-17
BR	85	0.00E-01	0.00E-01	7.30E-01	0.00E-01	0.00E-01	0.00E-01	3.76E-17
RB	86	0.00E-01	6.40E 03	3.16E 03	0.00E-01	0.00E-01	0.00E-01	1.64E 02
RB	88	0.00E-01	1.87E 01	1.03E 01	0.00E-01	0.00E-01	0.00E-01	1.82E 01
RB	89	0.00E-01	1.08E 01	7.41E 00	0.00E-01	0.00E-01	0.00E-01	3.66E 00
SR	89	9.44E 04	0.00E-01	2.71E 03	0.00E-01	0.00E-01	0.00E-01	1.94E 03
SR	90	6.96E 05	0.00E-01	1.77E 05	0.00E-01	0.00E-01	0.00E-01	8.69E 03
SR	91	1.88E 03	0.00E-01	6.81E 00	0.00E-01	0.00E-01	0.00E-01	2.23E 03
SR	92	7.22E 02	0.00E-01	2.68E 01	0.00E-01	0.00E-01	0.00E-01	7.79E 03
Y	90	3.27E 00	0.00E-01	8.77E-02	0.00E-01	0.00E-01	0.00E-01	4.51E 03
Y	91M	3.05E-02	0.00E-01	1.04E-03	0.00E-01	0.00E-01	0.00E-01	1.02E 02
Y	91	4.25E 01	0.00E-01	1.13E 00	0.00E-01	0.00E-01	0.00E-01	3.05E 03
Y	92	2.88E-01	0.00E-01	8.09E-03	0.00E-01	0.00E-01	0.00E-01	5.49E 03
Y	93	9.14E-01	0.00E-01	2.49E-02	0.00E-01	0.00E-01	0.00E-01	7.22E 03
ZR	95	7.75E 00	1.89E 00	1.34E 00	0.00E-01	2.04E 00	0.00E-01	9.41E 02
ZR	97	5.57E-01	9.56E-02	4.36E-02	0.00E-01	9.63E-02	0.00E-01	6.09E 03
NB	95	1.58E 00	6.51E-01	3.76E-01	0.00E-01	4.66E-01	0.00E-01	5.49E 02
MO	99	0.00E-01	1.28E 03	2.49E 02	0.00E-01	1.91E 03	0.00E-01	4.21E 02
TC	99M	7.22E-02	1.49E-01	1.92E 00	0.00E-01	1.60E 00	7.79E-02	4.33E 01

ATTACHMENT A  
(Page 107 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.4-4 (cont'd)  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
INFANT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	8.54E-02	1.08E-01	1.06E 00	0.00E-01	1.28E 00	5.87E-02	1.83E 01
RU	103	5.57E 01	0.00E-01	1.86E 01	0.00E-01	1.16E 02	0.00E-01	6.77E 02
RU	105	5.12E 00	0.00E-01	1.72E 00	0.00E-01	3.76E 01	0.00E-01	2.04E 03
RU	106	9.07E 02	0.00E-01	1.13E 02	0.00E-01	1.07E 03	0.00E-01	6.88E 03
AG	110M	3.75E 01	2.73E 01	1.81E 01	0.00E-01	3.91E 01	0.00E-01	1.42E 03
TE	125M	8.77E 02	2.93E 02	1.19E 02	2.95E 02	0.00E-01	0.00E-01	4.18E 02
TE	127M	2.20E 03	7.30E 02	2.66E 02	6.36E 02	5.42E 03	0.00E-01	8.88E 02
TE	127	3.76E 01	1.26E 01	8.09E 00	3.06E 01	9.18E 01	0.00E-01	7.90E 02
TE	129M	3.76E 03	1.29E 03	5.79E 02	1.44E 03	9.41E 03	0.00E-01	2.25E 03
TE	129	1.07E 01	3.68E 00	2.49E 00	8.95E 00	2.66E 01	0.00E-01	8.54E 02
TE	131M	5.72E 02	2.30E 02	1.90E 02	4.66E 02	1.58E 03	0.00E-01	3.87E 03
TE	131	6.62E 00	2.45E 00	1.86E 00	5.91E 00	1.69E 01	0.00E-01	2.67E 02
TE	132	7.82E 02	3.87E 02	3.62E 02	5.72E 02	2.42E 03	0.00E-01	1.43E 03
I	130	2.26E 02	4.97E 02	1.99E 02	5.57E 04	5.45E 02	0.00E-01	1.06E 02
I	131	1.35E 03	1.59E 03	7.00E 02	5.23E 05	1.86E 03	0.00E-01	5.68E 01
I	132	6.24E 01	1.27E 02	4.51E 01	5.94E 03	1.41E 02	0.00E-01	1.03E 02
I	133	4.70E 02	6.85E 02	2.01E 02	1.25E 05	8.05E 02	0.00E-01	1.16E 02
I	134	3.27E 01	6.70E 01	2.38E 01	1.56E 03	7.49E 01	0.00E-01	6.92E 01
I	135	1.37E 02	2.72E 02	9.93E 01	2.44E 04	3.04E 02	0.00E-01	9.86E 01
CS	134	1.42E 04	2.64E 04	2.67E 03	0.00E-01	6.81E 03	2.42E 03	7.19E 01
CS	136	1.73E 03	5.08E 03	1.90E 03	0.00E-01	2.02E 03	4.14E 02	7.71E 01
CS	137	1.96E 04	2.30E 04	1.63E 03	0.00E-01	6.17E 03	2.50E 03	7.19E 01
CS	138	1.81E 01	2.94E 01	1.43E 01	0.00E-01	1.47E 01	2.29E 00	4.70E 01
BA	139	3.31E 01	2.20E-02	9.59E-01	0.00E-01	1.32E-02	1.33E-02	2.10E 03
BA	140	6.43E 03	6.43E 00	3.31E 02	0.00E-01	1.53E 00	3.95E 00	1.58E 03
BA	141	1.60E 01	1.09E-02	5.04E-01	0.00E-01	6.58E-03	6.66E-03	1.95E 02
BA	142	6.92E 00	5.76E-03	3.41E-01	0.00E-01	3.31E-03	3.48E-03	2.86E 01
LA	140	7.94E-01	3.13E-01	8.05E-02	0.00E-01	0.00E-01	0.00E-01	3.68E 03
LA	142	4.14E-02	1.52E-02	3.64E-03	0.00E-01	0.00E-01	0.00E-01	2.58E 03
CE	141	2.96E 00	1.81E 00	2.13E-01	0.00E-01	5.57E-01	0.00E-01	9.33E 02
CE	143	5.57E-01	3.69E 02	4.21E-02	0.00E-01	1.08E-01	0.00E-01	2.16E 03
CE	144	1.12E 02	4.59E 01	6.28E 00	0.00E-01	1.85E 01	0.00E-01	6.43E 03
PR	143	3.06E 00	1.14E 00	1.52E-01	0.00E-01	4.25E-01	0.00E-01	1.61E 03
PR	144	1.03E-02	3.99E-03	5.19E-04	0.00E-01	1.44E-03	0.00E-01	1.85E 02
ND	147	2.08E 00	2.14E 00	1.31E-01	0.00E-01	8.24E-01	0.00E-01	1.35E 03
W	187	3.40E 01	2.36E 01	8.16E 00	0.00E-01	0.00E-01	0.00E-01	1.39E 03

ATTACHMENT A  
(Page 108 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.4-4 (cont'd)**  
SITE RELATED DOSE COMMITMENT FACTOR AIT  
MREM/HR PER  $\mu$ CI/ML  
INFANT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
NP	239	4.18E-01	3.74E-02	2.11E-02	0.00E-01	7.45E-02	0.00E-01	1.08E 03
Sb	124	8.05E 02	1.19E 01	2.49E 02	2.14E 00	0.00E-01	5.04E 02	2.48E 03
Sb	125	4.63E 02	4.48E 00	9.52E 01	5.79E-00	0.00E-01	2.90E 02	6.17E 02
Sb	126	3.03E 02	5.94E 00	1.09E 02	2.33E 00	0.00E-01	1.91E 02	3.14E 03
Co	57	0.00E-01	4.33E 01	7.03E 01	0.00E-01	0.00E-01	0.00E-01	1.47E 02

ATTACHMENT A  
(Page 109 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-1

INHALATION DOSE PARAMETER FOR THE CHILD, PI  
MREM/YR per  $\mu\text{Ci}/\text{M}^3$

	1.12E 03	RU-103	6.62E 05
C-14	3.59E 04	RU-105	9.95E 04
NA-24	1.61E 04	RU-106	1.43E 07
P-32	2.60E 06	AG-110M	5.48E 06
CR-51	1.70E 04	TE-125M	4.77E 05
MN-54	1.58E 06	TE-127M	1.48E 06
MN-56	1.23E 05	TE-127	5.62E 04
FE-55	1.11E 05	TE-129M	1.76E 06
FE-59	1.27E 06	TE-129	2.55E 04
CO-58	1.11E 06	TE-131M	3.08E 05
CO-60	7.07E 06	TE-131	2.05E 03
NI-63	8.21E 05	TE-132	3.77E 05
NI-65	8.40E 04	I-130	1.85E 06
CU-64	3.67E 04	I-131	1.62E 07
ZN-65	9.95E 05	I-132	1.94E 05
ZN-69	1.02E 04	I-133	3.85E 06
BR-83	4.74E 02	I-134	5.07E 04
BR-84	5.48E 02	I-135	7.92E 05
BR-85	2.53E 01	CS-134	1.01E 06
RB-86	1.98E 05	CS-136	1.71E 05
RB-88	5.62E 02	CS-137	9.07E 05
RB-89	3.45E 02	CS-138	8.40E 02
SR-89	2.16E 06	BA-139	5.77E 04
SR-90	1.01E 08	BA-140	1.74E 06
SR-91	1.74E 05	BA-141	2.92E 03
SR-92	2.42E 05	BA-142	1.64E 03
Y-90	2.68E 05	LA-140	2.26E 05
Y-91M	2.81E 03	LA-142	7.59E 04
Y-92	2.39E 05	CE-141	5.44E 05
Y-93	3.89E 05	CE-143	1.27E 05
ZR-95	2.23E 06	CE-144	1.20E 07
ZR-97	3.51E 05	PR-143	4.33E 05
NB-95	6.14E 05	PR-144	1.57E 03
MO-99	1.35E 05	ND-147	3.28E 05
TC-99M	4.81E 03	W-187	9.10E 04
TC-101	5.85E 02	NP-239	6.40E 04

ATTACHMENT A  
(Page 110 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-2  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
ADULT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E 01	1.26E 03	1.26E 03	1.26E 03	1.26E 03	1.26E 03	1.26E 03
C	14	1.82E 04	3.41E 03	3.41E 03	3.41E 03	3.41E 03	3.41E 03	3.41E 03
NA	24	1.02E 04	1.02E 04	1.02E 04	1.02E 04	1.02E 04	1.02E 04	1.02E 04
P	32	1.32E 06	7.71E 04	5.01E 04	0.00E-01	0.00E-01	0.00E-01	8.64E 04
CR	51	0.00E 01	0.00E 01	1.00E 02	5.95E 01	2.28E 01	1.44E 04	3.32E 03
MN	54	0.00E 01	3.96E 04	6.30E 03	0.00E-01	9.84E 03	1.40E 06	7.74E 04
MN	56	0.00E 01	1.24E 00	1.83E-00	0.00E-01	1.30E 00	9.44E 03	2.02E 04
FE	55	2.46E 04	1.70E 04	3.94E 03	0.00E-01	0.00E-01	7.21E 04	6.03E 03
FE	59	1.18E 04	2.78E 04	1.06E 04	0.00E-01	0.00E-01	1.02E 06	1.88E 05
CO	58	0.00E 01	1.58E 03	2.07E 03	0.00E-01	0.00E-01	9.28E 05	1.06E 05
CO	60	0.00E 01	1.15E 04	1.48E 04	0.00E-01	0.00E-01	5.97E 06	2.85E 05
NI	63	4.32E 05	3.14E 04	1.45E 04	0.00E-01	0.00E-01	1.78E 05	1.34E 04
NI	65	1.54E 00	2.10E-01	9.12E-02	0.00E-01	0.00E-01	5.60E 03	1.23E 04
CU	64	0.00E 01	1.46E 00	6.15E-01	0.00E-01	4.62E 00	6.78E 03	4.90E 04
ZN	65	3.24E 04	1.03E 05	4.66E 04	0.00E-01	6.90E 04	8.64E 05	5.34E 04
ZN	69	3.38E-02	6.51E-02	4.52E-03	0.00E-01	4.22E-02	9.20E 02	1.63E 01
BR	83	0.00E-01	0.00E-01	2.41E 02	0.00E-01	0.00E-01	0.00E-01	2.32E 02
BR	84	0.00E-01	0.00E-01	3.13E 02	0.00E-01	0.00E-01	0.00E-01	1.64E-03
BR	85	0.00E-01	0.00E-01	1.28E 01	0.00E-01	0.00E-01	0.00E-01	8.00E-15
RB	86	0.00E-01	1.35E 05	5.90E 04	0.00E-01	0.00E-01	0.00E-01	1.66E 04
RB	88	0.00E-01	3.87E 02	1.93E 02	0.00E-01	0.00E-01	0.00E-01	3.34E-09
RB	89	0.00E-01	2.56E 02	1.70E 02	0.00E-01	0.00E-01	0.00E-01	9.28E-12
SR	89	3.04E 05	0.00E-01	8.72E 03	0.00E-01	0.00E-01	1.40E 06	3.50E 05
SR	90	9.92E 07	0.00E-01	6.10E 06	0.00E-01	0.00E-01	9.60E 06	7.22E 05
SR	91	6.19E 01	0.00E-01	2.50E 00	0.00E-01	0.00E-01	3.65E 04	1.91E 05
SR	92	6.74E 00	0.00E-01	2.91E-01	0.00E-01	0.00E-01	1.65E 04	4.30E 04
Y	90	2.09E 03	0.00E-01	5.61E 01	0.00E-01	0.00E-01	1.70E 05	5.06E 05
Y	91M	2.61E-01	0.00E-01	1.02E-02	0.00E-01	0.00E-01	1.92E 03	1.33E 00
Y	91	4.62E 05	0.00E-01	1.24E 04	0.00E-01	0.00E-01	1.70E 06	3.85E 05
Y	92	1.03E 01	0.00E-01	3.02E-01	0.00E-01	0.00E-01	1.57E 04	7.35E 04
Y	93	9.44E 01	0.00E-01	2.61E 00	0.00E-01	0.00E-01	4.85E 04	4.22E 05
ZR	95	1.07E 05	3.44E 04	2.33E 04	0.00E-01	5.42E 04	1.77E 06	1.50E 05
ZR	97	9.68E 01	1.96E 01	9.04E 00	0.00E-01	2.97E 01	7.87E 04	5.23E 05
NB	95	1.41E 04	7.82E 03	4.21E 03	0.00E-01	7.74E 03	5.05E 05	1.04E 05
MO	99	0.00E-01	1.21E 02	2.30E 01	0.00E-01	2.91E 02	9.12E 04	2.48E 05
TC	99M	1.03E-03	2.91E-03	3.70E-02	0.00E-01	4.42E-02	7.64E 02	4.16E 03

ATTACHMENT A  
(Page 111 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-2 (cont'd)  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{CI}/\text{M}^3$   
ADULT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	4.18E-05	6.02E-05	5.90E-04	0.00E-01	1.08E-03	3.99E 02	1.09E-11
RU	103	1.53E 03	0.00E-01	6.58E 02	0.00E-01	5.83E 03	5.05E 05	1.10E 05
RU	105	7.90E-01	0.00E-01	3.11E-01	0.00E-01	1.02E 00	1.10E 04	4.82E 04
RU	106	6.91E 04	0.00E-01	8.72E 03	0.00E-01	1.34E 05	9.36E 06	9.12E 05
AG	110M	1.08E 04	1.00E 04	5.94E 03	0.00E-01	1.97E 04	4.63E 06	3.02E 05
TE	125M	3.42E 03	1.58E 03	4.67E 02	1.05E 03	1.24E 04	3.14E 05	7.06E 04
TE	127M	1.26E 04	5.77E 03	1.57E 03	3.29E 03	4.58E 04	9.60E 05	1.50E 05
TE	127	1.40E 00	6.42E-01	3.10E-01	1.06E 00	5.10E 00	6.51E 03	5.74E 04
TE	129M	9.76E 03	4.67E 03	1.58E 03	3.44E 03	3.66E 04	1.16E 06	3.83E 05
TE	129	4.98E-02	2.39E-02	1.24E-02	3.90E-02	1.87E-01	1.94E 03	1.57E 02
TE	131M	6.99E 01	4.36E 01	2.90E 01	5.50E 01	3.09E 02	1.46E 05	5.56E 05
TE	131	1.11E-02	5.95E-03	3.59E-03	9.36E-02	4.37E-02	1.39E-03	1.84E 01
TE	132	2.60E 02	2.15E 02	1.62E 02	1.90E 02	1.46E 03	2.88E 05	5.10E 05
I	130	4.58E 03	1.34E 04	5.28E 03	1.14E 06	2.09E 04	0.00E-01	7.69E 05
I	131	2.52E 04	3.58E 04	2.05E 04	1.19E 07	6.13E 04	0.00E-01	6.28E 03
I	132	1.16E 03	3.26E 03	1.16E 03	1.14E 05	5.18E 03	0.00E-01	4.06E 02
I	133	8.64E 03	1.48E 04	4.52E 03	2.15E 06	2.58E 04	0.00E-01	8.88E 03
I	134	6.44E 02	1.73E 03	6.15E 02	2.98E 04	2.75E 03	0.00E-01	1.01E 00
I	135	2.68E 03	6.98E 03	2.57E 03	4.48E 05	1.11E 04	0.00E-01	5.25E 03
CS	134	3.73E 05	8.48E 05	7.28E 05	0.00E-01	2.87E 05	9.76E 04	1.04E 04
CS	136	3.90E 04	1.46E 05	1.10E 05	0.00E-01	8.56E 04	1.20E 04	1.17E 04
CS	137	4.78E 05	6.21E 05	4.28E 05	0.00E-01	2.22E 05	7.52E 04	8.40E 03
CS	138	3.31E 02	6.21E 02	3.24E 02	0.00E-01	4.80E 02	4.86E 01	1.86E-03
BA	139	9.36E-01	6.66E-04	2.74E-02	0.00E-01	6.22E-04	3.76E 03	8.96E 02
BA	140	3.90E 04	4.90E 01	2.57E 03	0.00E-01	1.67E 01	1.27E 06	2.18E 05
BA	141	1.00E-01	7.53E-05	3.36E-03	0.00E-01	7.00E-05	1.94E 03	1.16E-07
BA	142	2.63E-02	2.70E-05	1.66E-03	0.00E-01	2.29E-05	1.19E 03	1.57E-16
LA	140	3.44E 02	1.74E 02	4.58E 01	0.00E-01	0.00E-01	1.36E 05	4.58E 05
LA	142	6.83E-01	3.10E-01	7.72E-02	0.00E-01	0.00E-01	6.33E 03	2.11E 03
CE	141	1.99E 04	1.35E 04	1.53E 03	0.00E-01	6.26E 03	3.62E 05	1.20E 05
CE	143	1.86E 02	1.38E 02	1.53E 01	0.00E-01	6.08E 01	7.98E 04	2.26E 05
CE	144	3.43E 06	1.43E 06	1.84E 05	0.00E-01	8.48E 05	7.78E 06	8.16E 05
PR	143	9.36E 03	3.75E 03	4.64E 02	0.00E-01	2.16E 03	2.81E 05	2.00E 05
PR	144	3.10E-02	1.25E-02	1.53E-03	0.00E-01	7.05E-03	1.02E 03	2.15E-08
ND	147	5.27E 03	6.10E 03	3.65E 02	0.00E-01	3.56E 03	2.21E 05	1.73E 05
W	187	8.48E 00	7.08E 00	2.48E 00	0.00E-01	0.00E-01	2.90E 04	1.55E 05
NP	239	2.30E 02	2.26E 01	1.24E 01	0.00E-01	7.00E 01	3.76E 04	1.19E 05



ATTACHMENT A  
(Page 112 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-3  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.27E 03	1.27E 03	1.27E 03	1.27E 03	1.27E 03	1.27E 03
C	14	2.60E 04	4.87E 03	4.87E 03	4.87E 03	4.87E 03	4.87E 03	4.87E 03
NA	24	1.38E 04	1.38E 04	1.38E 04	1.38E 04	1.38E 04	1.38E 04	1.38E 04
P	32	1.89E 06	1.10E 05	7.16E 04	0.00E-01	0.00E-01	0.00E-01	9.28E 04
CR	51	0.00E-01	0.00E-01	1.35E 02	7.50E 01	3.07E 01	2.10E 04	3.00E 03
MN	54	0.00E-01	5.11E 04	8.40E 03	0.00E-01	1.27E 04	1.98E 06	6.68E 04
MN	56	0.00E-01	1.70E 00	2.52E-01	0.00E-01	1.79E 00	1.53E 04	5.74E 04
FE	55	3.34E 04	2.38E 04	5.54E 03	0.00E-01	0.00E-01	1.24E 05	6.39E 03
FE	59	1.59E 04	3.70E 04	1.43E 04	0.00E-01	0.00E-01	1.53E 06	1.78E 05
CO	58	0.00E-01	2.07E 03	2.78E 03	0.00E-01	0.00E-01	1.34E 06	9.52E 04
CO	60	0.00E-01	1.51E 04	1.98E 04	0.00E-01	0.00E-01	8.72E 06	2.59E 05
NI	63	5.80E 05	4.34E 04	1.98E 04	0.00E-01	0.00E-01	3.07E 05	1.42E 04
NI	65	2.18E 00	2.93E-01	1.27E-01	0.00E-01	0.00E-01	9.36E 03	3.67E 04
CU	64	0.00E-01	2.03E 00	8.48E-01	0.00E-01	6.41E 00	1.11E 04	6.14E 04
ZN	65	3.86E 04	1.34E 05	6.24E 04	0.00E-01	8.64E 04	1.24E 06	4.66E 04
ZN	69	4.83E-02	9.20E-02	6.46E-03	0.00E-01	6.02E-02	1.58E 03	2.85E 02
BR	83	0.00E-01	0.00E-01	3.44E 02	0.00E-01	0.00E-01	0.00E-01	8.00E-15
BR	84	0.00E-01	0.00E-01	4.33E 02	0.00E-01	0.00E-01	0.00E-01	8.00E-15
BR	85	0.00E-01	0.00E-01	1.83E 01	0.00E-01	0.00E-01	0.00E-01	8.00E-15
RB	86	0.00E-01	1.90E 05	8.40E 04	0.00E-01	0.00E-01	0.00E-01	1.77E 04
RB	88	0.00E-01	5.46E 02	2.72E 02	0.00E-01	0.00E-01	0.00E-01	2.92E-05
RB	89	0.00E-01	3.52E 02	2.33E 02	0.00E-01	0.00E-01	0.00E-01	3.38E-07
SR	89	4.34E 05	0.00E-01	1.25E 04	0.00E-01	0.00E-01	2.42E 06	3.71E 05
SR	90	1.08E 08	0.00E-01	6.68E 06	0.00E-01	0.00E-01	1.65E 07	7.65E 05
SR	91	8.80E 01	0.00E-01	3.51E 00	0.00E-01	0.00E-01	6.07E 04	2.59E 05
SR	92	9.52E 00	0.00E-01	4.06E-01	0.00E-01	0.00E-01	2.74E 04	1.19E 05
Y	90	2.98E 03	0.00E-01	8.00E 01	0.00E-01	0.00E-01	2.93E 05	5.59E 05
Y	91M	3.70E-01	0.00E-01	1.42E-02	0.00E-01	0.00E-01	3.20E 03	3.02E 01
Y	91	6.61E 05	0.00E-01	1.77E 04	0.00E-01	0.00E-01	2.94E 06	4.09E 05
Y	92	1.47E 01	0.00E-01	4.29E-01	0.00E-01	0.00E-01	2.68E 04	1.65E 05
Y	93	1.35E 02	0.00E-01	3.72E 00	0.00E-01	0.00E-01	8.32E 04	5.79E 05
ZR	95	1.46E 05	4.58E 04	3.15E 04	0.00E-01	6.74E 04	2.69E 06	1.49E 05
ZR	97	1.38E 02	2.72E 01	1.26E 01	0.00E-01	4.12E 01	1.30E 05	6.30E 05
NB	95	1.86E 04	1.03E 04	5.66E 03	0.00E-01	1.00E 04	7.51E 05	9.68E 04
MO	99	0.00E-01	1.69E 02	3.22E 01	0.00E-01	4.11E 02	1.54E 05	2.69E 05
TC	99M	1.38E-03	3.86E-03	4.99E-02	0.00E-01	5.76E-02	1.15E 03	6.13E 03

ATTACHMENT A  
(Page 113 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-3 (cont'd)  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	5.92E-05	8.40E-05	8.24E-04	0.00E-01	1.52E-03	6.67E 02	8.72E-07
RU	103	2.10E 03	0.00E-01	8.96E 02	0.00E-01	7.43E 03	7.83E 05	1.09E 05
RU	105	1.12E 00	0.00E-01	4.34E-01	0.00E-01	1.41E 00	1.82E 04	9.04E 04
RU	106	9.84E 04	0.00E-01	1.24E 04	0.00E-01	1.90E 05	1.61E 07	9.60E 05
AG	110M	1.38E 04	1.31E 04	7.99E 03	0.00E-01	2.50E 04	6.75E 06	2.73E 05
TE	125M	4.88E 03	2.24E 03	6.74E 02	1.40E 03	0.00E-01	5.36E 05	7.50E 04
TE	127M	1.80E 04	8.16E 03	2.18E 03	4.38E 03	6.54E 04	1.66E 06	1.59E 05
TE	127	2.01E 00	9.12E-01	4.42E-01	1.42E 00	7.28E 00	1.12E 04	8.08E 01
TE	129M	1.39E 04	6.58E 03	2.25E 03	4.58E 03	5.19E 04	1.98E 06	4.05E 05
TE	129	7.10E-02	3.38E-02	1.76E-02	5.18E-02	2.66E-01	3.30E 03	1.62E 03
TE	131M	9.84E 01	6.01E 01	4.20E 01	7.25E 01	4.39E 02	2.38E 05	6.21E 05
TE	131	1.58E-02	8.32E-03	5.04E-03	1.24E-02	6.18E-02	2.34E 03	1.51E 01
TE	132	3.60E 02	2.90E 02	2.19E 02	2.46E 02	1.95E 03	4.49E 05	4.63E 05
I	130	6.24E 03	1.79E 04	7.17E 03	1.49E 06	2.75E 04	0.00E-01	9.12E 03
I	131	3.54E 04	4.91E 04	2.64E 04	1.46E 07	8.40E 04	0.00E-01	6.49E 03
I	132	1.59E 03	4.38E 03	1.58E 03	1.51E 05	6.92E 03	0.00E-01	1.27E 03
I	133	1.22E 04	2.05E 04	6.22E 03	2.92E 06	3.59E 04	0.00E-01	1.03E 04
I	134	8.88E 02	2.32E 03	8.40E 02	3.95E 04	3.66E 03	0.00E-01	2.04E 01
I	135	3.70E 03	9.44E 03	3.49E 03	6.21E 05	1.49E 04	0.00E-01	6.95E 03
CS	134	5.02E 05	1.13E 06	5.49E 05	0.00E-01	3.75E 05	1.46E 05	9.76E 03
CS	136	5.15E 04	1.94E 05	1.37E 05	0.00E-01	1.10E 05	1.78E 04	1.09E 04
CS	137	6.70E 05	8.48E 05	3.11E 05	0.00E-01	3.04E 05	1.21E 05	8.48E 03
CS	138	4.66E 02	8.56E 02	4.46E 02	0.00E-01	6.62E 02	7.87E 01	2.70E-01
BA	139	1.34E 00	9.44E-04	3.90E-02	0.00E-01	8.88E-04	6.46E 03	6.45E 03
BA	140	5.47E 04	6.70E 01	3.52E 03	0.00E-01	2.28E 01	2.03E 06	2.29E 05
BA	141	1.42E-01	1.06E-04	4.74E-03	0.00E-01	9.84E-05	3.29E 03	7.46E-04
BA	142	3.70E-02	3.70E-05	2.27E-03	0.00E-01	3.14E-05	1.91E 03	4.79E-10
LA	140	4.79E 02	2.36E 02	6.26E 01	0.00E-01	0.00E-01	2.14E 05	4.87E 05
LA	142	9.60E-01	4.25E-01	1.06E-01	0.00E-01	0.00E-01	1.02E 04	1.20E 04
CE	141	2.84E 04	1.90E 04	2.17E 03	0.00E-01	8.88E 03	6.14E 05	1.26E 05
CE	143	2.66E 02	1.94E 02	2.16E 01	0.00E-01	8.64E 01	1.30E 05	2.55E 05
CE	144	4.89E 06	2.02E 06	2.62E 05	0.00E-01	1.21E 06	1.34E 07	8.64E 05
PR	143	1.34E 04	5.31E 03	6.62E 02	0.00E-01	3.09E 03	4.83E 05	2.14E 05
PR	144	4.30E-02	1.76E-02	2.18E-03	0.00E-01	1.01E-02	1.75E 03	2.35E-04
ND	147	7.86E 03	8.56E 03	5.13E 02	0.00E-01	5.02E 03	3.72E 05	1.82E 05
W	187	1.20E 01	9.76E 00	3.43E 00	0.00E-01	0.00E-01	4.74E 04	1.77E 05
NP	239	3.38E 02	3.19E 01	1.77E 01	0.00E-01	1.00E 02	6.49E 04	1.32E 05

ATTACHMENT A  
(Page 114 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-4  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.12E 03	1.12E 03	1.12E 03	1.12E 03	1.12E 03	1.12E 03
C	14	3.59E 04	6.73E 03	6.73E 03	6.73E 03	6.73E 03	6.73E 03	6.73E 03
NA	24	1.61E 04	1.61E 04	1.61E 04	1.61E 04	1.61E 04	1.61E 04	1.61E 04
P	32	2.60E 06	1.14E 05	9.88E 04	0.00E-01	0.00E-01	0.00E-01	4.22E 04
CR	51	0.00E-01	0.00E-01	1.54E 02	8.55E 01	2.43E 01	1.70E 04	1.08E 03
MN	54	0.00E-01	4.29E 04	9.51E 03	0.00E-01	1.00E 04	1.58E 06	2.29E 04
MN	56	0.00E-01	1.66E 00	3.12E-01	0.00E-01	1.67E 00	1.31E 04	1.23E 05
FE	55	4.74E 04	2.52E 04	7.77E 03	0.00E-01	0.00E-01	1.11E 05	2.87E 03
FE	59	2.07E 04	3.34E 04	1.67E 04	0.00E-01	0.00E-01	1.27E 06	7.07E 04
CO	58	0.00E-01	1.77E 03	3.16E 03	0.00E-01	0.00E-01	1.11E 06	3.44E 04
CO	60	0.00E-01	1.31E 04	2.26E 04	0.00E-01	0.00E-01	7.07E 06	9.62E 04
NI	63	8.21E 05	4.63E 04	2.80E 04	0.00E-01	0.00E-01	2.75E 05	6.33E 03
NI	65	2.99E 00	2.96E-01	1.64E-01	0.00E-01	0.00E-01	8.18E 03	8.40E 04
CU	64	0.00E-01	1.99E 00	1.07E 00	0.00E-01	6.03E 00	9.58E 03	3.67E 04
ZN	65	4.26E 04	1.13E 05	7.03E 04	0.00E-01	7.14E 04	9.95E 05	1.63E 04
ZN	69	6.70E-02	9.66E-02	8.92E-03	0.00E-01	5.85E-02	1.42E 03	1.02E 04
BR	83	0.00E-01	0.00E-01	4.74E 02	0.00E-01	0.00E-01	0.00E-01	3.70E-15
BR	84	0.00E-01	0.00E-01	5.48E 02	0.00E-01	0.00E-01	0.00E-01	3.70E-15
BR	85	0.00E-01	0.00E-01	2.53E 01	0.00E-01	0.00E-01	0.00E-01	3.70E-15
RB	86	0.00E-01	1.98E 05	1.14E 05	0.00E-01	0.00E-01	0.00E-01	7.99E 03
RB	88	0.00E-01	5.62E 02	3.66E 02	0.00E-01	0.00E-01	0.00E-01	1.72E 01
RB	89	0.00E-01	3.45E 02	2.90E 02	0.00E-01	0.00E-01	0.00E-01	1.89E 00
SR	89	5.99E 05	0.00E-01	1.72E 04	0.00E-01	0.00E-01	2.16E 06	1.67E 05
SR	90	1.01E 08	0.00E-01	6.44E 06	0.00E-01	0.00E-01	1.48E 07	3.43E 05
SR	91	1.21E 02	0.00E-01	4.59E 00	0.00E-01	0.00E-01	5.33E 04	1.74E 05
SR	92	1.31E 01	0.00E-01	5.25E-01	0.00E-01	0.00E-01	2.40E 04	2.42E 05
Y	90	4.11E 03	0.00E-01	1.11E 02	0.00E-01	0.00E-01	2.62E 05	2.68E 05
Y	91M	5.07E-01	0.00E-01	1.84E-02	0.00E-01	0.00E-01	2.81E 03	1.72E 03
Y	91	9.14E 05	0.00E-01	2.44E 04	0.00E-01	0.00E-01	2.63E 06	1.84E 05
Y	92	2.04E 01	0.00E-01	5.81E-01	0.00E-01	0.00E-01	2.39E 04	2.39E 05
Y	93	1.86E 02	0.00E-01	5.11E 00	0.00E-01	0.00E-01	7.44E 04	3.89E 05
ZR	95	1.90E 05	4.18E 04	3.70E 04	0.00E-01	5.96E 04	2.23E 06	6.11E 04
ZR	97	1.88E 02	2.72E 01	1.60E 01	0.00E-01	3.88E 01	1.13E 05	3.51E 05
NB	95	2.35E 04	9.18E 03	6.55E 03	0.00E-01	8.62E 03	6.14E 05	3.70E 04
MO	99	0.00E-01	1.72E 02	4.25E 01	0.00E-01	3.92E 02	1.35E 05	1.27E 05
TC	99M	1.78E-03	3.48E-03	5.77E-02	0.00E-01	5.07E-02	9.51E 02	4.81E 03

ATTACHMENT A  
(Page 115 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-4 (cont'd)  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	8.10E-05	8.51E-05	1.08E-03	0.00E-01	1.45E-03	5.85E 02	1.63E 01
RU	103	2.79E 03	0.00E-01	1.07E 03	0.00E-01	7.03E 03	6.62E 05	4.48E 04
RU	105	1.53E 00	0.00E-01	5.55E-01	0.00E-01	1.34E 00	1.59E 04	9.95E 04
RU	106	1.36E 05	0.00E-01	1.69E 04	0.00E-01	1.84E 05	1.43E 07	4.29E 05
AG	110M	1.69E 04	1.14E 04	9.14E 03	0.00E-01	2.12E 04	5.48E 06	1.00E 05
TE	125M	6.73E 03	2.33E 03	9.14E 02	1.92E 03	0.00E-01	4.77E 05	3.38E 04
TE	127M	2.49E 04	8.55E 03	3.02E 03	6.07E 03	6.36E 04	1.48E 06	7.14E 04
TE	127	2.77E 00	9.51E-01	6.10E-01	1.96E 00	7.07E 00	1.00E 04	5.62E 04
TE	129M	1.92E 04	6.85E 03	3.04E 03	6.33E 03	5.03E 04	1.76E 06	1.82E 05
TE	129	9.77E-02	3.50E-02	2.38E-02	7.14E-02	2.57E-01	2.93E 03	2.55E 04
TE	131M	1.34E 02	5.92E 01	5.07E 01	9.77E 01	4.00E 02	2.06E 05	3.08E 05
TE	131	2.17E-02	8.44E-03	6.59E-03	1.70E-02	5.88E-02	2.05E 03	1.33E 03
TE	132	4.81E 02	2.72E 02	2.63E 02	3.17E 02	1.77E 03	3.77E 05	1.38E 05
I	130	8.18E 03	1.64E 04	8.44E 03	1.85E 06	2.45E 04	0.00E-01	5.11E 03
I	131	4.81E 04	4.81E 04	2.73E 04	1.62E 07	7.88E 04	0.00E-01	2.84E 03
I	132	2.12E 03	4.07E 03	1.88E 03	1.94E 05	6.25E 03	0.00E-01	3.20E 03
I	133	1.66E 04	2.03E 04	7.70E 03	3.85E 06	3.38E 04	0.00E-01	5.48E 03
I	134	1.17E 03	2.16E 03	9.95E 02	5.07E 04	3.30E 03	0.00E-01	9.55E 02
I	135	4.92E 03	8.73E 03	4.14E 03	7.92E 05	1.34E 04	0.00E-01	4.44E 03
CS	134	6.51E 05	1.01E 06	2.25E 05	0.00E-01	3.30E 05	1.21E 05	3.85E 03
CS	136	6.51E 04	1.71E 05	1.16E 05	0.00E-01	9.55E 04	1.45E 04	4.18E 03
CS	137	9.07E 05	8.25E 05	1.28E 05	0.00E-01	2.82E 05	1.04E 05	3.62E 03
CS	138	6.33E 02	8.40E 02	5.55E 02	0.00E-01	6.22E 02	6.81E 01	2.70E 02
BA	139	1.84E 00	9.84E-04	5.36E-02	0.00E-01	8.62E-04	5.77E 03	5.77E 04
BA	140	7.40E 04	6.48E 01	4.33E 03	0.00E-01	2.11E 01	1.74E 06	1.02E 05
BA	141	1.96E-01	1.09E-04	6.36E-03	0.00E-01	9.47E-05	2.92E 03	2.75E 02
BA	142	4.99E-02	3.60E-05	2.79E-03	0.00E-01	2.91E-05	1.64E 03	2.74E 00
LA	140	6.44E 02	2.25E 02	7.55E 01	0.00E-01	0.00E-01	1.83E 05	2.26E 05
LA	142	1.29E 00	4.11E-01	1.29E-01	0.00E-01	0.00E-01	8.70E 03	7.59E 04
CE	141	3.92E 04	1.95E 04	2.90E 03	0.00E-01	8.55E 03	5.44E 05	5.66E 04
CE	143	3.66E 02	1.99E 02	2.87E 01	0.00E-01	8.36E 01	1.15E 05	1.27E 05
CE	144	6.77E 06	2.12E 06	3.61E 05	0.00E-01	1.17E 06	1.20E 07	3.89E 05
PR	143	1.85E 04	5.55E 03	9.14E 02	0.00E-01	3.00E 03	4.33E 05	9.73E 04
PR	144	5.96E-02	1.85E-02	3.00E-03	0.00E-01	9.77E-03	1.57E 03	1.97E 02
ND	147	1.08E 04	8.73E 03	6.81E 02	0.00E-01	4.81E 03	3.28E 05	8.21E 04
W	187	1.63E 01	9.66E 00	4.33E 00	0.00E-01	0.00E-01	4.11E 04	9.10E 04
NP	239	4.66E 02	3.34E 01	2.35E 01	0.00E-01	9.73E 01	5.81E 04	6.40E 04

ATTACHMENT A  
(Page 116 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-5  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
INFANT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	6.47E 02	6.47E 02	6.47E 02	6.47E 02	6.47E 02	6.47E 02
C	14	2.65E 04	5.31E 03	5.31E 03	5.31E 03	5.31E 03	5.31E 03	5.31E 03
NA	24	1.06E 04	1.06E 04	1.06E 04	1.06E 04	1.06E 04	1.06E 04	1.06E 04
P	32	2.03E 06	1.12E 05	7.74E 04	0.00E-01	0.00E-01	0.00E-01	1.61E 04
CR	51	0.00E-01	0.00E-01	8.95E 01	5.75E 01	1.32E 01	1.28E 04	3.57E 02
MN	54	0.00E-01	2.53E 04	4.98E 03	0.00E-01	4.98E 03	1.00E 06	7.06E 03
MN	56	0.00E-01	1.54E 00	2.21E-01	0.00E-01	1.10E 00	1.25E 04	7.17E 04
FE	55	1.97E 04	1.17E 04	3.33E 03	0.00E-01	0.00E-01	8.69E 04	1.09E 03
FE	59	1.36E 04	2.35E 04	9.48E 03	0.00E-01	0.00E-01	1.02E 06	2.48E 04
CO	58	0.00E-01	1.22E 03	1.82E 03	0.00E-01	0.00E-01	7.77E 05	1.11E 04
CO	60	0.00E-01	8.02E 03	1.18E 04	0.00E-01	0.00E-01	4.51E 06	3.19E 04
NI	63	3.39E 05	2.04E 04	1.16E 04	0.00E-01	0.00E-01	2.09E 05	2.42E 03
NI	65	2.39E 00	2.84E-01	1.23E-01	0.00E-01	0.00E-01	8.12E 03	5.01E 04
CU	64	0.00E-01	1.88E 00	7.74E-01	0.00E-01	3.98E 00	9.30E 03	1.50E 04
ZN	65	1.93E 04	6.26E 04	3.11E 04	0.00E-01	3.25E 04	6.47E 05	5.14E 04
ZN	69	5.39E-02	9.67E-02	7.18E-03	0.00E-01	4.02E-02	1.47E 03	1.32E 04
BR	83	0.00E-01	0.00E-01	3.81E 02	0.00E-01	0.00E-01	0.00E-01	1.40E-15
BR	84	0.00E-01	0.00E-01	4.00E 02	0.00E-01	0.00E-01	0.00E-01	1.40E-15
BR	85	0.00E-01	0.00E-01	2.04E 01	0.00E-01	0.00E-01	0.00E-01	1.40E-15
RB	86	0.00E-01	1.90E 05	8.82E 04	0.00E-01	0.00E-01	0.00E-01	3.04E 03
RB	88	0.00E-01	5.57E 02	2.87E 02	0.00E-01	0.00E-01	0.00E-01	3.39E 02
RB	89	0.00E-01	3.21E 02	2.06E 02	0.00E-01	0.00E-01	0.00E-01	6.82E 01
SR	89	3.98E 05	0.00E-01	1.14E 04	0.00E-01	0.00E-01	2.03E 06	6.40E 04
SR	90	4.09E 07	0.00E-01	2.59E 06	0.00E-01	0.00E-01	1.12E 07	1.31E 05
SR	91	9.56E 01	0.00E-01	3.46E 00	0.00E-01	0.00E-01	5.26E 04	7.34E 04
SR	92	1.05E 01	0.00E-01	3.91E-01	0.00E-01	0.00E-01	2.38E 04	1.40E 05
Y	90	3.29E 03	0.00E-01	8.82E 01	0.00E-01	0.00E-01	2.69E 05	1.04E 05
Y	91M	4.07E-01	0.00E-01	1.39E-02	0.00E-01	0.00E-01	2.79E 03	2.35E 03
Y	91	5.88E 05	0.00E-01	1.57E 04	0.00E-01	0.00E-01	2.45E 06	7.03E 04
Y	92	1.64E 01	0.00E-01	4.61E-01	0.00E-01	0.00E-01	2.45E 04	1.27E-05
Y	93	1.50E 02	0.00E-01	4.07E 00	0.00E-01	0.00E-01	7.64E 04	1.67E 05
ZR	95	1.15E 05	2.79E 04	2.03E 04	0.00E-01	3.11E 04	1.75E 06	2.17E 04
ZR	97	1.50E 02	2.56E 01	1.17E 01	0.00E-01	2.59E 01	1.10E 05	1.40E 05
NB	95	1.57E 04	6.43E 03	3.78E 03	0.00E-01	4.72E 03	4.79E 05	1.27E 04
MO	99	0.00E-01	1.65E 02	3.23E 01	0.00E-01	2.65E 02	1.35E 05	4.87E 04
TC	99M	1.40E-04	2.88E-03	3.72E-02	0.00E-01	3.11E-02	8.11E 02	2.03E 03

ATTACHMENT A  
(Page 117 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-5 (cont'd)  
INHALATION PATHWAY FACTOR  
MREM/YR PER  $\mu\text{Ci}/\text{M}^3$   
INFANT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	6.51E-05	8.23E-05	8.12E-04	0.00E-01	9.79E-04	5.84E 02	8.44E 02
RU	103	2.02E 03	0.00E-01	6.79E 02	0.00E-01	4.24E 03	5.52E 05	1.61E 04
RU	105	1.22E 00	0.00E-01	4.10E-01	0.00E-01	8.99E-01	1.57E 04	4.84E 04
RU	106	8.68E 04	0.00E-01	1.09E 04	0.00E-01	1.07E 05	1.16E 07	1.64E 05
AG	110M	9.98E 03	7.22E 03	5.00E 03	0.00E-01	1.09E 04	3.67E 06	3.30E 04
TE	125M	4.76E 03	1.99E 03	6.58E 02	1.62E 03	0.00E-01	4.47E 05	1.29E 04
TE	127M	1.67E 04	6.90E 03	2.07E 03	4.87E 03	3.75E 04	1.31E 06	2.73E 04
TE	127	2.23E 00	9.53E-01	4.89E-01	1.85E 00	4.86E 00	1.03E 04	2.44E 04
TE	129M	1.41E 04	6.09E 03	2.23E 03	5.47E 03	3.18E 04	1.68E 06	6.90E 04
TE	129	7.88E-02	3.47E-02	1.88E-02	6.75E-02	1.75E-01	3.00E 03	2.63E 04
TE	131M	1.07E 02	5.50E 01	3.63E 01	8.93E 01	2.65E 02	1.99E 05	1.19E 05
TE	131	1.74E-02	8.22E-03	5.00E-03	1.58E-02	3.99E-02	2.06E 03	8.22E 03
TE	132	3.72E 02	2.37E 02	1.76E 02	2.79E 02	1.03E 03	3.40E 05	4.41E 04
I	130	6.36E 03	1.39E 04	5.57E 03	1.60E 06	1.53E 04	0.00E-01	1.99E 03
I	131	3.79E 04	4.44E 04	1.96E 04	1.48E 07	5.18E 04	0.00E-01	1.06E 03
I	132	1.69E 03	3.54E 03	1.26E 03	1.69E 05	3.95E 03	0.00E-01	1.90E 03
I	133	1.32E 04	1.92E 04	5.60E 03	3.56E 06	2.24E 04	0.00E-01	2.16E 03
I	134	9.21E 02	1.88E 03	6.65E 02	4.45E 04	2.09E 03	0.00E-01	1.29E 03
I	135	3.86E 03	7.60E 03	2.77E 03	6.96E 05	8.47E 03	0.00E-01	1.83E 03
CS	134	3.96E 05	7.03E 05	7.45E 04	0.00E-01	1.90E 05	7.97E 04	1.33E 03
CS	136	4.83E 04	1.35E 05	5.29E 04	0.00E-01	5.64E 04	1.18E 04	1.43E 03
CS	137	5.49E 05	6.12E 05	4.55E 04	0.00E-01	1.72E 05	7.13E 04	1.33E 03
CS	138	5.05E 02	7.81E 02	3.98E 02	0.00E-01	4.10E 02	6.54E 01	8.76E 02
BA	139	1.48E 00	9.84E-04	4.30E-02	0.00E-01	5.92E-04	5.95E 03	5.10E 04
BA	140	5.60E 04	5.60E 01	2.90E 03	0.00E-01	1.34E 01	1.60E 06	3.84E 04
BA	141	1.57E-01	1.08E-04	4.97E-03	0.00E-01	6.50E-05	2.97E 03	4.75E 03
BA	142	3.98E-02	3.30E-05	1.96E-03	0.00E-01	1.90E-05	1.55E 03	6.93E 02
LA	140	5.05E 02	2.00E 02	5.15E 01	0.00E-01	0.00E-01	1.68E 05	8.48E 04
LA	142	1.03E 00	3.77E-01	9.04E-02	0.00E-01	0.00E-01	8.22E 03	5.95E 04
CE	141	2.77E 04	1.67E 04	1.99E 03	0.00E-01	5.25E 03	5.17E 05	2.16E 04
CE	143	2.93E 02	1.93E 02	2.21E 01	0.00E-01	5.64E 01	1.16E 05	4.97E 04
CE	144	3.19E 06	1.21E 06	1.76E 05	0.00E-01	5.38E 05	9.84E 06	1.48E 05
PR	143	1.40E 04	5.24E 03	6.99E 02	0.00E-01	1.97E 03	4.33E 05	3.72E 04
PR	144	4.79E-02	1.85E-02	2.41E-03	0.00E-01	6.72E-03	1.61E 03	4.28E 03
ND	147	7.94E 03	8.13E 03	5.00E 02	0.00E-01	3.15E 03	3.22E 05	3.12E 04
W	187	1.30E 01	9.02E 00	3.12E 00	0.00E-01	0.00E-01	3.96E 05	3.56E 04
NP	239	3.71E 02	3.32E 01	1.88E 01	0.00E-01	6.62E 01	5.95E 04	2.49E 04

ATTACHMENT A  
(Page 118 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-6**  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	7.63E 02	7.63E 02	7.63E 02	7.63E 02	7.63E 02	7.63E 02
C	14	2.63E 08	5.27E 07	5.27E 07	5.27E 07	5.27E 07	5.27E 07	5.27E 07
NA	24	2.44E 06	2.44E 06	2.44E 06	2.44E 06	2.44E 06	2.44E 06	2.44E 06
P	32	1.71E 10	1.06E 09	6.60E 08	0.00E-01	0.00E-01	0.00E-01	1.92E 09
CR	51	0.00E-01	0.00E-01	2.86E 04	0.00E-01	6.30E 03	3.79E 04	7.19E 06
MN	54	0.00E-01	8.41E 06	1.61E 06	0.00E-01	0.00E-01	0.00E-01	2.58E 07
MN	56	0.00E-01	4.16E-03	7.38E-04	0.00E-01	5.28E-03	0.00E-01	1.33E-01
FE	55	2.51E 07	1.73E 07	4.04E 06	0.00E-01	0.00E-01	9.67E 06	9.95E 06
FE	59	2.97E 07	6.98E 07	2.68E 07	0.00E-01	0.00E-01	1.95E 07	2.33E 08
CO	58	0.00E-01	4.71E 06	1.06E 07	0.00E-01	0.00E-01	0.00E-01	9.56E 07
CO	60	0.00E-01	1.64E 07	3.62E 07	0.00E-01	0.00E-01	0.00E-01	3.08E 08
NI	63	6.73E 09	4.71E 08	2.26E 08	0.00E-01	0.00E-01	0.00E-01	9.73E 07
NI	65	4.63E-01	6.02E-02	2.75E-02	0.00E-01	0.00E-01	0.00E-01	1.53E 00
CU	64	0.00E-01	2.39E 04	1.12E 04	0.00E-01	6.02E 04	0.00E-01	2.03E 06
ZN	65	1.37E 09	4.37E 09	1.97E 09	0.00E-01	2.92E 09	0.00E-01	2.75E 09
ZN	69	5.22E-12	9.99E-12	6.95E-13	0.00E-01	6.49E-12	0.00E-01	1.50E-12
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	2.59E 09	1.21E 09	0.00E-01	0.00E-01	0.00E-01	5.12E 08
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	1.45E 09	0.00E-01	4.16E 07	0.00E-01	0.00E-01	0.00E-01	2.33E 08
SR	90	4.68E 10	0.00E-01	1.15E 10	0.00E-01	0.00E-01	0.00E-01	1.35E 09
SR	91	2.87E 04	0.00E-01	1.16E 03	0.00E-01	0.00E-01	0.00E-01	1.37E 05
SR	92	4.90E-01	0.00E-01	2.12E-02	0.00E-01	0.00E-01	0.00E-01	9.70E 00
Y	90	7.07E 01	0.00E-01	1.90E 00	0.00E-01	0.00E-01	0.00E-01	7.50E 05
Y	91M	6.03E-20	0.00E-01	2.34E-21	0.00E-01	0.00E-01	0.00E-01	1.77E-19
Y	91	8.59E 03	0.00E-01	2.30E 02	0.00E-01	0.00E-01	0.00E-01	4.73E 06
Y	92	5.59E-05	0.00E-01	1.63E-06	0.00E-01	0.00E-01	0.00E-01	9.79E-01
Y	93	2.33E-01	0.00E-01	6.44E-03	0.00E-01	0.00E-01	0.00E-01	7.39E 03
ZR	95	9.44E 02	3.03E 02	2.05E 02	0.00E-01	4.75E 02	0.00E-01	9.59E 05
ZR	97	4.33E-01	8.75E-05	4.00E-02	0.00E-01	1.32E-00	0.00E-01	2.71E 04
NB	95	8.26E 04	4.59E 04	2.47E 04	0.00E-01	4.54E 04	0.00E-01	2.79E 08
MO	99	0.00E-01	2.48E 07	4.71E 06	0.00E-01	5.61E 07	0.00E-01	5.74E 07
TC	99M	3.33E 00	9.40E 00	1.20E 02	0.00E-01	1.43E 02	4.60E 00	5.56E 03

ATTACHMENT A  
(Page 119 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-6 (cont'd)  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	1.02E 03	0.00E-01	4.38E 02	0.00E-01	3.88E 03	0.00E-01	1.19E 05
RU	105	8.58E-04	0.00E-01	3.39E-04	0.00E-01	1.11E-02	0.00E-01	5.25E-01
RU	106	2.04E 04	0.00E-01	2.58E 03	0.00E-01	3.94E 04	0.00E-01	1.32E 06
AG	110M	5.82E 07	5.39E 07	3.20E 07	0.00E-01	1.06E 08	0.00E-01	2.20E 10
TE	125M	1.63E 07	5.90E 06	2.18E 06	4.90E 06	6.63E 07	0.00E-01	6.50E 07
TE	127M	4.58E 07	1.64E 07	5.58E 06	1.17E 07	1.86E 08	0.00E-01	1.54E 08
TE	127	6.54E 02	2.35E 02	1.41E 02	4.84E 02	2.66E 03	0.00E-01	5.16E 04
TE	129M	6.02E 07	2.25E 07	9.53E 06	2.07E 07	2.51E 08	0.00E-01	3.03E 08
TE	129	2.84E-10	1.07E-10	6.29E-11	2.18E-10	1.19E-09	0.00E-01	2.14E-10
TE	131M	3.61E 05	1.77E 05	1.47E 05	2.80E 05	1.79E 06	0.00E-01	1.73E 07
TE	131	3.67E-33	1.53E-33	1.16E-33	3.01E-33	1.61E-32	0.00E-01	0.00E-01
TE	132	2.40E 06	1.55E 06	1.46E 06	1.72E 06	1.50E 07	0.00E-01	7.35E 07
I	130	4.20E 05	1.24E 06	4.89E 05	1.05E 08	1.94E 06	0.00E-01	1.07E 06
I	131	2.96E 08	4.24E 08	2.43E 08	1.39E 11	7.26E 08	0.00E-01	1.12E 08
I	132	1.65E-01	4.41E-01	1.54E-01	1.54E 01	7.02E-01	0.00E-01	8.28E-02
I	133	3.87E 06	6.73E 06	2.05E 06	9.90E 08	1.18E 07	0.00E-01	6.05E 06
I	134	2.03E-12	5.52E-12	1.98E-12	9.57E-11	8.78E-12	0.00E-01	4.81E-15
I	135	1.29E 04	3.37E 04	1.24E 04	2.22E 06	5.40E 04	0.00E-01	3.80E 04
CS	134	5.65E 09	1.35E 10	1.10E 10	0.00E-01	4.35E 09	1.45E 09	2.35E 08
CS	136	2.61E 08	1.03E 09	7.42E 08	0.00E-01	5.73E 08	7.86E 07	1.17E 08
CS	137	7.38E 09	1.01E 10	6.61E 09	0.00E-01	3.43E 09	1.14E 09	1.95E 08
CS	138	9.16E-24	1.81E-23	8.97E-24	0.00E-01	1.33E-23	1.31E-24	7.72E-29
BA	139	4.56E-08	3.25E-11	1.34E-09	0.00E-01	3.04E-11	1.84E-11	8.09E-08
BA	140	2.69E 07	3.38E 04	1.76E 06	0.00E-01	1.15E 04	1.93E 04	5.54E 07
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	4.52E 00	2.28E 00	6.02E-01	0.00E-01	0.00E-01	0.00E-01	1.67E 05
LA	142	9.39E-12	4.27E-12	1.06E-12	0.00E-01	0.00E-01	0.00E-01	3.12E-08
CE	141	4.84E 03	3.28E 03	3.72E 02	0.00E-01	1.52E 03	0.00E-01	1.25E 07
CE	143	4.16E 01	3.07E 04	3.40E 00	0.00E-01	1.35E 01	0.00E-01	1.15E 06
CE	144	3.58E 05	1.50E 05	1.92E 04	0.00E-01	8.87E 04	0.00E-01	1.21E 08
PR	143	1.58E 02	6.33E 01	7.83E 00	0.00E-01	3.66E 01	0.00E-01	6.92E 05
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	9.46E 01	1.09E 02	6.55E 00	0.00E-01	6.40E 01	0.00E-01	5.25E 05
W	187	6.56E 03	5.49E 03	1.92E 03	0.00E-01	0.00E-01	0.00E-01	1.80E 06
NP	239	3.67E 00	3.61E-01	1.99E-01	0.00E-01	1.13E 00	0.00E-01	7.41E 04



ATTACHMENT A  
(Page 120 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-7  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	9.94E 02	9.94E 02	9.94E 02	9.94E 02	9.94E 02	9.94E 02
C	14	4.86E 08	9.72E 07	9.72E 07	9.72E 07	9.72E 07	9.72E 07	9.72E 07
NA	24	4.26E 06	4.26E 06	4.26E 06	4.26E 06	4.26E 06	4.26E 06	4.26E 06
P	32	3.15E 10	1.95E 09	1.22E 09	0.00E-01	0.00E-01	0.00E-01	2.65E 09
CR	51	0.00E-01	0.00E-01	4.99E 04	2.77E 04	1.09E 04	7.13E 04	8.39E 06
MN	54	0.00E-01	1.40E 07	2.78E 06	0.00E-01	4.18E 06	0.00E-01	2.87E 07
MN	56	0.00E-01	7.37E-03	1.31E-03	0.00E-01	9.33E-03	0.00E-01	4.85E-01
FE	55	4.45E 07	3.16E 07	7.36E 06	0.00E-01	0.00E-01	2.00E 07	1.37E 07
FE	59	5.18E 07	1.21E 08	4.67E 07	0.00E-01	0.00E-01	3.81E 07	2.86E 08
CO	58	0.00E-01	7.94E 06	1.83E 07	0.00E-01	0.00E-01	0.00E-01	1.09E 08
CO	60	0.00E-01	2.78E 07	6.26E 07	0.00E-01	0.00E-01	0.00E-01	3.62E 08
NI	63	1.18E 10	8.35E 08	4.01E 08	0.00E-01	0.00E-01	0.00E-01	1.33E 08
NI	65	8.48E-01	1.08E-01	4.94E-02	0.00E-01	0.00E-01	0.00E-01	5.88E 00
CU	64	0.00E-01	4.25E 04	2.00E 04	0.00E-01	1.08E 05	0.00E-01	3.30E 06
ZN	65	2.11E 09	7.31E 09	3.41E 09	0.00E-01	4.68E 09	0.00E-01	3.10E 09
ZN	69	9.62E-12	1.83E-11	1.28E-12	0.00E-01	1.20E-11	0.00E-01	3.38E-11
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	4.73E 09	2.22E 09	0.00E-01	0.00E-01	0.00E-01	7.00E 08
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	2.67E 09	0.00E-01	7.66E 07	0.00E-01	0.00E-01	0.00E-01	3.19E 08
SR	90	6.61E 10	0.00E-01	1.63E 10	0.00E-01	0.00E-01	0.00E-01	1.86E 09
SR	91	5.27E 04	0.00E-01	2.10E 03	0.00E-01	0.00E-01	0.00E-01	2.39E 05
SR	92	8.96E-01	0.00E-01	3.82E-02	0.00E-01	0.00E-01	0.00E-01	2.28E 01
Y	90	1.30E 02	0.00E-01	3.50E 00	0.00E-01	0.00E-01	0.00E-01	1.07E 06
Y	91M	1.11E-19	0.00E-01	4.22E-21	0.00E-01	0.00E-01	0.00E-01	5.22E-18
Y	91	1.58E 04	0.00E-01	4.24E 02	0.00E-01	0.00E-01	0.00E-01	6.48E 06
Y	92	1.03E-04	0.00E-01	2.99E-06	0.00E-01	0.00E-01	0.00E-01	2.83E 00
Y	93	4.30E-01	0.00E-01	1.18E-02	0.00E-01	0.00E-01	0.00E-01	1.31E 04
ZR	95	1.65E 03	5.21E 02	3.58E 02	0.00E-01	7.65E 02	0.00E-01	1.20E 06
ZR	97	7.89E-01	1.56E-01	7.19E-02	0.00E-01	2.37E-01	0.00E-01	4.23E 04
NB	95	1.41E 05	7.81E 04	4.30E 04	0.00E-01	7.57E 04	0.00E-01	3.34E 08
MO	99	0.00E-01	4.47E 07	8.53E 06	0.00E-01	1.02E 08	0.00E-01	8.01E 07
TC	99M	5.77E 00	1.61E 01	2.08E 02	0.00E-01	2.40E 02	8.93E 00	1.06E 04

ATTACHMENT A  
(Page 121 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-7 (cont'd)**  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	1.81E 03	0.00E-01	7.74E 02	0.00E-01	6.38E 03	0.00E-01	1.51E 05
RU	105	1.57E-03	0.00E-01	6.08E-04	0.00E-01	1.98E-02	0.00E-01	1.27E 00
RU	106	3.75E 04	0.00E-01	4.73E 03	0.00E-01	7.23E 04	0.00E-01	1.80E 06
AG	110M	9.63E 07	9.11E 07	5.54E 07	0.00E-01	1.74E 08	0.00E-01	2.56E 10
TE	125M	3.00E 07	1.08E 07	4.02E 06	8.39E 06	0.00E-01	0.00E-01	8.86E 07
TE	127M	8.44E 07	2.99E 07	1.00E 07	2.01E 07	3.42E 08	0.00E-01	2.10E 08
TE	127	1.21E 03	4.29E 02	2.61E 02	8.36E 02	4.91E 03	0.00E-01	9.35E 04
TE	129M	1.10E 08	4.09E 07	1.74E 07	3.55E 07	4.61E 08	0.00E-01	4.13E 08
TE	129	5.23E-10	1.95E-10	1.27E-10	3.74E-10	2.20E-09	0.00E-01	2.86E-09
TE	131M	6.57E 05	3.15E 05	2.63E 05	4.74E 05	3.29E 06	0.00E-01	2.53E 07
TE	131	6.70E-33	2.76E-33	2.09E-33	5.16E-33	2.93E-32	0.00E-01	5.50E-34
TE	132	4.29E 06	2.72E 06	2.56E 06	2.87E 06	2.61E 07	0.00E-01	8.61E 07
I	130	7.39E 05	2.14E 06	8.54E 05	1.74E 08	3.26E 06	0.00E-01	1.64E 06
I	131	5.37E 08	7.52E 08	4.04E 08	2.20E 11	1.30E 09	0.00E-01	1.49E 08
I	132	2.92E-01	7.65E-01	2.74E-01	2.58E 01	1.20E 00	0.00E-01	3.33E-01
I	133	7.07E 06	1.20E 07	3.66E 06	1.67E 09	2.10E 07	0.00E-01	9.08E 06
I	134	3.61E-12	9.58E-12	3.44E-12	1.60E-10	1.51E-11	0.00E-01	1.26E-13
I	135	2.28E 04	5.88E 04	2.18E 04	3.78E 06	9.28E 04	0.00E-01	6.51E 04
CS	134	9.82E 09	2.31E 10	1.07E 10	0.00E-01	7.34E 09	2.80E 09	2.87E 08
CS	136	4.44E 08	1.75E 09	1.17E 09	0.00E-01	9.52E 08	1.50E 08	1.41E 08
CS	137	1.34E 10	1.78E 10	6.20E 09	0.00E-01	6.06E 09	2.35E 09	2.53E 08
CS	138	1.66E-23	3.19E-23	1.60E-23	0.00E-01	2.36E-23	2.74E-24	1.45E-26
BA	139	8.44E-08	5.94E-11	2.46E-09	0.00E-01	5.60E-11	4.09E-11	7.53E-07
BA	140	4.85E 07	5.95E 04	3.13E 06	0.00E-01	2.02E 04	4.00E 04	7.48E 07
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	8.12E 00	3.99E 00	1.06E 00	0.00E-01	0.00E-01	0.00E-01	2.29E 05
LA	142	1.69E-11	7.52E-12	1.87E-12	0.00E-01	0.00E-01	0.00E-01	2.29E-07
CE	141	8.88E 03	5.93E 03	6.81E 02	0.00E-01	2.79E 03	0.00E-01	1.70E 07
CE	143	7.64E 01	5.56E 04	6.21E 00	0.00E-01	2.49E 01	0.00E-01	1.67E 06
CE	144	6.58E 05	2.72E 05	3.54E 04	0.00E-01	1.63E 05	0.00E-01	1.66E 08
PR	143	2.90E 02	1.16E 02	1.44E 01	0.00E-01	6.73E 01	0.00E-01	9.55E 05
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	1.82E 02	1.98E 02	1.19E 01	0.00E-01	1.16E 02	0.00E-01	7.15E 05
W	187	1.20E 04	9.78E 03	3.43E 03	0.00E-01	0.00E-01	0.00E-01	2.65E 06
NP	239	7.01E 00	6.61E-01	3.67E-01	0.00E-01	2.07E 00	0.00E-01	1.06E 05

ATTACHMENT A  
(Page 122 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-8**  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.57E 03	1.57E 03	1.57E 03	1.57E 03	1.57E 03	1.57E 03
C	14	1.19E 09	2.39E 08	2.39E 08	2.39E 08	2.39E 08	2.39E 08	2.39E 08
NA	24	8.86E 06	8.86E 06	8.86E 06	8.86E 06	8.86E 06	8.86E 06	8.86E 06
P	32	7.77E 10	3.64E 09	3.00E 09	0.00E-01	0.00E-01	0.00E-01	2.15E 09
CR	51	0.00E-01	0.00E-01	1.02E 05	5.65E 04	1.54E 04	1.03E 05	5.40E 06
MN	54	0.00E-01	2.10E 07	5.59E 06	0.00E-01	5.88E 06	0.00E-01	1.76E 07
MN	56	0.00E-01	1.29E-02	2.90E-03	0.00E-01	1.56E-02	0.00E-01	1.86E 00
FE	55	1.12E 08	5.93E 07	1.84E 07	0.00E-01	0.00E-01	3.35E 07	1.10E 07
FE	59	1.20E 08	1.94E 08	9.69E 07	0.00E-01	0.00E-01	5.64E 07	2.02E 08
CO	58	0.00E-01	1.21E 07	3.71E 07	0.00E-01	0.00E-01	0.00E-01	7.07E 07
CO	60	0.00E-01	4.32E 07	1.27E 08	0.00E-01	0.00E-01	0.00E-01	2.39E 08
NI	63	2.96E 10	1.59E 09	1.01E 09	0.00E-01	0.00E-01	0.00E-01	1.07E 08
NI	65	2.07E 00	1.95E-01	1.14E-01	0.00E-01	0.00E-01	0.00E-01	2.39E 01
CU	64	0.00E-01	7.47E 04	4.51E 04	0.00E-01	1.81E 05	0.00E-01	3.51E 06
ZN	65	4.13E 09	1.10E 10	6.85E 09	0.00E-01	6.94E 09	0.00E-01	1.93E 09
ZN	69	2.36E-11	3.42E-11	3.16E-12	0.00E-01	2.07E-10	0.00E-01	2.15E-09
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	8.77E 09	5.39E 09	0.00E-01	0.00E-01	0.00E-01	5.64E 08
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	6.62E 09	0.00E-01	1.89E 08	0.00E-01	0.00E-01	0.00E-01	2.56E 08
SR	90	1.12E 11	0.00E-01	2.83E 10	0.00E-01	0.00E-01	0.00E-01	1.50E 09
SR	91	1.29E 05	0.00E-01	4.88E 03	0.00E-01	0.00E-01	0.00E-01	2.85E 05
SR	92	2.19E 00	0.00E-01	8.78E-02	0.00E-01	0.00E-01	0.00E-01	4.15E 01
Y	90	3.22E 02	0.00E-01	8.61E 00	0.00E-01	0.00E-01	0.00E-01	9.15E 05
Y	91M	2.70E-19	0.00E-01	9.82E-21	0.00E-01	0.00E-01	0.00E-01	5.29E-16
Y	91	3.90E 04	0.00E-01	1.04E 03	0.00E-01	0.00E-01	0.00E-01	5.20E 06
Y	92	2.54E-04	0.00E-01	7.26E-06	0.00E-01	0.00E-01	0.00E-01	7.33E 00
Y	93	1.06E 00	0.00E-01	2.90E-02	0.00E-01	0.00E-01	0.00E-01	1.57E 04
ZR	95	3.83E 03	8.43E 02	7.50E 02	0.00E-01	1.21E 03	0.00E-01	8.79E 05
ZR	97	1.92E 00	2.77E-01	1.64E-01	0.00E-01	3.98E-01	0.00E-01	4.20E 04
NB	95	3.18E 05	1.24E 05	8.85E 04	0.00E-01	1.16E 05	0.00E-01	2.29E 08
MO	99	0.00E-01	8.14E 07	2.01E 07	0.00E-01	1.74E 08	0.00E-01	6.73E 07
TC	99M	1.32E 01	2.59E 01	4.30E 02	0.00E-01	3.77E 02	1.32E 01	1.48E 04

ATTACHMENT A  
(Page 123 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-8 (cont'd)  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	4.28E 03	0.00E-01	1.65E 03	0.00E-01	1.08E 04	0.00E-01	1.11E 05
RU	105	3.83E-03	0.00E-01	1.39E-03	0.00E-01	3.36E-02	0.00E-01	2.50E 00
RU	106	9.24E 04	0.00E-01	1.15E 04	0.00E-01	1.25E 05	0.00E-01	1.44E 06
AG	110M	2.09E 08	1.41E 08	1.13E 08	0.00E-01	2.63E 08	0.00E-01	1.68E 10
TE	125M	7.38E 07	2.00E 07	9.84E 06	2.07E 07	0.00E-01	0.00E-01	7.12E 07
TE	127M	2.08E 08	5.60E 07	2.47E 07	4.97E 07	5.93E 08	0.00E-01	1.68E 08
TE	127	2.98E 03	8.03E 02	6.39E 02	2.06E 03	8.47E 03	0.00E-01	1.16E 05
TE	129M	2.71E 08	7.58E 07	4.21E 07	8.75E 07	7.97E 08	0.00E-01	3.31E 08
TE	129	1.29E-09	3.60E-10	3.06E-10	9.21E-10	3.78E-09	0.00E-01	8.03E-08
TE	131M	1.60E 06	5.53E 05	5.89E 05	1.14E 06	5.36E 06	0.00E-01	2.24E 07
TE	131	1.64E-32	5.01E-33	4.89E-33	1.26E-32	4.97E-32	0.00E-01	8.64E-32
TE	132	1.02E 07	4.54E 06	5.48E 06	6.61E 06	4.21E 07	0.00E-01	4.57E 07
I	130	1.73E 06	3.49E 06	1.80E 06	3.85E 08	5.22E 06	0.00E-01	1.63E 06
I	131	1.30E 09	1.31E 09	7.45E 08	4.33E 11	2.15E 09	0.00E-01	1.17E 08
I	132	6.91E-01	1.27E 00	5.84E-01	5.89E 01	1.94E 00	0.00E-01	1.49E 00
I	133	1.72E 07	2.12E 07	8.04E 06	3.95E 09	3.54E 07	0.00E-01	8.56E 06
I	134	8.55E-12	1.59E-11	7.31E-12	3.65E-10	2.43E-11	0.00E-01	1.05E-11
I	135	5.41E 04	9.73E 04	4.60E 04	8.62E 06	1.49E 05	0.00E-01	7.41E 04
CS	134	2.27E 10	3.72E 10	7.84E 09	0.00E-01	1.15E 10	4.13E 09	2.00E 08
CS	136	1.00E 09	2.76E 09	1.78E 09	0.00E-01	1.47E 09	2.19E 08	9.69E 07
CS	137	3.22E 10	3.09E 10	4.55E 09	0.00E-01	1.01E 10	3.62E 09	1.93E 08
CS	138	4.03E-23	5.60E-23	3.55E-23	0.00E-01	3.94E-23	4.24E-24	2.58E-23
BA	139	2.07E-07	1.11E-10	6.01E-09	0.00E-01	9.67E-11	6.51E-11	1.20E-05
BA	140	1.17E 08	1.03E 05	6.84E 06	0.00E-01	3.34E 04	6.12E 04	5.94E 07
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	1.94E 01	6.80E 00	2.29E 00	0.00E-01	0.00E-01	0.00E-01	1.89E 05
LA	142	4.09E-11	1.30E-11	4.08E-12	0.00E-01	0.00E-01	0.00E-01	2.58E-06
CE	141	2.19E 04	1.09E 04	1.62E 03	0.00E-01	4.78E 03	0.00E-01	1.36E 07
CE	143	1.88E 02	1.02E 05	1.47E 01	0.00E-01	4.27E 01	0.00E-01	1.49E 06
CE	144	1.62E 06	5.09E 05	8.66E 04	0.00E-01	2.82E 05	0.00E-01	1.33E 08
PR	143	7.18E 02	2.16E 02	3.56E 01	0.00E-01	1.17E 02	0.00E-01	7.75E 05
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	4.47E 02	3.62E 02	2.80E 01	0.00E-01	1.99E 02	0.00E-01	5.73E 05
W	187	2.91E 04	1.72E 04	7.73E 03	0.00E-01	0.00E-01	0.00E-01	2.42E 06
NP	239	1.72E 01	1.24E 00	8.70E-01	0.00E-01	3.58E 00	0.00E-01	9.16E 04

ATTACHMENT A  
(Page 124 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-9  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
INFANT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-ILLI
H	3	0.00E-01	2.38E 03	2.38E 03	2.38E 03	2.38E 03	2.38E 03	2.38E 03
C	14	2.34E-09	5.00E 08	5.00E 08	5.00E 08	5.00E 08	5.00E 08	5.00E 08
NA	24	1.54E 07	1.54E 07	1.54E 07	1.54E 07	1.54E 07	1.54E 07	1.54E 07
P	32	1.60E 11	9.42E 09	6.21E 09	0.00E-01	0.00E-01	0.00E-01	2.17E 09
CR	51	0.00E-01	0.00E-01	1.61E 05	1.05E 05	2.30E 04	2.05E 05	4.70E 06
MN	54	0.00E-01	3.90E 07	8.84E 06	0.00E-01	8.64E 06	0.00E-01	1.43E 07
MN	56	0.00E-01	3.15E-02	5.43E-03	0.00E-01	2.71E-02	0.00E-01	2.86E 00
FE	55	1.35E 08	8.72E 07	2.33E 07	0.00E-01	0.00E-01	4.26E 07	1.11E 07
FE	59	2.24E 08	3.92E 08	1.54E 08	0.00E-01	0.00E-01	1.16E 08	1.87E 08
CO	58	0.00E-01	2.43E 07	6.05E 07	0.00E-01	0.00E-01	0.00E-01	6.04E 07
CO	60	0.00E-01	8.82E 07	2.08E 08	0.00E-01	0.00E-01	0.00E-01	2.10E 08
NI	63	3.49E 10	2.16E 09	1.21E 09	0.00E-01	0.00E-01	0.00E-01	1.07E 08
NI	65	4.39E 00	4.97E-01	2.26E-01	0.00E-01	0.00E-01	0.00E-01	3.78E 01
CU	64	0.00E-01	1.86E 05	8.60E 04	0.00E-01	3.14E 05	0.00E-01	3.81E 06
ZN	65	5.55E 09	1.90E 10	8.78E 09	0.00E-01	9.23E 09	0.00E-01	1.61E 10
ZN	69	5.04E-11	9.07E-11	6.75E-12	0.00E-01	3.77E-11	0.00E-01	7.40E-09
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	2.23E 10	1.10E 10	0.00E-01	0.00E-01	0.00E-01	5.70E 08
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	1.26E 10	0.00E-01	3.61E 08	0.00E-01	0.00E-01	0.00E-01	2.59E 08
SR	90	1.22E 11	0.00E-01	3.10E 10	0.00E-01	0.00E-01	0.00E-01	1.52E 09
SR	91	2.69E 05	0.00E-01	9.75E 02	0.00E-01	0.00E-01	0.00E-01	3.19E 05
SR	92	4.66E 00	0.00E-01	1.73E-01	0.00E-01	0.00E-01	0.00E-01	5.02E 01
Y	90	6.80E 02	0.00E-01	1.82E 01	0.00E-01	0.00E-01	0.00E-01	9.39E 05
Y	91M	5.72E-19	0.00E-01	1.95E-20	0.00E-01	0.00E-01	0.00E-01	1.91E-15
Y	91	7.33E 04	0.00E-01	1.95E 03	0.00E-01	0.00E-01	0.00E-01	5.25E 06
Y	92	5.39E-04	0.00E-01	1.51E-05	0.00E-01	0.00E-01	0.00E-01	1.03E 01
Y	93	2.25E 00	0.00E-01	6.13E-02	0.00E-01	0.00E-01	0.00E-01	1.78E 04
ZR	95	6.81E 03	1.66E 03	1.18E 03	0.00E-01	1.79E 03	0.00E-01	8.26E 05
ZR	97	4.06E 00	6.98E-01	3.19E-01	0.00E-01	7.03E-01	0.00E-01	4.45E 04
NB	95	5.94E 05	2.45E 05	1.41E 05	0.00E-01	1.75E 05	0.00E-01	2.06E 08
MO	99	0.00E-01	2.08E 08	4.06E 07	0.00E-01	3.11E 08	0.00E-01	6.85E 07
TC	99M	2.75E -01	5.68E 01	7.31E 02	0.00E-01	6.11E 02	2.97E 01	1.65E 04

ATTACHMENT A  
(Page 125 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-9 (cont'd)**  
GRASS-COW-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
INFANT (RI FACTORS)

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC 101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU 103	8.67E 03	0.00E-01	2.90E 03	0.00E-01	1.80E 04	0.00E-01	1.05E 05
RU 105	8.07E-03	0.00E-01	2.72E-02	0.00E-01	5.93E-01	0.00E-01	3.21E 00
RU 106	1.90E 05	0.00E-01	2.38E 04	0.00E-01	2.25E 05	0.00E-01	1.44E 06
AG 110M	3.86E 08	2.82E 08	1.86E 08	0.00E-01	4.03E 08	0.00E-01	1.46E 10
TE 125M	1.51E 08	5.04E 07	2.04E 07	5.07E 07	0.00E-01	0.00E-01	7.18E 07
TE 127M	4.21E 08	1.40E 08	5.10E 07	1.22E 08	1.04E 09	0.00E-01	1.70E 08
TE 127	6.32E 03	2.12E 03	1.36E 03	5.15E 03	1.54E 04	0.00E-01	1.33E 05
TE 129M	5.57E 08	1.91E 08	8.58E 07	2.14E 08	1.39E 09	0.00E-01	3.33E 08
TE 129	2.74E-09	9.43E-10	6.39E-09	2.29E-08	6.81E-08	0.00E-01	2.19E-07
TE 131M	3.38E 06	1.36E 06	1.12E 06	2.76E 06	9.36E 06	0.00E-01	2.29E 07
TE 131	3.49E-32	1.29E-32	9.78E-32	3.11E-31	8.91E-31	0.00E-01	1.41E-30
TE 132	2.11E 07	1.05E 07	9.75E 06	1.54E 07	6.53E 07	0.00E-01	3.87E 07
I 130	3.55E 06	7.81E 06	3.14E 06	8.76E 08	8.58E 06	0.00E-01	1.68E 06
I 131	2.72E 09	3.21E 09	1.41E 09	1.05E 12	3.74E 09	0.00E-01	1.14E 08
I 132	1.43E 00	2.91E 00	1.04E 00	1.37E 02	3.25E 00	0.00E-01	2.36E 00
I 133	3.63E 07	5.28E 07	1.55E 07	9.61E 09	6.21E 07	0.00E-01	8.94E 06
I 134	1.77E-11	3.63E-11	1.29E-10	8.47E-09	4.06E-10	0.00E-01	3.76E-11
I 135	1.12E 05	2.24E 05	8.15E 04	2.00E 07	2.49E 05	0.00E-01	8.09E 04
CS 134	3.65E 10	6.80E 10	6.87E 09	0.00E-01	1.75E 10	6.21E 09	1.85E 08
CS 136	1.96E 09	5.76E 09	2.15E 09	0.00E-01	2.30E 09	4.70E 08	8.75E 07
CS 137	5.15E 10	6.02E 10	4.27E 09	0.00E-01	1.62E 10	6.55E 09	1.88E 08
CS 138	8.50E-23	1.38E-22	6.70E-22	0.00E-01	6.89E-22	1.08E-23	2.21E-22
BA 139	4.41E-07	2.93E-10	1.28E-07	0.00E-01	1.76E-09	1.77E-10	2.80E-05
BA 140	2.41E 08	2.41E 08	1.24E 07	0.00E-01	5.72E 04	1.48E 05	5.92E 07
BA 141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA 142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA 140	4.06E 01	1.60E 01	4.12E 00	0.00E-01	0.00E-01	0.00E-01	1.88E 05
LA 142	8.59E-11	3.15E-11	7.55E-11	0.00E-01	0.00E-01	0.00E-01	5.36E-06
CE 141	4.34E 04	2.64E 04	3.11E 03	0.00E-01	8.16E 03	0.00E-01	1.37E 07
CE 143	3.97E 02	2.63E 05	3.00E 01	0.00E-01	7.67E 01	0.00E-01	1.54E 06
CE 144	2.33E 06	9.52E 05	1.30E 05	0.00E-01	3.85E 05	0.00E-01	1.33E 08
PR 143	1.49E 03	5.56E 02	7.36E 01	0.00E-01	2.07E 02	0.00E-01	7.84E 05
PR 144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND 147	8.86E 02	9.10E 02	5.57E 01	0.00E-01	3.51E 02	0.00E-01	5.77E 05
W. 187	6.12E 04	4.26E 04	1.47E 04	0.00E-01	0.00E-01	0.00E-01	2.50E 06
NP 239	3.65E 01	3.26E 00	1.84E 00	0.00E-01	1.50E 00	0.00E-01	9.43E 04



ATTACHMENT A  
(Page 127 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-10 (cont'd)  
GRASS-COW-MEAT PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT (RI FACTORS)

NUCLIDE	BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
RU 103	1.05E 08	0.00E-01	4.53E 07	0.00E-01	4.01E 08	0.00E-01	1.23E 10
RU 105	5.87E-28	0.00E-01	2.32E-28	0.00E-01	7.58E-27	0.00E-01	3.59E-25
RU 106	2.80E 09	0.00E-01	3.54E 08	0.00E-01	5.40E 09	0.00E-01	1.81E 11
AG 110M	6.68E 06	6.18E 06	3.67E 06	0.00E-01	1.22E 07	0.00E-01	2.52E 09
TE 125M	3.59E 08	1.30E 08	4.81E 07	1.08E 08	1.46E 09	0.00E-01	1.43E 09
TE 127M	1.12E 09	3.99E 08	1.36E 08	2.85E 08	4.53E 09	0.00E-01	3.74E 09
TE 127	2.14E-10	7.68E-11	4.63E-11	1.58E-10	8.71E-10	0.00E-01	1.69E-08
TE 129M	1.13E 09	4.23E 08	1.80E 08	3.90E 08	4.73E 09	0.00E-01	5.71E 09
TE 129	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
TE 131M	4.52E 02	2.21E 02	1.84E 02	3.50E 02	2.24E 03	0.00E-01	2.20E 04
TE 131	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
TE 132	1.42E 06	9.19E 05	8.63E 05	1.01E 06	8.85E 06	0.00E-01	4.35E 07
I 130	2.12E-06	6.26E-06	2.47E-06	5.30E-04	9.76E-06	0.00E-01	5.39E-06
I 131	1.07E 07	1.54E 07	8.81E 06	5.04E 09	2.64E 07	0.00E-01	4.06E 06
I 132	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
I 133	3.67E-01	6.38E-01	1.94E-01	9.37E 01	1.11E 00	0.00E-01	5.73E-01
I 134	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
I 135	4.47E-17	1.17E-16	4.32E-17	7.73E-15	1.88E-16	0.00E-01	1.32E-16
CS 134	6.58E 08	1.56E 09	1.28E 09	0.00E-01	5.06E 08	1.68E 08	2.74E 07
CS 136	1.18E 07	4.66E 07	3.35E 07	0.00E-01	2.59E 07	3.55E 06	5.24E 06
CS 137	8.72E 08	1.19E 09	7.81E 08	0.00E-01	4.05E 08	1.35E 08	2.31E 07
CS 138	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA 139	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA 140	2.87E 07	3.61E 04	1.88E 06	0.00E-01	1.23E 04	2.07E 04	5.92E 07
BA 141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA 142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA 140	3.76E-02	1.89E-02	5.00E-03	0.00E-01	0.00E-01	0.00E-01	1.39E 03
LA 142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
CE 141	1.40E 04	9.50E 03	1.08E 03	0.00E-01	4.41E 03	0.00E-01	3.63E 07
CE 143	2.01E-02	1.49E 01	1.65E-03	0.00E-01	6.55E-03	0.00E-01	5.56E 02
CE 144	1.46E 06	6.09E 05	9.83E 04	0.00E-01	3.61E 05	0.00E-01	4.93E 08
PR 143	2.10E 04	8.41E 03	1.04E 03	0.00E-01	4.86E 03	0.00E-01	9.19E 07
PR 144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND 147	7.17E 03	8.29E 03	4.96E 02	0.00E-01	4.84E 03	0.00E-01	3.98E 07
W 187	2.17E-02	1.81E-02	6.33E-03	0.00E-01	0.00E-01	0.00E-01	5.93E 00
NP 239	2.59E-01	2.55E-02	1.40E-02	0.00E-01	7.94E-02	0.00E-01	5.22E 03



ATTACHMENT A  
(Page 128 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-11**  
GRASS-COW-MEAT PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.94E 02	1.94E 02	1.94E 02	1.94E 02	1.94E 02	1.94E 02
C	14	2.04E 08	4.08E 07	4.08E 07	4.08E 07	4.08E 07	4.08E 07	4.08E 07
NA	24	1.09E-03	1.09E-03	1.09E-03	1.09E-03	1.09E-03	1.09E-03	1.09E-03
P	32	3.93E 09	2.44E 08	1.52E 08	0.00E-01	0.00E-01	0.00E-01	3.30E 08
CR	51	0.00E-01	0.00E-01	5.64E 03	3.13E 03	1.24E 03	8.05E 03	9.47E 05
MN	54	0.00E-01	7.00E 06	1.39E 06	0.00E-01	2.09E 06	0.00E-01	1.44E 07
MN	56	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
FE	55	2.38E 08	1.69E 08	3.93E 07	0.00E-01	0.00E-01	1.07E 08	7.30E 07
FE	59	2.12E 08	4.95E 08	1.01E 08	0.00E-01	0.00E-01	1.56E 08	1.17E 09
CO	58	0.00E-01	1.41E 07	3.24E 07	0.00E-01	0.00E-01	0.00E-01	1.94E 08
CO	60	0.00E-01	5.83E 07	1.31E 08	0.00E-01	0.00E-01	0.00E-01	7.60E 08
NI	63	1.52E 10	1.07E 09	5.15E 08	0.00E-01	0.00E-01	0.00E-01	1.71E 08
NI	65	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
CU	64	0.00E-01	2.23E-07	1.05E-07	0.00E-01	5.64E-07	0.00E-01	1.73E-05
ZN	65	2.50E 08	8.69E 08	4.05E 08	0.00E-01	5.56E 08	0.00E-01	3.68E 08
ZN	69	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	4.07E 08	1.91E 08	0.00E-01	0.00E-01	0.00E-01	6.02E 07
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	2.55E 08	0.00E-01	7.29E 06	0.00E-01	0.00E-01	0.00E-01	3.03E 07
SR	90	8.05E 09	0.00E-01	1.99E 09	0.00E-01	0.00E-01	0.00E-01	2.26E 08
SR	91	1.19E-10	0.00E-01	4.75E-12	0.00E-01	0.00E-01	0.00E-01	5.41E-10
SR	92	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Y	90	8.98E 01	0.00E-01	2.42E 00	0.00E-01	0.00E-01	0.00E-01	7.41E 05
Y	91M	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Y	91	9.54E 05	0.00E-01	2.56E 04	0.00E-01	0.00E-01	0.00E-01	3.91E 08
Y	92	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Y	93	5.56E-12	0.00E-01	1.53E-13	0.00E-01	0.00E-01	0.00E-01	1.70E-07
ZR	95	1.50E 06	4.73E 05	3.26E 05	0.00E-01	6.96E 05	0.00E-01	1.09E 09
ZR	97	1.73E-05	3.42E-06	1.58E-06	0.00E-01	5.19E-06	0.00E-01	9.27E-01
NB	95	1.80E 06	9.96E 05	5.48E 05	0.00E-01	9.66E 05	0.00E-01	4.26E 09
MO	99	0.00E-01	8.26E 04	1.58E 04	0.00E-01	1.89E 05	0.00E-01	1.48E 05
TC	99M	3.58E-21	9.97E-21	1.29E-19	0.00E-01	1.49E-19	5.54E-21	6.55E-18

ATTACHMENT A  
(Page 129 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-11 (cont'd)  
GRASS-COW-MEAT PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	8.56E 07	0.00E-01	3.66E 07	0.00E-01	3.02E 08	0.00E-01	7.15E 09
RU	105	4.91E-28	0.00E-01	1.91E-28	0.00E-01	6.91E-27	0.00E-01	3.96E-25
RU	106	2.36E 09	0.00E-01	2.97E 08	0.00E-01	4.55E 09	0.00E-01	1.13E 11
AG	110M	5.06E 06	4.79E 06	2.91E 06	0.00E-01	9.13E 06	0.00E-01	1.35E 09
TE	125M	3.03E 08	1.09E 08	4.05E 07	8.47E 07	0.00E-01	0.00E-01	8.94E 08
TE	127M	9.42E 08	3.34E 08	1.12E 08	2.24E 08	3.82E 09	0.00E-01	2.35E 09
TE	127	1.81E-10	6.43E-11	3.91E-11	1.25E-09	7.35E-10	0.00E-01	1.40E-08
TE	129M	9.50E 08	3.53E 08	1.50E 08	3.07E 08	3.97E 09	0.00E-01	3.57E 09
TE	129	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
TE	131M	3.77E 02	1.81E 02	1.51E 02	2.72E 02	1.88E 03	0.00E-01	1.45E 04
TE	131	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
TE	132	1.16E 06	7.36E 05	6.93E 05	7.76E 05	7.06E 06	0.00E-01	2.33E 07
I	130	1.71E-06	4.94E-06	1.97E-06	4.03E-04	7.61E-06	0.00E-01	3.80E-06
I	131	8.93E 06	1.25E 07	6.72E 06	3.65E 09	2.15E 07	0.00E-01	2.47E 06
I	132	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
I	133	3.07E-01	5.20E-01	1.59E-01	7.26E 01	9.12E-01	0.00E-01	3.93E-01
I	134	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
I	135	3.64E-17	9.37E-17	3.47E-17	6.03E-15	1.48E-16	0.00E-01	1.04E-16
CS	134	5.23E 08	1.23E 09	5.71E 08	0.00E-01	3.91E 08	1.49E 08	1.53E 07
CS	136	9.20E 06	3.62E 07	2.43E 07	0.00E-01	1.97E 07	3.11E 06	2.91E 06
CS	137	7.24E 08	9.63E 08	3.36E 08	0.00E-01	3.28E 08	1.27E 08	1.37E 07
CS	138	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	139	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	140	2.38E 07	2.91E 04	1.53E 06	0.00E-01	9.88E 03	1.96E 04	3.67E 07
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	3.09E-02	1.52E-02	4.04E-03	0.00E-01	0.00E-01	0.00E-01	8.72E 02
LA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
CE	141	1.18E 04	7.88E 03	9.05E 02	0.00E-01	3.71E 03	0.00E-01	2.25E 07
CE	143	1.69E-02	1.23E 01	1.38E-03	0.00E-01	5.53E-03	0.00E-01	3.70E 02
CE	144	1.23E 06	5.08E 05	6.60E 04	0.00E-01	3.04E 05	0.00E-01	3.09E 08
PR	143	1.77E 04	7.05E 03	8.78E 02	0.00E-01	4.10E 03	0.00E-01	5.81E 07
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	6.32E 03	6.87E 03	4.11E 02	0.00E-01	4.03E 03	0.00E-01	2.48E 07
W	187	1.81E-02	1.48E-02	5.18E-03	0.00E-01	0.00E-01	0.00E-01	4.00E 00
NP	239	2.26E-01	2.13E-02	1.19E-02	0.00E-01	6.70E-07	0.00E-01	3.43E 03

ATTACHMENT A  
(Page 130 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-12  
GRASS-COW-MEAT PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	2.34E 02	2.34E 02	2.34E 02	2.34E 02	2.34E 02	2.34E 02
C	14	3.83E 08	7.67E 07	7.67E 07	7.67E 07	7.67E 07	7.67E 07	7.67E 07
NA	24	1.73E-03	1.73E-03	1.73E-03	1.73E-03	1.73E-03	1.73E-03	1.73E-03
P	32	7.41E 09	3.47E 08	2.86E 08	0.00E-01	0.00E-01	0.00E-01	2.05E 08
CR	51	0.00E-01	0.00E-01	8.79E 03	4.88E 03	1.33E 03	8.91E 03	4.66E 05
MN	54	0.00E-01	8.01E 06	2.13E 06	0.00E-01	2.25E 06	0.00E-01	6.72E 06
MN	56	0.00E-01	1.63E-53	3.67E-54	0.00E-01	1.97E-53	0.00E-01	2.36E-51
FE	55	4.57E 08	2.42E 08	7.50E 07	0.00E-01	0.00E-01	1.37E 08	4.49E 07
FE	59	3.76E 08	6.09E 08	3.03E 08	0.00E-01	0.00E-01	1.76E 08	6.34E 08
CO	58	0.00E-01	1.64E 07	5.03E 07	0.00E-01	0.00E-01	0.00E-01	9.58E 07
CO	60	0.00E-01	6.93E 07	2.04E 08	0.00E-01	0.00E-01	0.00E-01	3.84E 08
NI	63	2.91E 10	1.56E 09	9.91E 08	0.00E-01	0.00E-01	0.00E-01	1.05E 08
NI	65	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
CU	64	0.00E-01	3.00E-07	1.81E-07	0.00E-01	7.24E-07	0.00E-01	1.41E-05
ZN	65	3.75E 08	1.00E 09	6.22E 08	0.00E-01	6.30E 08	0.00E-01	1.76E 08
ZN	69	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	5.77E 08	3.55E 08	0.00E-01	0.00E-01	0.00E-01	3.71E 07
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	4.82E 08	0.00E-01	1.38E 07	0.00E-01	0.00E-01	0.00E-01	1.87E 07
SR	90	1.04E 10	0.00E-01	2.64E 09	0.00E-01	0.00E-01	0.00E-01	1.40E 08
SR	91	2.24E-10	0.00E-01	8.45E-12	0.00E-01	0.00E-01	0.00E-01	4.94E-10
SR	92	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Y	90	1.70E 02	0.00E-01	4.55E 00	0.00E-01	0.00E-01	0.00E-01	4.84E 05
Y	91M	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Y	91	1.80E 06	0.00E-01	4.82E 04	0.00E-01	0.00E-01	0.00E-01	2.40E 08
Y	92	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Y	93	1.04E-11	0.00E-01	2.87E-13	0.00E-01	0.00E-01	0.00E-01	1.56E-07
ZR	95	2.66E 06	5.86E 05	5.21E 05	0.00E-01	8.38E 05	0.00E-01	6.11E 08
ZR	97	3.22E-05	4.65E-06	2.74E-06	0.00E-01	6.68E-06	0.00E-01	7.05E-01
NB	95	3.10E 06	1.21E 06	8.63E 05	0.00E-01	1.13E 06	0.00E-01	2.23E 09
MO	99	0.00E-01	1.15E 05	2.84E 04	0.00E-01	2.45E 05	0.00E-01	9.51E 04
TC	99M	6.27E-21	1.23E-20	2.04E-19	0.00E-01	1.79E-19	6.24E-21	7.00E-18

ATTACHMENT A  
(Page 131 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-12 (cont'd)  
GRASS-COW-MEAT PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	1.55E 08	0.00E-01	5.95E 07	0.00E-01	3.90E 08	0.00E-01	4.00E 09
RU	105	9.16E-28	0.00E-01	3.32E-28	0.00E-01	8.05E-27	0.00E-01	5.98E-25
RU	106	4.44E 09	0.00E-01	5.54E 08	0.00E-01	5.99E 09	0.00E-01	6.90E 10
AG	110M	8.34E 06	5.67E 06	4.53E 06	0.00E-01	1.06E 07	0.00E-01	6.74E 08
TE	125M	5.69E 08	1.54E 08	7.59E 07	1.60E 08	0.00E-01	0.00E-01	5.49E 08
TE	127M	1.77E 09	4.78E 08	2.11E 08	4.24E 08	5.06E 09	0.00E-01	1.44E 09
TE	127	3.41E-10	9.20E-11	7.32E-11	2.36E-10	9.71E-10	0.00E-01	1.33E-08
TE	129M	1.79E 09	5.00E 08	2.78E 08	5.77E 08	5.26E 09	0.00E-01	2.18E 09
TE	129	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
TE	131M	7.01E 02	2.43E 02	2.58E 02	4.99E 02	2.35E 03	0.00E-01	9.84E 03
TE	131	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
TE	132	2.12E 06	9.39E 05	1.13E 06	1.37E 06	8.72E 06	0.00E-01	9.46E 06
I	130	3.05E-06	6.17E-06	3.18E-06	6.80E-04	9.22E-06	0.00E-01	2.89E-06
I	131	1.66E 07	1.67E 07	9.47E 06	5.51E 09	2.74E 07	0.00E-01	1.48E 06
I	132	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
I	133	5.70E-01	7.04E-01	2.66E-01	1.31E 02	1.17E 00	0.00E-01	2.84E-01
I	134	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
I	135	6.59E-17	1.19E-16	5.61E-17	1.05E-14	1.82E-16	0.00E-01	9.04E-17
CS	134	9.22E 08	1.51E 09	3.19E 08	0.00E-01	4.69E 08	1.68E 08	8.16E 06
CS	136	1.59E 07	4.36E 07	2.82E 07	0.00E-01	2.32E 07	3.46E 06	1.53E 06
CS	137	1.33E 09	1.28E 09	1.88E 08	0.00E-01	4.16E 08	1.50E 08	7.99E 06
CS	138	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	139	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	140	4.39E 07	3.84E 04	2.56E 06	0.00E-01	1.25E 04	2.29E 04	2.22E 07
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	5.66E-02	1.98E-02	6.66E-03	0.00E-01	0.00E-01	0.00E-01	5.51E 02
LA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
CE	141	2.22E 04	1.11E 04	1.64E 03	0.00E-01	4.86E 03	0.00E-01	1.38E 07
CE	143	3.18E-02	1.72E 01	2.50E-03	0.00E-01	7.23E-03	0.00E-01	2.52E 02
CE	144	2.32E 06	7.26E 05	1.24E 05	0.00E-01	4.02E 05	0.00E-01	1.89E 08
PR	143	3.34E 04	1.00E 04	1.66E 03	0.00E-01	5.43E 03	0.00E-01	3.60E 07
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	1.19E 04	9.60E 03	7.43E 02	0.00E-01	5.27E 03	0.00E-01	1.52E 07
W	187	3.36E-02	1.99E-02	8.94E-03	0.00E-01	0.00E-01	0.00E-01	2.80E 00
NP	239	4.26E-01	3.06E-02	2.15E-02	0.00E-01	8.84E-02	0.00E-01	2.26E 03

ATTACHMENT A  
(Page 132 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-13  
VEGETATION PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	2.26E 03	2.26E 03	2.26E 03	2.26E 03	2.26E 03	2.26E 03
C	14	2.38E 08	4.55E 07	4.55E 07	4.55E 07	4.55E 07	4.55E 07	4.55E 07
NA	24	2.69E 05	2.69E 05	2.69E 05	2.69E 05	2.69E 05	2.69E 05	2.69E 05
P	32	1.40E 09	8.73E 07	5.42E 07	0.00E-01	0.00E-01	0.00E-01	1.58E 08
CR	51	0.00E-01	0.00E-01	4.64E 04	2.78E 04	1.02E 04	6.16E 04	1.17E 07
MN	54	0.00E-01	3.13E 08	5.97E 07	0.00E-01	9.31E 07	0.00E-01	9.58E 08
MN	56	0.00E-01	1.59E 01	2.82E 00	0.00E-01	2.02E 01	0.00E-01	5.08E 02
FE	55	2.09E 08	1.45E 08	3.37E 07	0.00E-01	0.00E-01	8.06E 07	8.29E 07
FE	59	1.26E 08	2.96E 08	1.14E 08	0.00E-01	0.00E-01	8.28E 07	9.83E 08
CO	58	0.00E-01	3.07E 07	6.89E 07	0.00E-01	0.00E-01	0.00E-01	6.23E 08
CO	60	0.00E-01	1.67E 08	3.69E 08	0.00E-01	0.00E-01	0.00E-01	3.14E 09
NI	63	1.04E 10	7.28E 08	3.49E 08	0.00E-01	0.00E-01	0.00E-01	1.50E 08
NI	65	6.93E 01	9.01E 00	4.11E 00	0.00E-01	0.00E-01	0.00E-01	2.28E 02
CU	64	0.00E-01	9.21E 03	4.32E 03	0.00E-01	2.32E 04	0.00E-01	7.85E 05
ZN	65	3.17E 08	1.01E 09	4.56E 08	0.00E-01	6.75E 08	0.00E-01	6.36E 08
ZN	69	8.77E-06	1.68E-05	1.17E-06	0.00E-01	1.09E-05	0.00E-01	2.52E-06
BR	83	0.00E-01	0.00E-01	3.11E 00	0.00E-01	0.00E-01	0.00E-01	4.48E 00
BR	84	0.00E-01	0.00E-01	2.49E-11	0.00E-01	0.00E-01	0.00E-01	1.96E-16
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	2.19E 08	1.02E 08	0.00E-01	0.00E-01	0.00E-01	4.33E 07
RB	88	0.00E-01	3.47E-22	1.84E-22	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	1.41E-26	9.88E-27	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	9.97E 09	0.00E-01	2.86E 08	0.00E-01	0.00E-01	0.00E-01	1.60E 09
SR	90	6.05E 11	0.00E-01	1.48E 11	0.00E-01	0.00E-01	0.00E-01	1.75E 10
SR	91	3.03E 05	0.00E-01	1.22E 04	0.00E-01	0.00E-01	0.00E-01	1.44E 06
SR	92	4.27E 02	0.00E-01	1.85E 01	0.00E-01	0.00E-01	0.00E-01	8.46E 03
Y	90	1.33E 04	0.00E-01	3.56E 02	0.00E-01	0.00E-01	0.00E-01	1.41E 08
Y	91M	5.24E-09	0.00E-01	2.03E-10	0.00E-01	0.00E-01	0.00E-01	1.54E-08
Y	91	5.11E 06	0.00E-01	1.37E 05	0.00E-01	0.00E-01	0.00E-01	2.81E 09
Y	92	9.16E-01	0.00E-01	2.68E-02	0.00E-01	0.00E-01	0.00E-01	1.60E 04
Y	93	1.74E 02	0.00E-01	4.81E 00	0.00E-01	0.00E-01	0.00E-01	5.52E 06
ZR	95	1.18E 06	3.77E 05	2.55E 05	0.00E-01	5.92E 05	0.00E-01	1.20E 09
ZR	97	3.37E 02	6.81E 01	3.11E 01	0.00E-01	1.03E 02	0.00E-01	2.11E 07
NB	95	1.43E 05	7.93E 04	4.26E 04	0.00E-01	7.84E 04	0.00E-01	4.81E 08
MO	99	0.00E-01	6.15E 06	1.17E 06	0.00E-01	1.39E 07	0.00E-01	1.43E 07
TC	99M	3.10E 00	8.77E 00	1.12E 02	0.00E-01	1.33E 02	4.30E 00	5.19E 03

ATTACHMENT A  
(Page 133 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-13 (cont'd)**  
VEGETATION PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	8.34E-31	1.20E-30	1.18E-29	0.00E-01	2.16E-29	6.14E-31	0.00E-01
RU	103	4.76E 06	0.00E-01	2.05E 06	0.00E-01	1.82E 07	0.00E-01	5.56E 08
RU	105	5.39E 01	0.00E-01	2.13E 01	0.00E-01	6.97E 02	0.00E-01	3.30E 04
RU	106	1.93E 08	0.00E-01	2.44E 07	0.00E-01	3.72E 08	0.00E-01	1.25E 10
AG	110M	1.05E 07	9.75E 06	5.79E 06	0.00E-01	1.92E 07	0.00E-01	3.98E 09
TE	125M	9.66E 07	3.50E 07	1.29E 07	2.90E 07	3.93E 08	0.00E-01	3.86E 08
TE	127M	3.49E 08	1.25E 08	4.26E 07	8.93E 07	1.42E 09	0.00E-01	1.17E 09
TE	127	5.66E 03	2.03E 03	1.23E 03	4.20E 03	2.31E 04	0.00E-01	4.47E 05
TE	129M	2.51E 08	9.38E 07	3.98E 07	8.63E 07	1.05E 09	0.00E-01	1.27E 09
TE	129	7.65E-04	2.87E-04	1.86E-04	5.87E-04	3.22E-03	0.00E-01	5.77E-04
TE	131M	9.12E 05	4.46E 05	3.72E 05	7.07E 05	4.52E 06	0.00E-01	4.43E 07
TE	131	1.51E-15	6.32E-16	4.78E-16	1.24E-15	6.63E-15	0.00E-01	2.14E-16
TE	132	4.30E 06	2.78E 06	2.61E 06	3.07E 06	2.68E 07	0.00E-01	1.32E 08
I	130	3.95E 05	1.16E 06	4.57E 05	9.81E 07	1.81E 06	0.00E-01	9.97E 05
I	131	8.08E 07	1.16E 08	6.62E 07	3.79E 10	1.98E 08	0.00E-01	3.05E 07
I	132	5.77E 01	1.54E 02	5.40E 01	5.40E 03	2.46E 02	0.00E-01	2.90E 01
I	133	2.09E 06	3.63E 06	1.11E 06	5.33E 08	6.33E 06	0.00E-01	3.26E 06
I	134	9.69E-05	2.63E-04	9.42E-05	4.56E-03	4.19E-04	0.00E-01	2.30E-07
I	135	3.90E 04	1.02E 05	3.77E 04	6.74E 06	1.64E 05	0.00E-01	1.15E 05
CS	134	4.67E 09	1.11E 10	9.08E 09	0.00E-01	3.59E 09	1.19E 09	1.94E 08
CS	136	4.20E 07	1.66E 08	1.19E 08	0.00E-01	9.22E 07	1.26E 07	1.88E 07
CS	137	6.36E 09	8.70E 09	5.70E 09	0.00E-01	2.95E 09	9.81E 08	1.68E 08
CS	138	3.94E-11	7.78E-11	3.86E-11	0.00E-01	5.72E-11	5.65E-12	3.32E-16
BA	139	2.90E-02	2.07E-05	8.50E-04	0.00E-01	1.93E-05	1.17E-05	5.15E-02
BA	140	1.29E 08	1.61E 05	8.42E 06	0.00E-01	5.49E 04	9.25E 04	2.65E 08
BA	141	1.28E-21	9.64E-25	4.31E-23	0.00E-01	8.96E-25	5.47E-25	6.01E-31
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	1.98E 03	9.99E 02	2.64E 02	0.00E-01	0.00E-01	0.00E-01	7.33E 07
LA	142	1.42E-04	6.44E-05	1.61E-05	0.00E-01	0.00E-01	0.00E-01	4.70E-01
CE	141	1.97E 05	1.33E 05	1.51E 04	0.00E-01	6.19E 04	0.00E-01	5.10E 08
CE	143	9.98E 02	7.38E 05	8.17E 01	0.00E-01	3.25E 02	0.00E-01	2.76E 07
CE	144	3.29E 07	1.38E 07	1.77E 06	0.00E-01	8.16E 06	0.00E-01	1.11E 10
PR	143	6.26E 04	2.51E 04	3.11E 03	0.00E-01	1.45E 04	0.00E-01	2.74E 08
PR	144	3.13E-26	1.30E-26	1.59E-27	0.00E-01	7.32E-27	0.00E-01	0.00E-01
ND	147	3.36E 04	3.89E 04	2.32E 03	0.00E-01	2.27E 04	0.00E-01	1.87E 08
W	187	3.82E 04	3.20E 04	1.12E 04	0.00E-01	0.00E-01	0.00E-01	1.05E 07
NP	239	1.43E 03	1.40E 02	7.74E 01	0.00E-01	4.38E 02	0.00E-01	2.88E 07

ATTACHMENT A  
(Page 134 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-14**  
VEGETATION PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	2.59E 03	2.59E 03	2.59E 03	2.59E 03	2.59E 03	2.59E 03
C	14	3.69E 08	7.38E 07	7.38E 07	7.38E 07	7.38E 07	7.38E 07	7.38E 07
NA	24	2.39E 05	2.39E 05	2.39E 05	2.39E 05	2.39E 05	2.39E 05	2.39E 05
P	32	1.61E 09	9.96E 07	6.23E 07	0.00E-01	0.00E-01	0.00E-01	1.35E 08
CR	51	0.00E-01	0.00E-01	6.17E 04	3.43E 04	1.35E 04	8.81E 04	1.04E 07
MN	54	0.00E-01	4.54E 08	9.01E 07	0.00E-01	1.36E 08	0.00E-01	9.32E 08
MN	56	0.00E-01	1.44E 01	2.55E 00	0.00E-01	1.82E 01	0.00E-01	9.45E 02
FE	55	3.25E 08	2.31E 08	5.38E 07	0.00E-01	0.00E-01	1.46E 08	9.98E 07
FE	59	1.79E 08	4.18E 08	1.62E 08	0.00E-01	0.00E-01	1.32E 08	9.90E 08
CO	58	0.00E-01	4.36E 07	1.01E 08	0.00E-01	0.00E-01	0.00E-01	6.01E 08
CO	60	0.00E-01	2.49E 08	5.60E 08	0.00E-01	0.00E-01	0.00E-01	3.24E 09
NI	63	1.61E 10	1.13E 09	5.44E 08	0.00E-01	0.00E-01	0.00E-01	1.81E 08
NI	65	6.45E 01	8.24E 00	3.76E 00	0.00E-01	0.00E-01	0.00E-01	4.47E 02
CU	64	0.00E-01	8.34E 03	3.92E 03	0.00E-01	2.11E 04	0.00E-01	6.47E 05
ZN	65	4.24E 08	1.47E 09	6.86E 08	0.00E-01	9.42E 08	0.00E-01	6.23E 08
ZN	69	8.21E-06	1.56E 05	1.10E-06	0.00E-01	1.02E-05	0.00E-01	2.88E-05
BR	83	0.00E-01	0.00E-01	2.92E 00	0.00E-01	0.00E-01	0.00E-01	5.08E-16
BR	84	0.00E-01	0.00E-01	2.27E-11	0.00E-01	0.00E-01	0.00E-01	3.14E-28
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	2.74E 08	1.29E 08	0.00E-01	0.00E-01	0.00E-01	4.05E 07
RB	88	0.00E-01	3.21E-22	1.71E-22	0.00E-01	0.00E-01	0.00E-01	2.75E-29
RB	89	0.00E-01	1.26E-26	8.94E-27	0.00E-01	0.00E-01	0.00E-01	1.94E-35
SR	89	1.51E 10	0.00E-01	4.34E 08	0.00E-01	0.00E-01	0.00E-01	1.80E 09
SR	90	7.51E 11	0.00E-01	1.85E 11	0.00E-01	0.00E-01	0.00E-01	2.11E 10
SR	91	2.83E 05	0.00E-01	1.13E 04	0.00E-01	0.00E-01	0.00E-01	1.28E 06
SR	92	3.98E 02	0.00E-01	1.70E 01	0.00E-01	0.00E-01	0.00E-01	1.01E 04
Y	90	1.24E 04	0.00E-01	3.34E 02	0.00E-01	0.00E-01	0.00E-01	1.02E 08
Y	91M	4.88E-09	0.00E-01	1.87E-10	0.00E-01	0.00E-01	0.00E-01	2.30E-07
Y	91	7.84E 06	0.00E-01	2.10E 05	0.00E-01	0.00E-01	0.00E-01	3.21E 09
Y	92	8.61E-01	0.00E-01	2.49E-02	0.00E-01	0.00E-01	0.00E-01	2.36E 04
Y	93	1.63E 02	0.00E-01	4.47E 00	0.00E-01	0.00E-01	0.00E-01	4.99E 06
ZR	95	1.72E 06	5.44E 05	3.74E 05	0.00E-01	7.99E 05	0.00E-01	1.25E 09
ZR	97	3.12E 02	6.18E 01	2.85E 01	0.00E-01	9.37E 01	0.00E-01	1.67E 07
NB	95	1.93E 05	1.07E 05	5.88E 04	0.00E-01	1.04E 05	0.00E-01	4.57E 08
MO	99	0.00E-01	5.65E 06	1.08E 06	0.00E-01	1.29E 07	0.00E-01	1.01E 07
TC	99M	2.74E 00	7.64E 00	9.90E 01	0.00E-01	1.14E 02	4.24E 00	5.02E 03

ATTACHMENT A  
(Page 135 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-14 (cont'd)**  
VEGETATION PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	7.76E-31	1.10E-30	1.08E-29	0.00E-01	2.00E-29	6.72E-31	0.00E-01
RU	103	6.81E 06	0.00E-01	2.91E 06	0.00E-01	2.40E 07	0.00E-01	5.69E 08
RU	105	5.01E 01	0.00E-01	1.94E 01	0.00E-01	6.32E 02	0.00E-01	4.04E 04
RU	106	3.09E 08	0.00E-01	3.90E 07	0.00E-01	5.97E 08	0.00E-01	1.48E 10
AG	110M	1.52E 07	1.43E 07	8.72E 06	0.00E-01	2.74E 07	0.00E-01	4.03E 09
TE	125M	1.48E 08	5.34E 07	1.98E 07	4.14E 07	0.00E-01	0.00E-01	4.39E 08
TE	127M	5.52E 08	1.96E 08	6.56E 07	1.31E 08	2.24E 09	0.00E-01	1.37E 09
TE	127	5.34E 03	1.89E 03	1.15E 03	3.68E 03	2.16E 04	0.00E-01	4.12E 05
TE	129M	3.62E 08	1.34E 08	5.73E 07	1.17E 08	1.51E 09	0.00E-01	1.36E 09
TE	129	7.16E-04	2.67E-04	1.74E-04	5.12E-04	3.01E-03	0.00E-01	3.92E-03
TE	131M	8.44E 05	4.05E 05	3.38E 05	6.09E 05	4.22E 06	0.00E-01	3.25E 07
TE	131	1.41E-14	5.80E-16	4.40E-16	1.08E-15	6.15E-15	0.00E-01	1.15E-16
TE	132	3.91E 06	2.48E 06	2.33E 06	2.61E 06	2.37E 07	0.00E-01	7.84E 07
I	130	3.51E 05	1.02E 06	4.05E 05	8.28E 07	1.56E 06	0.00E-01	7.80E 05
I	131	7.69E 07	1.08E 08	5.78E 07	3.14E 10	1.85E 08	0.00E-01	2.13E 07
I	132	5.20E 01	1.36E 02	4.89E 01	4.59E 03	2.14E 02	0.00E-01	5.93E 01
I	133	1.94E 06	3.29E 06	1.00E 06	4.59E 08	5.77E 06	0.00E-01	2.49E 06
I	134	8.76E-05	2.32E-04	8.34E-05	3.87E-03	3.66E-04	0.00E-01	3.06E-06
I	135	3.52E 04	9.07E 04	3.36E 04	5.84E 06	1.43E 05	0.00E-01	1.01E 05
CS	134	7.10E 09	1.67E 10	7.75E 09	0.00E-01	5.31E 09	2.03E 09	2.08E 08
CS	136	4.28E 07	1.68E 08	1.13E 08	0.00E-01	9.16E 07	1.44E 07	1.35E 07
CS	137	1.01E 10	1.35E 10	4.69E 09	0.00E-01	4.59E 09	1.78E 09	1.92E 08
CS	138	3.64E-11	6.98E-11	3.49E-11	0.00E-01	5.15E-11	6.00E-12	3.17E-14
BA	139	2.73E-02	1.92E-05	7.96E-04	0.00E-01	1.81E-05	1.32E-05	2.44E-01
BA	140	1.38E 08	1.69E 05	8.91E 06	0.00E-01	5.74E 04	1.14E 05	2.13E 08
BA	141	1.19E-21	8.90E-25	3.98E-23	0.00E-01	8.27E-25	6.10E-25	2.54E-27
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	1.81E 03	8.89E 02	2.37E 02	0.00E-01	0.00E-01	0.00E-01	5.11E 07
LA	142	1.30E-04	5.78E-05	1.44E-05	0.00E-01	0.00E-01	0.00E-01	1.76E 00
CE	141	2.83E 05	1.89E 05	2.17E 04	0.00E-01	8.90E 04	0.00E-01	5.41E 08
CE	143	9.33E 02	6.79E 05	7.58E 01	0.00E-01	3.04E 02	0.00E-01	2.04E 07
CE	144	5.27E 07	2.18E 07	2.83E 06	0.00E-01	1.30E 07	0.00E-01	1.33E 10
PR	143	7.01E 04	2.80E 04	3.49E 03	0.00E-01	1.63E 04	0.00E-01	2.31E 08
PR	144	2.93E-26	1.20E-26	1.49E-27	0.00E-01	6.88E-27	0.00E-01	3.23E-29
ND	147	3.66E 04	3.98E 04	2.38E 03	0.00E-01	2.34E 04	0.00E-01	1.44E 08
W	187	3.56E 04	2.90E 04	1.02E 04	0.00E-01	0.00E-01	0.00E-01	7.84E 06
NP	239	1.39E 02	1.31E 02	7.26E 01	0.00E-01	4.10E 02	0.00E-01	2.10E 07



ATTACHMENT A  
(Page 136 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-15  
VEGETATION PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	4.01E 03	4.01E 03	4.01E 03	4.01E 03	4.01E 03	4.01E 03
C	14	8.89E 08	1.78E 08	1.78E 08	1.78E 08	1.78E 08	1.78E 08	1.78E 08
NA	24	3.73E 05	3.73E 05	3.73E 05	3.73E 05	3.73E 05	3.73E 05	3.73E 05
P	32	3.37E 09	1.58E 08	1.30E 08	0.00E-01	0.00E-01	0.00E-01	9.30E 07
CR	51	0.00E-01	0.00E-01	1.17E 05	6.50E 04	1.78E 04	1.19E 05	6.21E 06
MN	54	0.00E-01	6.65E 08	1.77E 08	0.00E-01	1.86E 08	0.00E-01	5.58E 08
MN	56	0.00E-01	1.88E 01	4.24E 00	0.00E-01	2.27E 01	0.00E-01	2.72E 03
FE	55	8.00E 08	4.24E 08	1.31E 08	0.00E-01	0.00E-01	2.40E 08	7.86E 07
FE	59	3.97E 08	6.43E 08	3.20E 08	0.00E-01	0.00E-01	1.86E 08	6.69E 08
CO	58	0.00E-01	6.44E 07	1.97E 08	0.00E-01	0.00E-01	0.00E-01	3.76E 08
CO	60	0.00E-01	3.78E 08	1.12E 09	0.00E-01	0.00E-01	0.00E-01	2.10E 09
NI	63	3.95E 10	2.11E 09	1.34E 09	0.00E-01	0.00E-01	0.00E-01	1.42E 08
NI	65	1.18E 02	1.11E 01	6.51E 00	0.00E-01	0.00E-01	0.00E-01	1.37E 03
CU	64	0.00E-01	1.10E 04	6.65E 03	0.00E-01	2.66E 04	0.00E-01	5.16E 05
ZN	65	8.12E 08	2.16E 09	1.35E 09	0.00E-01	1.36E 09	0.00E-01	3.80E 08
ZN	69	1.51E-05	2.19E-05	2.02E-06	0.00E-01	1.33E-05	0.00E-01	1.38E-03
BR	83	0.00E-01	0.00E-01	5.38E 00	0.00E-01	0.00E-01	0.00E-01	3.14E-17
BR	84	0.00E-01	0.00E-01	3.85E-11	0.00E-01	0.00E-01	0.00E-01	1.94E-28
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	4.52E 08	2.78E 08	0.00E-01	0.00E-01	0.00E-01	2.91E 07
RB	88	0.00E-01	4.43E-22	3.08E-22	0.00E-01	0.00E-01	0.00E-01	2.17E-23
RB	89	0.00E-01	1.67E-26	1.48E-26	0.00E-01	0.00E-01	0.00E-01	1.45E-28
SR	89	3.60E 10	0.00E-01	1.03E 09	0.00E-01	0.00E-01	0.00E-01	1.39E 09
SR	90	1.24E 12	0.00E-01	3.15E 11	0.00E-01	0.00E-01	0.00E-01	1.67E 10
SR	91	5.21E 05	0.00E-01	1.97E 04	0.00E-01	0.00E-01	0.00E-01	1.15E 06
SR	92	7.29E 02	0.00E-01	2.92E 01	0.00E-01	0.00E-01	0.00E-01	1.38E 04
Y	90	2.30E 04	0.00E-01	6.17E 02	0.00E-01	0.00E-01	0.00E-01	6.56E 07
Y	91M	8.95E-09	0.00E-01	3.26E-10	0.00E-01	0.00E-01	0.00E-01	1.75E-05
Y	91	1.86E 07	0.00E-01	4.99E 03	0.00E-01	0.00E-01	0.00E-01	2.48E 09
Y	92	1.59E 00	0.00E-01	4.54E-02	0.00E-01	0.00E-01	0.00E-01	4.58E 04
Y	93	3.01E 02	0.00E-01	8.26E 00	0.00E-01	0.00E-01	0.00E-01	4.48E 06
ZR	95	3.86E 06	8.49E 05	7.56E 05	0.00E-01	1.22E 06	0.00E-01	8.85E 08
ZR	97	5.70E 02	8.24E 01	4.86E 01	0.00E-01	1.18E 02	0.00E-01	1.25E 07
NB	95	4.11E 05	1.60E 05	1.14E 05	0.00E-01	1.50E 05	0.00E-01	2.96E 08
MO	99	0.00E-01	7.71E 06	1.91E 06	0.00E-01	1.65E 07	0.00E-01	6.38E 06
TC	99M	4.71E 00	9.24E 00	1.51E 02	0.00E-01	1.34E 02	4.69E 00	5.26E 03

ATTACHMENT A  
(Page 137 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-15 (cont'd)**  
VEGETATION PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD (RI FACTORS)

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	1.43E-30	1.49E-30	1.89E-29	0.00E-01	2.55E-29	7.90E-31	4.75E-30
RU	103	1.53E 07	0.00E-01	5.88E 06	0.00E-01	3.85E 07	0.00E-01	3.96E 08
RU	105	9.17E 01	0.00E-01	3.33E 01	0.00E-01	8.06E 02	0.00E-01	5.99E 04
RU	106	7.45E 08	0.00E-01	9.30E 07	0.00E-01	1.01E 09	0.00E-01	1.16E 10
AG	110M	3.21E 07	2.17E 07	1.73E 07	0.00E-01	4.04E 07	0.00E-01	2.58E 09
TE	125M	3.51E 08	9.50E 07	4.67E 07	9.84E 07	0.00E-01	0.00E-01	3.38E 08
TE	127M	1.32E 09	3.56E 08	1.57E 08	3.16E 08	3.77E 09	0.00E-01	1.07E 09
TE	127	9.85E 03	2.66E 03	2.11E 03	6.82E 03	2.80E 04	0.00E-01	3.85E 05
TE	129M	8.41E 08	2.35E 08	1.30E 08	2.71E 08	2.47E 09	0.00E-01	1.03E 09
TE	129	1.33E-03	3.70E-04	3.15E-04	9.46E-04	3.88E-03	0.00E-01	8.25E-02
TE	131M	1.54E 06	5.33E 05	5.68E 05	1.10E 06	5.16E 06	0.00E-01	2.16E 07
TE	131	2.59E-15	7.90E-16	7.71E-16	1.98E-15	7.84E-15	0.00E-01	1.36E-14
TE	132	7.00E 06	3.10E 06	3.74E 06	4.51E 06	2.88E 07	0.00E-01	3.12E 07
I	130	6.16E 05	1.24E 06	6.41E 05	1.37E 08	1.86E 06	0.00E-01	5.82E 05
I	131	1.43E 08	1.44E 08	8.17E 07	4.76E 10	2.36E 08	0.00E-01	1.28E 07
I	132	9.23E 01	1.70E 02	7.80E 01	7.87E 03	2.60E 02	0.00E-01	2.00E 02
I	133	3.53E 06	4.37E 06	1.65E 06	8.12E 08	7.28E 06	0.00E-01	1.76E 06
I	134	1.56E-04	2.89E-04	1.33E-04	6.65E-04	4.42E-04	0.00E-01	1.92E-04
I	135	6.26E 04	1.13E 05	5.33E 04	9.98E 06	1.73E 05	0.00E-01	8.59E 04
CS	134	1.60E 10	2.63E 10	5.55E 09	0.00E-01	8.15E 09	2.93E 09	1.42E 08
CS	136	8.04E 07	2.21E 08	1.43E 08	0.00E-01	1.18E 08	1.76E 07	7.77E 06
CS	137	2.39E 10	2.29E 10	3.38E 09	0.00E-01	7.46E 09	2.68E 09	1.43E 08
CS	138	6.61E-11	9.20E-11	5.83E-11	0.00E-01	6.47E-11	6.96E-12	4.24E-11
BA	139	5.04E-02	2.69E-05	1.46E-03	0.00E-01	2.35E-05	1.58E-05	2.91E 00
BA	140	2.77E 08	2.43E 05	1.62E 07	0.00E-01	7.90E 04	1.45E 05	1.40E 08
BA	141	2.20E-21	1.23E-24	7.16E-23	0.00E-01	1.07E-24	7.24E-24	1.25E-21
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	3.25E 03	1.14E 03	3.83E 02	0.00E-01	0.00E-01	0.00E-01	3.17E 07
LA	142	2.36E-04	7.51E-05	2.35E-05	0.00E-01	0.00E-01	0.00E-01	1.49E 01
CE	141	6.56E 05	3.27E 05	4.86E 04	0.00E-01	1.43E 05	0.00E-01	4.08E 08
CE	143	1.72E 03	9.31E 05	1.35E 02	0.00E-01	3.91E 02	0.00E-01	1.36E 07
CE	144	1.27E 08	3.98E 07	6.78E 06	0.00E-01	2.21E 07	0.00E-01	1.04E 10
PR	143	1.46E 05	4.38E 04	7.23E 03	0.00E-01	2.37E 04	0.00E-01	1.57E 08
PR	144	5.44E-26	1.68E-26	2.74E-27	0.00E-01	8.90E-27	0.00E-01	3.62E-23
ND	147	7.24E 04	5.86E 04	4.54E 03	0.00E-01	3.22E 04	0.00E-01	9.29E 07
W	187	6.47E 04	3.83E 04	1.72E 04	0.00E-01	0.00E-01	0.00E-01	5.38E 07
NP	239	2.56E 03	1.84E 02	1.29E 02	0.00E-01	5.31E 02	0.00E-01	1.36E 07

ATTACHMENT A  
(Page 138 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-16**

## GROUND PLANE PATHWAY FACTOR

M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC

(RI FACTOR)

H-3	0.00E 00	Y-91M	1.00E 05	CS-134	6.86E 09
C-14	0.00E 00	Y-91	1.07E 06	CS-136	1.49E 08
NA-24	1.19E 07	Y-92	1.80E 05	CS-137	1.03E 10
P-32	0.00E 00	Y-93	1.85E 05	CS-138	3.59E 05
CR-51	4.66E 06	ZR-95	2.45E 08	BA-139	1.06E 05
MN-54	1.39E 09	ZR-97	2.96E 06	BA-140	2.05E 07
MN-56	9.03E 05	NB-95	1.37E 08	BA-141	4.18E 04
FE-55	0.00E 00	MO-99	3.99E 06	BA-142	4.49E 04
FE-59	2.73E 08	TC-99M	1.84E 05	LA-140	1.92E 07
		TC-101	2.04E 04		
CO-58	3.79E 08	RU-103	1.08E 08	LA-142	7.37E 05
CO-60	2.15E 10	RU-105	6.36E 05	CE-141	1.37E 07
NI-63	0.00E 00	RU-106	4.21E 08	CE-143	2.31E 06
NI-65	3.02E 05	AG-110M	3.44E 09	CE-144	6.96E 07
CU-64	6.07E 05	TE-125M	1.55E 06	PR-143	0.00E 00
ZN-65	7.46E 08	TE-127M	9.17E 04	PR-144	1.83E 03
ZN-69	0.00E 00	TE-127	2.98E 03	ND-147	8.46E 06
BR-83	4.87E 03	TE-129M	1.98E 07	W-187	2.36E 06
BR-84	2.03E 05	TE-129	2.62E 04	NP-239	1.71E 06
BR-85	0.00E 00	TE-131M	8.03E 06		
RB-86	8.99E 06	TE-131	2.92E 04		
RB-88	3.31E 04	TE-132	4.23E 06		
RB-89	1.21E 05	I-130	5.51E 06		
SR-89	2.16E 04	I-131	1.72E 07		
SR-90	0.00E 00	I-132	1.25E 06		
SR-91	2.14E 06	I-133	2.45E 06		
SR-92	7.77E 05	I-134	4.47E 05		
Y-90	4.49E 03	I-135	2.53E 06		

ATTACHMENT A  
(Page 139 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-17  
GRASS-GOAT-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	1.56E 03	1.56E 03	1.56E 03	1.56E 03	1.56E 03	1.56E 03
C	14	2.63E 08	5.27E 07	5.27E 07	5.27E 07	5.27E 07	5.27E 07	5.27E 07
NA	24	2.93E 05	2.93E 05	2.93E 05	2.93E 05	2.93E 05	2.93E 05	2.93E 05
P	32	2.05E 10	1.27E 09	7.93E 08	0.00E-01	0.00E-01	0.00E-01	2.31E 09
CR	51	0.00E-01	0.00E-01	3.43E 03	2.05E 03	7.55E 02	4.55E 03	8.62E 05
MN	54	0.00E-01	1.01E 06	1.93E 05	0.00E-01	3.00E 05	0.00E-01	3.09E 06
MN	56	0.00E-01	4.99E-03	8.85E-04	0.00E-01	6.34E-03	0.00E-01	1.59E-01
FE	55	3.26E 05	2.25E 05	5.26E 04	0.00E-01	0.00E-01	1.26E 05	1.29E 05
FE	59	3.86E 05	9.07E 05	3.48E 05	0.00E-01	0.00E-01	2.54E 05	3.02E 06
CO	58	0.00E-01	5.66E 05	1.27E 06	0.00E-01	0.00E-01	0.00E-01	1.15E 07
CO	60	0.00E-01	1.97E 06	4.34E 06	0.00E-01	0.00E-01	0.00E-01	3.70E 07
NI	63	8.07E 08	5.65E 07	2.71E 07	0.00E-01	0.00E-01	0.00E-01	1.17E 07
NI	65	5.56E-02	7.22E-03	3.30E-03	0.00E-01	0.00E-01	0.00E-01	1.83E-01
CU	64	0.00E-01	2.66E 03	1.25E 03	0.00E-01	6.70E 03	0.00E-01	2.27E 05
ZN	65	1.65E 08	5.24E 08	2.37E 08	0.00E-01	3.50E 08	0.00E-01	3.30E 08
ZN	69	6.27E-13	1.20E-12	8.34E-14	0.00E-01	7.79E-13	0.00E-01	1.80E-13
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	3.11E 08	1.45E 08	0.00E-01	0.00E-01	0.00E-01	6.14E 07
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	3.05E 09	0.00E-01	8.75E 07	0.00E-01	0.00E-01	0.00E-01	4.89E 08
SR	90	9.83E 10	0.00E-01	2.41E 10	0.00E-01	0.00E-01	0.00E-01	2.84E 09
SR	91	6.02E 04	0.00E-01	2.43E 03	0.00E-01	0.00E-01	0.00E-01	2.87E 05
SR	92	1.03E 00	0.00E-01	4.45E-01	0.00E-01	0.00E-01	0.00E-01	2.04E 01
Y	90	8.49E 00	0.00E-01	2.28E-00	0.00E-01	0.00E-01	0.00E-01	9.00E 04
Y	91M	7.24E-21	0.00E-01	2.80E-22	0.00E-01	0.00E-01	0.00E-01	2.13E-20
Y	91	1.03E 03	0.00E-01	2.76E 01	0.00E-01	0.00E-01	0.00E-01	5.67E 05
Y	92	6.71E-06	0.00E-01	1.96E-07	0.00E-01	0.00E-01	0.00E-01	1.18E-01
Y	93	2.80E-02	0.00E-01	7.73E-04	0.00E-01	0.00E-01	0.00E-01	8.87E 02
ZR	95	1.13E 02	3.63E 01	2.46E 01	0.00E-01	5.70E 01	0.00E-01	1.15E 05
ZR	97	5.20E-02	1.05E-01	4.80E-03	0.00E-01	1.58E-01	0.00E-01	3.25E 03
NB	95	9.91E 03	5.51E 03	2.96E 03	0.00E-01	5.45E 03	0.00E-01	3.35E 07
MO	99	0.00E-01	2.97E 06	5.65E 05	0.00E-01	6.73E 06	0.00E-01	6.89E 06
TC	99M	3.99E-01	1.13E 00	1.44E 01	0.00E-01	1.71E 01	5.53E-01	6.67E 02

ATTACHMENT A  
(Page 140 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-17 (cont'd)**  
GRASS-GOAT-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
ADULT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	1.22E 02	0.00E-01	5.26E 01	0.00E-01	4.66E 02	0.00E-01	1.43E 04
RU	105	1.03E-04	0.00E-01	4.07E-05	0.00E-01	1.33E-03	0.00E-01	6.30E-02
RU	106	2.45E 03	0.00E-01	3.10E 02	0.00E-01	4.73E 03	0.00E-01	1.58E 05
AG	110M	6.99E 06	6.46E 06	3.84E 06	0.00E-01	1.27E 07	0.00E-01	2.64E 09
TE	125M	1.95E 06	7.08E 05	2.62E 05	5.88E 05	7.95E 06	0.00E-01	7.81E 06
TE	127M	5.49E 06	1.96E 06	6.70E 05	1.40E 06	2.23E 07	0.00E-01	1.84E 07
TE	127	7.84E 01	2.82E 01	1.70E 01	5.81E 01	3.19E 02	0.00E-01	6.19E 03
TE	129M	7.22E 06	2.69E 06	1.14E 06	2.48E 06	3.02E 07	0.00E-01	3.64E 07
TE	129	3.41E-11	1.28E-11	8.31E-12	2.62E-11	1.43E-10	0.00E-01	2.57E-11
TE	131M	4.33E 04	2.12E 04	1.77E 04	3.36E 04	2.15E 05	0.00E-01	2.10E 06
TE	131	4.40E-34	1.84E-34	1.39E-34	3.62E-34	1.93E-33	0.00E-01	6.23E-35
TE	132	2.88E 05	1.86E 05	1.75E 05	2.06E 05	1.80E 06	0.00E-01	8.82E 06
I	130	5.04E 05	1.49E 06	5.87E 05	1.26E 08	2.32E 06	0.00E-01	1.28E 06
I	131	3.55E 08	5.08E 08	2.91E 08	1.67E 11	8.71E 08	0.00E-01	1.34E 08
I	132	1.98E-00	5.29E-00	1.85E-00	1.85E 01	8.43E-00	0.00E-01	9.94E-01
I	133	4.65E 06	8.08E 06	2.46E 06	1.19E 09	1.41E 07	0.00E-01	7.26E 06
I	134	2.44E-12	6.63E-12	2.37E-12	1.15E-10	1.05E-11	0.00E-01	5.78E-15
I	135	1.54E 04	4.04E 04	1.49E 04	2.66E 06	6.48E 04	0.00E-01	4.56E 04
CS	134	1.70E 10	4.04E 10	3.30E 10	0.00E-01	1.31E 10	4.34E 09	7.06E 08
CS	136	7.83E 08	3.09E 09	2.23E 09	0.00E-01	1.72E 09	2.36E 08	3.51E 08
CS	137	2.21E 10	3.03E 10	1.98E 10	0.00E-01	1.03E 10	3.42E 09	5.86E 08
CS	138	2.75E-23	5.43E-23	2.69E-23	0.00E-01	3.99E-23	3.94E-24	2.32E-28
BA	139	5.48E-09	3.90E-12	1.60E-10	0.00E-01	3.65E-12	2.21E-12	9.71E-09
BA	140	3.23E 06	4.05E 03	2.11E 05	0.00E-01	1.38E 03	2.32E 03	6.64E 06
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	5.43E-01	2.73E-01	7.23E-02	0.00E-01	0.00E-01	0.00E-01	2.01E 04
LA	142	1.13E-12	5.12E-13	1.28E-13	0.00E-01	0.00E-01	0.00E-01	3.74E-09
CE	141	5.81E 02	3.93E 02	4.46E 01	0.00E-01	1.83E 02	0.00E-01	1.50E 06
CE	143	4.99E 00	3.69E 03	4.08E-00	0.00E-01	1.62E 00	0.00E-01	1.38E 05
CE	144	4.29E 04	1.79E 04	2.30E 03	0.00E-01	1.06E 04	0.00E-01	1.45E 07
PR	143	1.90E 01	7.60E 00	9.39E-00	0.00E-01	4.39E 00	0.00E-01	8.30E 04
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	1.14E 01	1.31E 01	7.85E-01	0.00E-01	7.67E 00	0.00E-01	6.30E 04
W	187	7.87E 02	6.58E 02	2.30E 02	0.00E-01	0.00E-01	0.00E-01	2.16E 05
NP	239	4.41E-01	4.33E-02	2.39E-02	0.00E-01	1.35E-01	0.00E-01	8.89E 03



ATTACHMENT A  
(Page 142 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-18 (cont'd)  
GRASS-GOAT-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
TEEN

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
RU	103	2.17E 02	0.00E-01	9.28E 01	0.00E-01	7.66E 02	0.00E-01	1.81E 04
RU	105	1.88E-04	0.00E-01	7.30E-05	0.00E-01	2.37E-03	0.00E-01	1.52E-01
RU	106	4.50E 03	0.00E-01	5.67E 02	0.00E-01	8.68E 03	0.00E-01	2.16E 05
AG	110M	1.16E 07	1.09E 07	6.65E 06	0.00E-01	2.08E 07	0.00E-01	3.07E 09
TE	125M	3.60E 06	1.30E 06	4.82E 05	1.01E 06	0.00E-01	0.00E-01	1.06E 07
TE	127M	1.01E 07	3.59E 06	1.20E 06	2.41E 06	4.10E 07	0.00E-01	2.52E 07
TE	127	1.45E 02	5.15E 01	3.13E 01	1.00E 02	5.89E 02	0.00E-01	1.12E 04
TE	129M	1.32E 07	4.90E 06	2.09E 06	4.26E 06	5.53E 07	0.00E-01	4.96E 07
TE	129	6.28E-11	2.34E-11	1.53E-11	4.48E-11	2.63E-10	0.00E-01	3.43E-10
TE	131M	7.89E 04	3.78E 04	3.16E 04	5.69E 04	3.94E 05	0.00E-01	3.04E 06
TE	131	8.04E-34	3.31E-34	2.51E-34	6.19E-34	3.51E-33	0.00E-01	6.60E-35
TE	132	5.15E 05	3.26E 05	3.07E 05	3.44E 05	3.13E 06	0.00E-01	1.03E 07
I	130	8.87E 05	2.57E 06	1.02E 06	2.09E 08	3.95E 06	0.00E-01	1.97E 06
I	131	6.45E 08	9.03E 08	4.85E 08	2.63E 11	1.55E 09	0.00E-01	1.79E 08
I	132	3.51E-01	9.18E-01	3.29E-01	3.09E 01	1.45E 00	0.00E-01	4.00E-01
I	133	8.49E 06	1.44E 07	4.39E 06	2.01E 09	2.52E 07	0.00E-01	1.09E 07
I	134	4.34E-12	1.15E-11	4.13E-12	1.92E-10	1.81E-11	0.00E-01	1.51E-13
I	135	2.74E 04	7.05E 04	2.61E 04	4.54E 06	1.11E 05	0.00E-01	7.82E 04
CS	134	2.94E 10	6.93E 10	3.22E 10	0.00E-01	2.20E 10	8.41E 09	8.62E 08
CS	136	1.33E 09	5.25E 09	3.52E 09	0.00E-01	2.86E 09	4.50E 08	4.22E 08
CS	137	4.02E 10	5.34E 10	1.86E 10	0.00E-01	1.82E 10	7.06E 09	7.60E 08
CS	138	4.99E-23	9.58E-23	4.79E-23	0.00E-01	7.07E-23	8.23E-24	4.34E-26
BA	139	1.01E-08	7.13E-12	2.95E-10	0.00E-01	6.72E-12	4.91E-12	9.04E-08
BA	140	5.82E 06	7.14E 03	3.75E 05	0.00E-01	2.42E 03	4.08E 03	8.98E 06
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	9.75E-01	4.79E-01	1.27E-01	0.00E-01	0.00E-01	0.00E-01	2.75E 04
LA	142	2.03E-12	9.03E 13	2.25E-13	0.00E-01	0.00E-01	0.00E-01	2.75E-08
CE	141	1.07E 03	7.12E 02	8.18E 01	0.00E-01	3.35E 02	0.00E-01	2.04E 06
CE	143	9.17E 00	6.67E 03	7.45E-00	0.00E-01	2.99E 00	0.00E-01	2.01E 05
CE	144	7.90E 04	3.27E 04	4.24E 03	0.00E-01	1.95E 04	0.00E-01	1.99E 07
PR	143	3.48E 01	1.39E 00	1.73E 00	0.00E-01	8.08E 00	0.00E-01	1.15E 05
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	2.19E 01	2.38E 01	1.42E 00	0.00E-01	1.40E 01	0.00E-01	8.57E 04
W	187	1.44E 03	1.17E 03	4.11E 02	0.00E-01	0.00E-01	0.00E-01	3.18E 05
NP	239	8.41E-01	7.93E-02	4.41E-02	0.00E-01	2.49E-01	0.00E-01	1.28E 04





ATTACHMENT A  
(Page 144 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-19 (cont'd)**  
GRASS-GOAT-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
CHILD

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
RU	103	5.14E-02	0.00E-01	1.97E-02	0.00E-01	1.29E-03	0.00E-01	1.33E-04
RU	105	4.59E-04	0.00E-01	1.67E-04	0.00E-01	4.04E-03	0.00E-01	3.00E-01
RU	106	1.11E-04	0.00E-01	1.38E-03	0.00E-01	1.50E-04	0.00E-01	1.72E-05
AG	110M	2.51E-07	1.69E-07	1.35E-07	0.00E-01	3.15E-07	0.00E-01	2.01E-09
TE	125M	8.85E-06	2.40E-06	1.18E-06	2.48E-06	0.00E-01	0.00E-01	8.54E-06
TE	127M	2.50E-07	6.72E-06	2.96E-06	5.97E-06	7.12E-07	0.00E-01	2.02E-07
TE	127	3.57E-02	9.64E-01	7.67E-01	2.47E-02	1.02E-03	0.00E-01	1.40E-04
TE	129M	3.26E-07	9.09E-06	5.05E-06	1.05E-07	9.56E-07	0.00E-01	3.97E-07
TE	129	1.55E-10	4.32E-11	3.68E-11	1.11E-10	4.53E-10	0.00E-01	9.64E-09
TE	131M	1.92E-05	6.64E-04	7.07E-04	1.37E-05	6.43E-05	0.00E-01	2.69E-06
TE	131	1.97E-33	6.01E-34	5.87E-34	1.51E-33	5.97E-33	0.00E-01	1.04E-32
TE	132	1.23E-06	5.44E-05	6.58E-05	7.93E-05	5.05E-06	0.00E-01	5.48E-06
I	130	2.07E-06	4.19E-06	2.16E-06	4.62E-08	6.27E-06	0.00E-01	1.96E-06
I	131	1.56E-09	1.57E-09	8.94E-08	5.20E-11	2.58E-09	0.00E-01	1.40E-08
I	132	8.30E-01	1.52E-00	7.01E-01	7.07E-01	2.33E-00	0.00E-01	1.79E-00
I	133	2.06E-07	2.55E-07	9.65E-06	4.74E-09	4.25E-07	0.00E-01	1.03E-07
I	134	1.03E-11	1.91E-11	8.77E-12	4.39E-10	2.92E-11	0.00E-01	1.26E-11
I	135	6.49E-04	1.17E-05	5.52E-04	1.03E-07	1.79E-05	0.00E-01	8.90E-04
CS	134	6.79E-10	1.11E-11	2.35E-10	0.00E-01	3.45E-10	1.24E-10	6.01E-08
CS	136	3.01E-09	8.27E-09	5.35E-09	0.00E-01	4.40E-09	6.57E-08	2.91E-08
CS	137	9.67E-10	9.26E-10	1.37E-10	0.00E-01	3.02E-10	1.09E-10	5.80E-08
CS	138	1.21E-22	1.68E-22	1.07E-22	0.00E-01	1.18E-22	1.27E-23	7.74E-23
BA	139	2.49E-08	1.33E-11	7.21E-10	0.00E-01	1.16E-11	7.82E-12	1.44E-06
BA	140	1.41E-07	1.23E-04	8.21E-05	0.00E-01	4.01E-03	7.34E-03	7.12E-06
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	2.33E-00	8.16E-00	2.75E-01	0.00E-01	0.00E-01	0.00E-01	2.27E-04
LA	142	4.91E-12	1.56E-12	4.90E-13	0.00E-01	0.00E-01	0.00E-01	3.10E-07
CE	141	2.63E-03	1.31E-03	1.94E-02	0.00E-01	5.74E-02	0.00E-01	1.63E-06
CE	143	2.25E-01	1.22E-04	1.77E-00	0.00E-01	5.12E-00	0.00E-01	1.79E-05
CE	144	1.95E-05	6.11E-04	1.04E-04	0.00E-01	3.38E-04	0.00E-01	1.59E-07
PR	143	8.62E-01	2.59E-01	4.28E-00	0.00E-01	1.40E-01	0.00E-01	9.30E-04
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	5.36E-01	4.34E-01	3.36E-00	0.00E-01	2.38E-01	0.00E-01	6.88E-04
W	187	3.49E-03	2.07E-03	9.28E-02	0.00E-01	0.00E-01	0.00E-01	2.90E-05
NP	239	2.07E-00	1.49E-01	1.04E-01	0.00E-01	4.30E-01	0.00E-01	1.10E-04

ATTACHMENT A  
(Page 145 of 152)

## OFFSITE DOSE CALCULATION MANUAL

TABLE A.5-20  
GRASS-GOAT-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
INFANT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
H	3	0.00E-01	4.86E 03	4.86E 03	4.86E 03	4.86E 03	4.86E 03	4.86E 03
C	14	2.34E 09	5.00E 08	5.00E 08	5.00E 08	5.00E 08	5.00E 08	5.00E 08
NA	24	1.85E 06	1.85E 06	1.85E 06	1.85E 06	1.85E 06	1.85E 06	1.85E 06
P	32	1.92E 11	1.13E 10	7.45E 09	0.00E-01	0.00E-01	0.00E-01	2.60E 09
CR	51	0.00E-01	0.00E-01	1.94E 04	1.26E 04	2.76E 03	2.46E 04	5.64E 05
MN	54	0.00E-01	4.68E 06	1.06E 06	0.00E-01	1.04E 06	0.00E-01	1.72E 06
MN	56	0.00E-01	3.78E-03	6.51E-04	0.00E-01	3.25E-03	0.00E-01	3.43E-01
FE	55	1.76E 06	1.13E 06	3.03E 06	0.00E-01	0.00E-01	5.54E 05	1.44E 05
FE	59	2.92E 06	5.09E 06	2.01E 06	0.00E-01	0.00E-01	1.51E 06	2.43E 06
CO	58	0.00E-01	2.91E 06	7.26E 06	0.00E-01	0.00E-01	0.00E-01	7.25E 06
CO	60	0.00E-01	1.06E 07	2.50E 07	0.00E-01	0.00E-01	0.00E-01	2.52E 07
NI	63	4.19E 09	2.59E 08	1.45E 08	0.00E-01	0.00E-01	0.00E-01	1.29E 07
NI	65	5.27E-01	5.96E-02	2.71E-02	0.00E-01	0.00E-01	0.00E-01	4.54E 00
CU	64	0.00E-01	2.07E 04	9.58E 03	0.00E-01	3.50E 04	0.00E-01	4.25E 05
ZN	65	6.66E 08	2.28E 09	1.05E 09	0.00E-01	1.11E 09	0.00E-01	1.93E 09
ZN	69	6.04E-12	1.09E-11	8.10E-13	0.00E-01	4.52E-12	0.00E-01	8.87E-10
BR	83	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	84	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BR	85	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	86	0.00E-01	2.67E 09	1.32E 09	0.00E-01	0.00E-01	0.00E-01	6.83E 07
RB	88	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RB	89	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
SR	89	2.64E 10	0.00E-01	7.58E 08	0.00E-01	0.00E-01	0.00E-01	5.43E 08
SR	90	2.55E 11	0.00E-01	6.50E 10	0.00E-01	0.00E-01	0.00E-01	3.19E 09
SR	91	5.65E 05	0.00E-01	2.05E 03	0.00E-01	0.00E-01	0.00E-01	6.69E 05
SR	92	9.78E 00	0.00E-01	3.63E-01	0.00E-01	0.00E-01	0.00E-01	1.05E 02
Y	90	8.16E 01	0.00E-01	2.19E 00	0.00E-01	0.00E-01	0.00E-01	1.13E 05
Y	91M	6.87E-20	0.00E-01	2.34E-21	0.00E-01	0.00E-01	0.00E-01	2.29E-16
Y	91	8.79E 03	0.00E-01	2.34E 02	0.00E-01	0.00E-01	0.00E-01	6.30E 05
Y	92	6.47E-05	0.00E-01	1.82E-06	0.00E-01	0.00E-01	0.00E-01	1.23E 00
Y	93	2.70E-01	0.00E-01	7.36E-03	0.00E-01	0.00E-01	0.00E-01	2.13E 03
ZR	95	8.17E 02	1.99E 02	1.41E 02	0.00E-01	2.14E 02	0.00E-01	9.91E 04
ZR	97	4.88E-01	8.37E-02	3.82E-02	0.00E-01	8.44E-02	0.00E-01	5.34E 03
NB	95	7.12E 04	2.93E 04	1.70E 04	0.00E-01	2.10E 04	0.00E-01	2.48E 07
MO	99	0.00E-01	2.50E 07	4.87E 06	0.00E-01	3.73E 07	0.00E-01	8.22E 06
TC	99M	3.30E 00	6.81E 00	8.77E 01	0.00E-01	7.33E 01	3.56E 00	1.98E 03

ATTACHMENT A  
(Page 146 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**TABLE A.5-20 (cont'd)**  
GRASS-GOAT-MILK PATHWAY FACTOR  
M<sup>2</sup> MREM/YR PER  $\mu$ CI/SEC  
INFANT

NUCLIDE		BONE	LIVER	T BODY	THYROID	KIDNEY	LUNG	GI-LLI
TC	101	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
RU	103	1.04E 03	0.00E-01	3.48E 02	0.00E-01	2.16E 03	0.00E-01	1.26E 04
RU	105	9.68E-04	0.00E-01	3.26E-04	0.00E-01	7.12E-03	0.00E-01	3.85E-01
RU	106	2.28E 04	0.00E-01	2.85E 03	0.00E-01	2.70E 04	0.00E-01	1.73E 05
AG	110M	4.63E 07	3.38E 07	2.24E 07	0.00E-01	4.83E 07	0.00E-01	1.75E 09
TE	125M	1.81E 07	6.05E 06	2.45E 06	6.09E 06	0.00E-01	0.00E-01	8.62E 06
TE	127M	5.05E 07	1.68E 07	6.12E 06	1.46E 07	1.24E 08	0.00E-01	2.04E 07
TE	127	7.59E 02	2.54E 02	1.63E 02	6.18E 02	1.85E 03	0.00E-01	1.59E 04
TE	129M	6.69E 07	2.29E 07	1.03E 07	2.57E 07	1.67E 08	0.00E-01	3.99E 07
TE	129	3.28E-10	1.13E-10	7.66E-11	2.75E-10	8.17E-10	0.00E-01	2.62E-08
TE	131M	4.05E 05	1.63E 05	1.35E 05	3.31E 05	1.12E 06	0.00E-01	2.75E 06
TE	131	4.18E-33	1.54E-33	1.17E-33	3.73E-33	1.07E-32	0.00E-01	1.69E-31
TE	132	2.53E 06	1.25E 06	1.17E 06	1.85E 06	7.84E 06	0.00E-01	4.64E 06
I	130	4.26E 06	9.38E 06	3.76E 06	1.05E 09	1.03E 07	0.00E-01	2.01E 06
I	131	3.26E 09	3.85E 09	1.69E 09	1.26E 12	4.49E 09	0.00E-01	1.37E 08
I	132	1.72E 00	3.49E 00	1.24E 00	1.64E 02	3.90E 00	0.00E-01	2.83E 00
I	133	4.35E 07	6.34E 07	1.86E 07	1.15E 10	7.45E 07	0.00E-01	1.07E 07
I	134	2.13E-11	4.36E-11	1.55E-11	1.02E-09	4.88E-11	0.00E-01	4.51E-11
I	135	1.35E 05	2.68E 05	9.79E 04	2.41E 07	2.99E 05	0.00E-01	9.71E 04
CS	134	1.09E 11	2.04E 11	2.06E 10	0.00E-01	5.25E 10	1.86E 10	5.54E 08
CS	136	5.88E 09	1.73E 10	6.45E 09	0.00E-01	6.89E 09	1.41E 09	2.63E 08
CS	137	1.54E 11	1.81E 11	1.28E 10	0.00E-01	4.85E 10	1.96E 10	5.65E 08
CS	138	2.55E-22	4.15E-22	2.01E-22	0.00E-01	2.07E-22	3.23E-23	6.63E-22
BA	139	5.30E-08	3.51E-11	1.53E-09	0.00E-01	2.11E-11	2.13E-11	3.35E-06
BA	140	2.89E 07	2.89E 04	1.49E 06	0.00E-01	6.87E 03	1.78E 04	7.11E 06
BA	141	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
BA	142	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
LA	140	4.88E 00	1.92E 00	4.94E-00	0.00E-01	0.00E-01	0.00E-01	2.26E 04
LA	142	1.03E-11	3.78E-12	9.06E-13	0.00E-01	0.00E-01	0.00E-01	6.43E-07
CE	141	5.20E 03	3.17E 03	3.74E 02	0.00E-01	9.79E 02	0.00E-01	1.64E 06
CE	143	4.76E 01	3.16E 04	3.61E 00	0.00E-01	9.21E 00	0.00E-01	1.84E 05
CE	144	2.79E 05	1.14E 05	1.56E 04	0.00E-01	4.62E 04	0.00E-01	1.60E 07
PR	143	1.78E 02	6.67E 01	8.84E 00	0.00E-01	2.48E 01	0.00E-01	9.41E 04
PR	144	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
ND	147	1.06E 02	1.09E 02	6.69E 00	0.00E-01	4.21E 01	0.00E-01	6.92E 04
W	187	7.35E 03	5.11E 03	1.77E 03	0.00E-01	0.00E-01	0.00E-01	3.00E 05
NP	239	4.38E 00	3.91E-01	2.21E-01	0.00E-01	7.80E-01	0.00E-01	1.13E 04

Revision: 9

OFFSITE DOSE CALCULATION MANUAL

AP 07B-003

Information Use

Page 155 of 160

ATTACHMENT A  
(Page 147 of 152)

OFFSITE DOSE CALCULATION MANUAL

APPENDIX B

Meteorological Model

ATTACHMENT A  
(Page 148 of 152)

## OFFSITE DOSE CALCULATION MANUAL

**APPENDIX B**

The X/Qs and D/Qs are calculated using the computer code XOQDOQ which implements the guidance of Regulatory Guide 1.111.

The constant mean wind direction model, as defined in equation 3 of Regulatory Guide 1.111, is used to calculate X/Q values.

$$(X/Q)_D = \frac{2.032 \sum_{ij} n_{ij} \exp[-h_e^2/2 \sigma_{zj}^2(x)]}{N \times \bar{U}_i \sum_{zj} (x)}$$

Where:

$h_e$  = effective release height (m) (All releases from Wolf Creek Generating Station are considered as ground releases therefore  $h_e = 0$ )

$n_{ij}$  = hours of valid data for weather conditions in given direction, windspeed class I, and atmospheric stability class j

$N$  = total hours of valid data

$\bar{U}_i$  = midpoint of windspeed class (m/s)

$x$  = distance downwind (m)

$\sigma_{zj}(x)$  = vertical plume spread without volumetric correction at distance x and stability class j. See Figure B.1

$\Sigma_{zj}(x)$  = vertical plume spread with volumetric correction for release within buildings wake cavity, at distance x and stability class j

For ground level releases  $\Sigma_{zj}(x)$  is the lesser of

$$(\sigma_{zj}^2(x) + 0.5D_z^2/\pi)^{1/2} \quad \text{or} \quad \sqrt{3 \sigma_{zj}(x)}$$

ATTACHMENT A  
(Page 149 of 152)

## OFFSITE DOSE CALCULATION MANUAL

APPENDIX B (cont'd.)

Where:

$D_z$  = maximum adjacent building height either up- or down-wind from the release point

$2.032 = (2/\pi)^{1/2}$  divided by width, in radians, of a 22.5 sector

$(X/Q)_D$  = average effluent concentration, X, normalized to source strength, Q, at distance x in sector D

For WCGS the above Meteorological Model will simplify to the following equation for X/Q:

$$(X/Q)_D = \frac{2.032 \sum_{ij} n_{ij}}{N \bar{U}_i x \sum_{ij} (x)}$$

The calculation of the relative disposition per unit area, D/Q, is performed using the deposition rate graphs found in Regulatory Guide 1.111. For a 22.5 sector, since the effluent concentration is assumed uniform across the sector, the relative deposition per unit area is assumed uniform across the sector.

The calculation of D/Q is determined from relative deposition by the following relationship:

$$D/Q = \frac{\sum_{ij} D_{ij}(x) \cdot DEPL_{ij}(x)}{(2\pi/16)x}$$

Where:

$D_{ij}(x)$  = Relative deposition rate for windspeed class i and stability class j at downwind distance x (1/m). See Figure B.3

$(2\pi/16)x$  = length of arc across sector at downwind distance x (m)

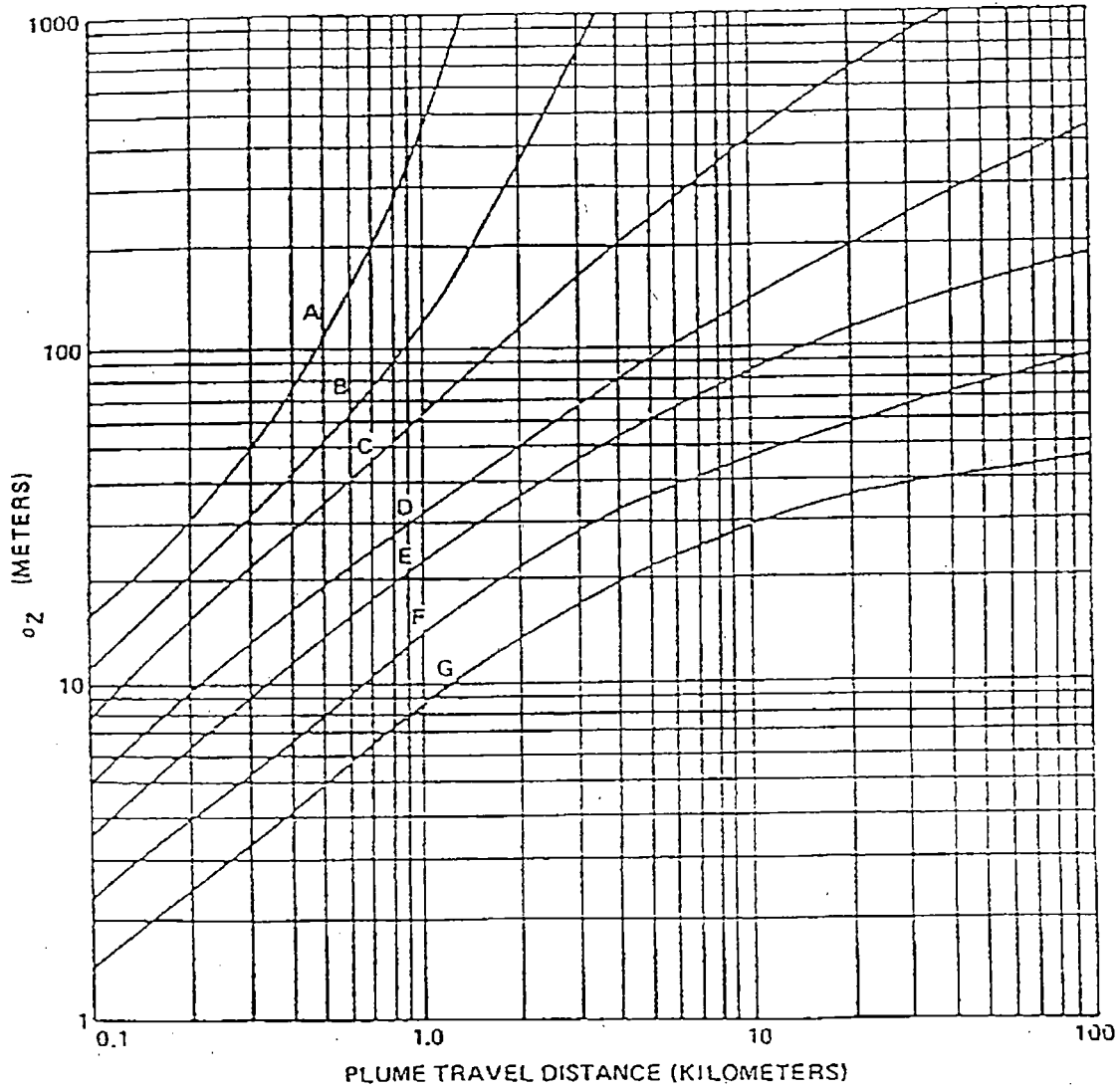
D/Q = relative deposition per unit area (m)

$DEPL_{ij}(x)$  = Reduction factor due to plume depletion at distance x for windspeed i and stability class j

ATTACHMENT A  
(Page 150 of 152)

OFFSITE DOSE CALCULATION MANUAL

Figure B.1



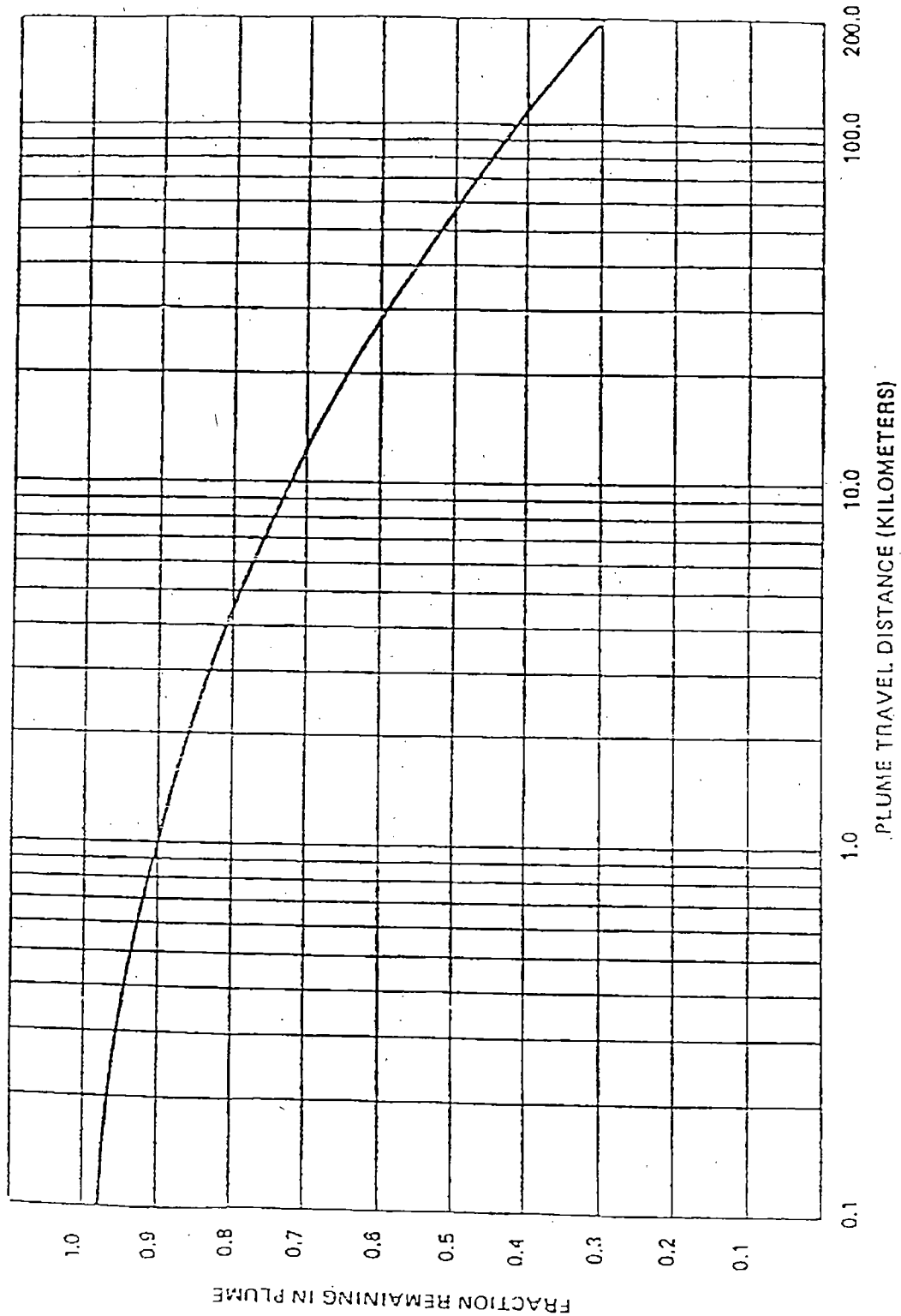
Vertical Standard Deviation of Material in a Plume (Letters denote Pasquill Stability Class)

NOTE: THESE ARE STANDARD RELATIONSHIPS AND MAY HAVE TO BE MODIFIED FOR CERTAIN TYPES OF TERRAIN AND/OR CLIMATIC CONDITIONS (E.G. VALLEY DESERT OVER WATER).

ATTACHMENT A  
(Page 151 of 152)

OFFSITE DOSE CALCULATION MANUAL

Figure B.2



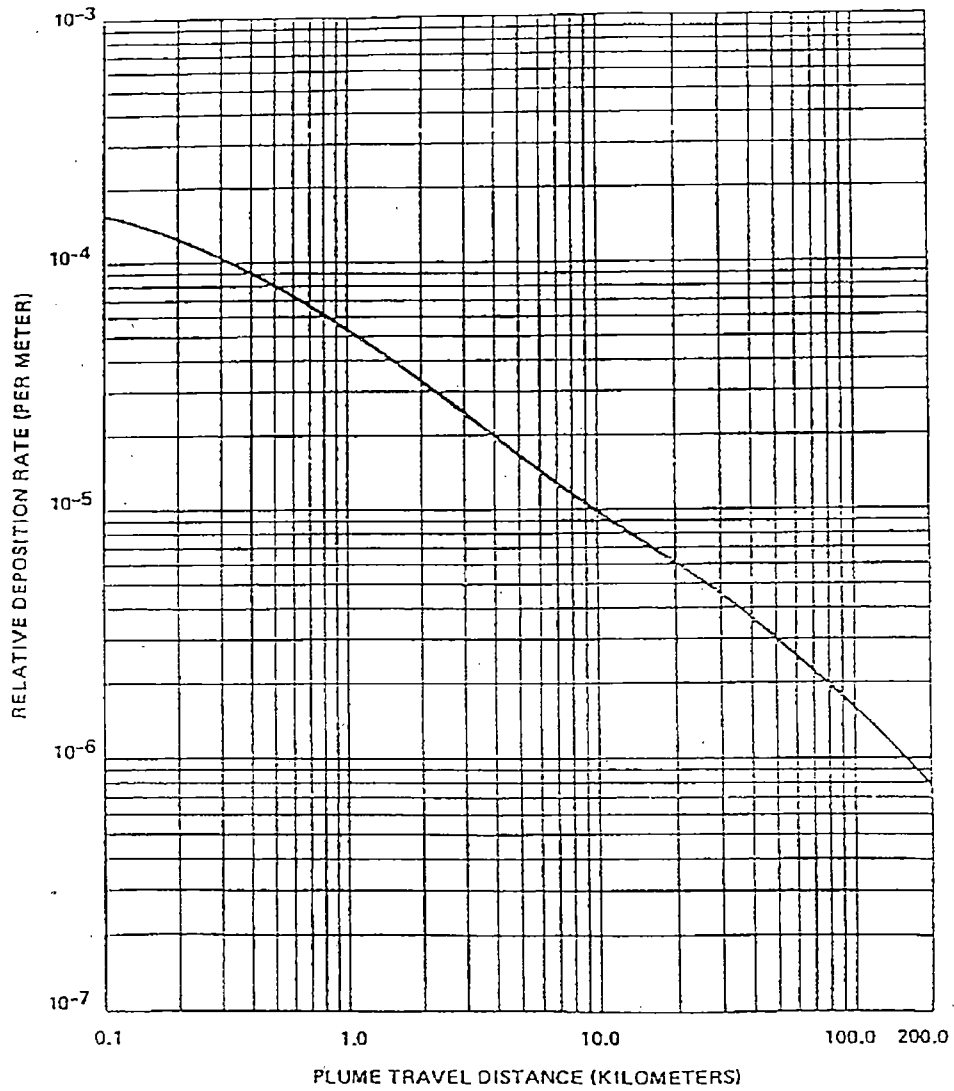
B-5



ATTACHMENT A  
(Page 152 of 152)

OFFSITE DOSE CALCULATION MANUAL

Figure B.3



R-6

-END-

**Wolf Creek Nuclear Operating Corporation  
Procedure, AP 07B-004, Revision 22,  
“Offsite Dose Calculation Manual  
(Radiological Environmental Monitoring Program)”**



AP 07B-004

OFFSITE DOSE CALCULATION MANUAL  
(RADIOLOGICAL ENVIRONMENTAL  
MONITORING PROGRAM)

Responsible Manager

Manager Regulatory Affairs

Revision Number	22
Use Category	Information
Administrative Controls Procedure	Yes
Management Oversight Evolution	No
Program Number	07B

DC24 02/26/2018

## TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1.0	PURPOSE	2
2.0	SCOPE	2
3.0	REFERENCES AND COMMITMENTS	2
4.0	DEFINITIONS	3
5.0	RESPONSIBILITIES	3
6.0	PROCEDURE	5
7.0	RECORDS	6
8.0	FORMS	6
ATTACHMENT A	OFFSITE DOSE CALCULATION MANUAL (REMP)	7
ATTACHMENT B	SPECIAL SCOPE QUALITY ASSURANCE FOR THE REMP	34

Revision: 22	OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)	AP 07B-004
Information Use		Page 2 of 36

## 1.0 PURPOSE

- 1.1 This procedure contains the Offsite Dose Calculation Manual (ODCM) Radiological Environmental Monitoring Program (REMP) requirements.
- 1.2 This procedure also contains the Special Scope Quality Program for the REMP to assure the quality of the results of measurements of radioactive materials in the environment.

## 2.0 SCOPE

- 2.1 Technical Specifications 5.5.1 and 5.6.2 shall be implemented by this procedure.
- 2.2 Procedure AP 07B-003, OFFSITE DOSE CALCULATION MANUAL has been split into two procedures. Requirements for the REMP are now contained in this procedure.
- 2.3 ATTACHMENT B, SPECIAL SCOPE QUALITY ASSURANCE FOR THE REMP, ensures the environmental monitoring requirements of Technical Specification 5.4.1.c are met.
- 2.4 The requirements of the Special Scope Quality Program do not apply to hardware.
- 2.5 For NEI 07-07 [Final] Industry Ground Water Protection Initiative - Final Guidance Document "Communication Protocol" for offsite waters, see AI 07B-004, REPORTING REQUIREMENTS OF THE RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM.
- 2.6 For NEI 07-07 [Final] Industry Ground Water Protection Initiative - Final Guidance Document "Communication Protocol" for onsite waters, see AI 07-007, ONSITE GROUNDWATER PROTECTION PROGRAM MONITORING.
- 2.7 For NEI 07-07 [Final] Industry Ground Water Protection Initiative - Final Guidance Document "Communication Protocol" for leaks/spills, see AP 14B-003, SPILL AND RELEASE REPORTING.

## 3.0 REFERENCES AND COMMITMENTS

### 3.1 References

- 3.1.1 AP 07B-003, OFFSITE DOSE CALCULATION MANUAL
- 3.1.2 Radiological Assessment Branch Technical Position on Environmental Monitoring, Revision 1, November 1979
- 3.1.3 PIR 1998-0112, Revising the ODCM with an OTSC
- 3.1.4 Technical Specification 5.5.1
- 3.1.5 Technical Specification 5.6.2

Revision: 22	OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)	AP 07B-004
Information Use		Page 3 of 36

3.1.6 Regulatory Guide 4.15 - Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment, February 1979

3.1.7 Technical Specification 5.4.1.c

3.1.8 07-00558, NEI 07-07 [Final] Industry Ground Water Protection Initiative - Final Guidance Document

3.1.9 Technical Specification 5.6.3

### **3.2 Commitments**

3.2.1 None

### **4.0 DEFINITIONS**

4.1 None

### **5.0 RESPONSIBILITIES**

#### **5.1 Manager Regulatory Affairs**

5.1.1 Ensures that a quality program has been developed for radiological environmental monitoring.

5.1.2 Ensures that the Offsite Dose Calculation Manual (Radiological Environmental Monitoring Program) has been established, implemented and is maintained in accordance with Technical Specification 5.5.1.

#### **5.2 Manager Quality**

5.2.1 Ensures that internal and external audits are performed and documented.

#### **5.3 Supervisor Regulatory Support**

5.3.1 Implements and maintains the radiological environmental monitoring program.

5.3.2 Ensures procedures are developed and maintained which describe sample collection, sample preparation and sample shipping.

5.3.3 Ensures procedures are developed and maintained which describe equipment maintenance and calibration.

5.3.4 Ensures procedures are developed and maintained which describe data review and reporting requirements.

5.3.5 Ensures personnel have received the required training prior to performing REMP-related activities.

5.3.6 Ensures that problems are identified and are properly addressed for resolution in the corrective action program.

5.4 Environmental Management Personnel

5.4.1 Ensure the REMP is established, implemented, and maintained.

5.4.2 Ensure that Condition Reports are generated for identified problems.

Revision: 22	OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)	AP 07B-004
Information Use		Page 5 of 36

## 6.0 PROCEDURE

### 6.1 Revisions to This Procedure

#### NOTE

To comply with Technical Specification 5.5.1, revisions to this procedure are not permitted via APF 15C-004-04, ON THE SPOT CHANGE form (3.1.3).

- 6.1.1 Revisions to this procedure are to be submitted through the Manager Regulatory Affairs via APF 15C-004-01, DOCUMENT REVISION REQUEST (DRR).
- 6.1.2 Changes to ATTACHMENT A shall include:
1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and (3.1.4)

#### NOTE

Changes to the REMP will have no impact upon the level of radioactive effluent control nor will impact the accuracy or reliability of effluent dose or setpoint calculations.

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations. (3.1.4)
- 6.1.3 The changes shall become effective after the approval of the Plant Manager. (3.1.4)
- 6.1.4 **IF** Figure 5.2 or Figure 5.3 are revised, **THEN** Emergency Planning should be notified so that the Radiological Emergency Response Plan may be revised accordingly.



6.2 ODCM Submittal To NRC**NOTE**

**To comply with Technical Specification 5.5.1, a copy of this procedure must be submitted to the NRC with the Radioactive Effluent Release Report.**

6.2.1 Changes to the ODCM shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented. (3.1.4)

6.2.2 The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted to the NRC prior to May 1. (3.1.9)

**7.0 RECORDS**

7.1 The following is a lifetime QA Record:

7.1.1 AP 07B-004, OFFSITE DOSE CALCULATION MANUAL  
(RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)

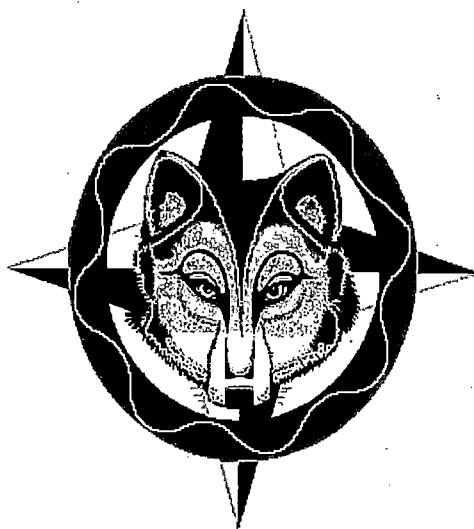
**8.0 FORMS**

8.1 None

ATTACHMENT A  
(Page 1 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

## Wolf Creek Generating Station



Offsite Dose Calculation Manual  
Radiological Environmental Monitoring  
Program

ATTACHMENT A  
(Page 2 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

TABLE OF CONTENTS

	<u>Title</u>	<u>Page</u>
1.0	<b>INTRODUCTION</b>	4
2.0	<b>LIQUID EFFLUENTS (CONTAINED IN AP 07B-003)</b>	-
3.0	<b>GASEOUS EFFLUENTS (CONTAINED IN AP 07B-003)</b>	-
4.0	<b>TOTAL DOSE (CONTAINED IN AP 07B-003)</b>	-
5.0	<b>RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM</b>	
	5.1 Monitoring Program	4
	5.2 Land Use Census	5
	5.3 Interlaboratory Comparison Program	5
	5.4 Reporting Requirements	6
6.0	<b>BASES</b>	
	Sections 2.0 through 4.0 (Contained in AP 07B-003)	-
	Section 5.0 Radiological Environmental Monitoring Program	24
	Section 5.1 Monitoring Program	24
	Section 5.2 Land Use Census	25
	Section 5.3 Interlaboratory Comparison Program	25
7.0	<b>REPORTS</b>	
	7.1 Annual Radiological Environmental Operating Report	26
	7.2 Radioactive Effluent Release Report (Contained in AP 07B-003)	-
APPENDIX A:	Dose Conversion Factor Tables (Contained in AP 07B-003)	-
APPENDIX B:	Meteorological Model (Contained in AP 07B-003)	-

ATTACHMENT A  
(Page 3 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

LIST OF TABLES

<u>Table</u>	<u>Title</u>	<u>Page</u>
5-1	RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM	7
5-2	SAMPLING LOCATION IDENTIFIERS, DISTANCES (MILES) AND DIRECTIONS	13
5-3	DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS	15
5-4	REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES	18

LIST OF FIGURES

<u>Figure</u>	<u>Title</u>	<u>Page</u>
5.1	AIRBORNE PATHWAY SAMPLING LOCATIONS	19
5.2	DIRECT RADIATION PATHWAY SAMPLING LOCATIONS	20
5.3	WATERBORNE PATHWAY SAMPLING LOCATIONS	21
5.4	INGESTION PATHWAY SAMPLING LOCATIONS	22
5.5	DISTANT SAMPLING LOCATIONS	23

ATTACHMENT A  
(Page 4 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**1.0 Introduction**

This attachment contains the ODCM for the Radiological Environmental Monitoring Program which was previously contained in AP 07B-003. This program is provided to monitor the radiation and radionuclides in the environs of the plant. The program provides (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. This program conforms to the guidance of Appendix I to 10 CFR Part 50 and includes the following:

1. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment.
2. A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and the modifications to the monitoring program are made if required by the results of this census, and
3. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

This attachment also provides a description of the information that should be included in the Annual Radiological Environmental Operating Report.

**2.0 Liquid Effluents (Contained in AP 07B-003)****3.0 Gaseous Effluents (Contained in AP 07B-003)****4.0 Total Dose (Contained in AP 07B-003)****5.0 Radiological Environmental Monitoring Program**

This section describes the Radiological Environmental Monitoring Program for Wolf Creek Generating Station.

**5.1 Monitoring Program**

Table 5-1 provides a schedule which describes the pathways, specific locations, sample collection frequencies, and analyses to be performed to implement the Radiological Environmental Monitoring Program.

ATTACHMENT A  
(Page 5 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

Figures 5.1 through 5.5 contain maps depicting sampling locations in relation to the WCGS site. Table 5-2 lists distances and directions to these locations from the WCGS site.

Table 5-3 lists required detection capabilities for the analyses performed.

**5.2 Land Use Census**

A Land Use Census shall be conducted annually during the growing season to identify the nearest (1) milk animal, (2) residence, and (3) garden of greater than 500 square feet producing broadleaf vegetation in each of the 16 meteorological sections within five miles of the WCGS site. (Broadleaf vegetation sampling of available vegetation may be performed at the site boundary in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broadleaf vegetation sampling in Table 5-1 shall be followed, including analysis of control samples.) Methods shall be used in conducting the census that provide the best results, such as door-to-door surveys, telephone surveys, mailed surveys, drive-by surveys, consulting the U.S.D.A. office in Burlington, consulting with Coffey County Emergency Management, inspection of aerial photographs of the area, or reviewing leasing records for area farms and residences.

If a location(s) is identified which yields a calculated dose or dose commitment (via the same exposure pathway) 20% greater than at a location from which samples are currently being obtained, and the cooperator agrees, the new location(s) shall be added to the Radiological Environmental Monitoring Program. The indicator sampling location(s) having the lowest calculated dose or dose commitment may then be deleted from the monitoring program.

The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report described in Section 7.1.

**5.3 Interlaboratory Comparison Program**

The analysis laboratory contracted to analyze samples from the Radiological Environmental Monitoring Program participates in a Laboratory Intercomparison Program.

A summary of intercomparison results shall be included in the Annual Radiological Environmental Operating Report described in Section 7.1.

ATTACHMENT A  
(Page 6 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**5.4 Reporting Requirements****5.4.1 Annual Radiological Environmental Operating Report**

To meet the requirements of Wolf Creek Technical Specification 5.6.2, the Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted to the NRC before May 1 of each year. The content of this report is described in Section 7.1.

**5.4.2 Special Reports**

A special report shall be prepared and submitted to the NRC within 30 days if levels of radioactivity as a result of plant effluents detected in an environmental medium at a specified location exceed the reporting levels of Table 5-4 when averaged over any calendar quarter. The special report shall identify the cause(s) for exceeding the limit(s) and define the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose\* to a member of the public is less than the calendar year limits of Wolf Creek Technical Specification 5.5.4. When one or more of the radionuclides in Table 5-4 is detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 5-4 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose\* to a member of the public from all radionuclides is equal to or greater than the calendar year limits of Technical Specification 5.5.4. (\*The methodology and parameters used to estimate the potential annual dose to a member of the public shall be indicated in this report.)

ATTACHMENT A  
(Page 7 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

TABLE 5-1

## RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>Exposure Pathway/ Sample Type</u>	<u>Number of Samples and Sample Locations (1)</u>	<u>Sample Collection Frequency</u>	<u>Type and Frequency of Analysis</u>
1. AIRBORNE	FIGURES 5.1 & 5.5		
Radioiodine and Particulates	<p>Samples from six locations</p> <p>Samples from locations near the site boundary in three sectors having the highest calculated annual average D/Q and one supplemental location (Locations 2, 18, 37, or 49 on Figure 5.1);</p> <p>Sample from the vicinity of a community having the highest calculated annual average D/Q (Location 32 on Figure 5.1, New Strawn);</p> <p>Sample from a control location 9.5 to 18.5 miles distant in a low ranked D/Q sector (Location 53 on Figure 5.5). (11)</p>	<p>Continuous sampler operation with sample collection weekly, or more frequently if required, by dust loading</p>	<p>Analyze radioiodine canister weekly for I-131</p> <p>Analyze particulate filter weekly for gross beta activity (2); perform quarterly gamma isotopic analysis (3) composite (by location).</p>
2. DIRECT RADIATION (4)	FIGURES 5.2 AND 5.5		
	<p>39 routine monitoring stations with two or more dosimeters measuring dose continuously, placed as follows:</p> <p>An inner ring of stations, one in each meteorological sector 0-3 mile range from the site (Locations 1, 7, 9, 11-13, 18, 26, 27, 29, 30, 37, 38, 46, &amp; 49 on Figure 5.2).</p>	Quarterly	Gamma dose quarterly



ATTACHMENT A  
(Page 8 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-1 (Continued)**  
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>Exposure Pathway/ Sample Type</u>	<u>Number of Samples and Sample Locations (1)</u>	<u>Sample Collection Frequency</u>	<u>Type and Frequency of Analysis</u>
DIRECT RADIATION (4) (CONTINUED)	<p>An outer ring of stations, one in each meteorological sector in the 3 to 5 mile range from the site (Locations 4, 5, 15-17, 19, 22-25, 32, 34-36, 50 &amp; 51 on Figure 5.2). Four sectors [A, B, G &amp; J] contain an additional station (Locations 2, 8, 14 &amp; 20)</p> <p>The balance of the stations to be placed in special interest areas such as population centers (Locations 23, 32 &amp; 52), nearby residences (many locations are near a residence), schools (Locations 23 &amp; 52), Wilson Cadman Wildlife Education Area (44), CCL Public Fishing Area (46) and in two areas to serve as control stations 10-20 miles distant from the site (Locations 39 and 53 on Figure 5.5) (11)</p>		
3. WATERBORNE	FIGURE 5.3		
Surface	One sample upstream (5) (Location JRR on Figure 5.3) and one sample downstream (Location SP on Figure 5.3)	Monthly grab sample	Monthly gamma isotopic analysis (3) and composite for tritium analysis quarterly.
Ground	Samples from one or two sources only if likely to be affected	Quarterly grab sample	Quarterly gamma isotopic analysis (3) and tritium analysis.
	Indicator samples at locations hydrologically down-gradient of the site (Locations C-10, C-49, F-1, G-2, J-1 and J-2 on Figure 5.3); control sample at a location hydrologically upgradient of the site (Location B-12 on Figure 5.3) (6)		

ATTACHMENT A  
(Page 9 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-1 (Continued)**  
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>Exposure Pathway/ Sample Type</u>	<u>Number of Samples and Sample Locations (1)</u>	<u>Sample Collection Frequency</u>	<u>Type and Frequency of Analysis</u>
3. WATERBORNE (CONT.) Drinking	Sample of municipal water supply at an indicator location downstream of the Neosho River-Wolf Creek confluence (Location IO-DW on Figure 5.5); control sample from location upstream of the Neosho River-Wolf Creek confluence (Location BW-15 on Figure 5.3)	Monthly composite (7)	Monthly gamma isotopic analysis (3) and gross beta analysis of composite sample. Quarterly tritium analysis of composites (8).
Shoreline Sediment	One sample from the vicinity of Coffey County Lake discharge cove (Location DC on Figure 5.3); control sample from John Redmond Reservoir (Location JRR on Figure 5.3).	Semiannually	Semiannual gamma isotopic analysis (3)
4. INGESTION	FIGURES 5.4 AND 5.5		
Milk	Samples from milking animals at three indicator locations within 5 miles of the site having the highest dose potential (currently there are no locations producing milk for human consumption within 5 miles of the site); one sample from a control location greater than 10 miles from the site if indicator locations are sampled. (11)	Semimonthly April to November; monthly December-March (9)	Gamma isotopic analysis (3) and I-131 analysis of each sample.
Fish	Indicator samples of 1 to 3 recreationally important species from Coffey County Lake (Figure 5.4); control samples of similar species from John Redmond Reservoir Spillway (indicated on Figure 5.4).	Semiannually	Gamma isotopic analysis (3) on edible portions

ATTACHMENT A  
(Page 10 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-1 (Continued)**  
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>Exposure Pathway/ Sample Type</u>	<u>Number of Samples and Sample Locations (1)</u>	<u>Sample Collection Frequency</u>	<u>Type and Frequency of Analysis</u>
4. INGESTION (CONT.) Food Products	Samples of available broadleaf vegetation from two indicator locations (using the criteria from the "Land Use Census" section) with highest calculated annual average D/Q (Locations A-3 and Q-6 and alternate Locations B-1, H-2, N-1 and R-2 on Figure 5.4); sample of similar broadleaf vegetation from a control location 9.5 to 18.5 miles distant in a low ranked D/Q sector (Location D-2 on Figure 5.5). (11)	Monthly when available (9)	Gamma isotopic analysis (3) on edible portions.
Food Products	Sample of crops irrigated with water from the Neosho River downstream of the Neosho River-Wolf Creek confluence (locations will vary from year to year, e.g., Location NR-D1 & NR-D2 on Figure 5.5).	At time of harvest (10)	Gamma isotopic analysis (3) on edible portions

ATTACHMENT A  
(Page 11 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-1 (Continued)**

## TABLE NOTATIONS

- (1) Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment, and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report described in Section 7.1.

It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances, suitable specific alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made.

- (2) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more, preferably after 72 hours, after sampling to allow for Rn-220 and Rn-222 daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.
- (3) Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.
- (4) One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. The 40 stations are not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations, e.g., some sectors are over water so that the number of dosimeters may be reduced accordingly. Sector J is an example. The frequency or analysis or readout for the dosimeter system depends upon the characteristics of the specific system used and is selected to obtain optimum dose information with minimal fading.

ATTACHMENT A  
(Page 12 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-1 (Continued)**

## TABLE NOTATIONS

- (5) The "upstream" sample is taken at a distance beyond significant influence of the discharge.
- (6) Ground water samples shall be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination.
- (7) A composite sample is one in which the quantity (aliquot) of liquid sampled is consistent over the sampling period and in which the method of sampling employed results in a specimen that is representative of the liquid concentrate. In this program, composite sample aliquots shall be collected at time intervals that are very short (e.g., every two hours) relative to the compositing period (e.g., monthly) in order to assure obtaining a representative sample.
- (8) If the dose calculated for consumption of water (using ODCM methodology and parameters) exceeds one millirem per year, composite sampling at the indicator location shall be performed every two weeks and I-131 analysis shall be performed on the composite samples.
- (9) Milk and broadleaf vegetation samples are often temporarily, but not permanently, unavailable at the scheduled sample collection times. Alternate sampling locations may therefore be listed in the Table and used at these times to provide continued monitoring of these pathways. If samples are considered permanently unavailable at a location, another location will be selected (if available) as described in Note (1).
- (10) If harvest occurs more than once a year, sampling shall be performed during each discrete harvest. If harvest occurs continuously, sampling shall be monthly. Attention shall be paid to including samples of tuberous and root food products.
- (11) The purpose of this sample is to obtain background information. If it is not practical to establish control locations in accordance with the distance and wind direction criteria, other sites that provide valid background data may be substituted.

ATTACHMENT A  
(Page 13 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-2**

SAMPLING LOCATION IDENTIFIERS, DISTANCES (miles) AND DIRECTIONS

Sample Type	Location Identifier	Distance from Reactor	Direction	Sector
Air Particulates and Radioiodine	2	2.7	N	A
	18	3.0	SSE	H
	32	3.1	WNW	P
	37	2.0	NNW	R
	49	0.8	NNE	B
	53	10.8	ENE	D
Dosimeters	1	1.4	N	A
	2	2.7	N	A
	4	4.0	NNE	B
	5	4.1	NE	C
	7	2.1	NE	C
	8	1.7	NNE	B
	9	2.0	ENE	D
	11	1.7	E	E
	12	1.9	ESE	F
	13	1.6	SE	G
	14	2.5	SE	G
	15	4.6	ESE	F
	16	4.3	E	E
	17	3.7	SE	G
	18	3.0	SSE	H
	19	3.9	SSE	H
	20	3.3	S	J
	22	3.9	SSW	K
	23	4.3	SW	L
	24	4.1	WSW	M
	25	3.4	W	N
	26	2.4	WSW	M
	27	2.2	SW	L
	29	2.7	SSW	K
	30	2.5	W	N
	32	3.1	WNW	P
34	4.4	NW	Q	
35	4.6	NNW	R	
36	4.2	N	A	
37	2.0	NNW	R	
38	1.2	NW	Q	
39	13.1	N	A	
44	3.0	NNW	R	
46	1.6	WNW	P	

ATTACHMENT A  
(Page 14 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-2 (Cont.)**

SAMPLING LOCATION IDENTIFIERS, DISTANCES (miles) AND DIRECTIONS

Sample Type	Location Identifier	Distance from Reactor	Direction	Sector
<i>Dosimeters</i>	49	0.8	NNE	B
	50	3.6	ENE	D
	51	4.3	S	J
	52	3.6	SW	L
	53	10.8	ENE	D
<i>Surface Water</i>	JRR	3.7	W	N
	SP	3.2	SSE	H
<i>Ground Water</i>	B-12	1.9	NNE	B
	C-10	2.7	W	N
	C-49	2.8	SW	L
	F-1	2.5	ESE	F
	G-2	3.6	SE	G
	J-1	3.8	S	J
	J-2	4.3	S	J
<i>Drinking Water</i>	BW-15	3.9	SW	L
	IO-DW	26.1	SSE	H
<i>Shoreline Sediment</i>	DC	0.8	WNW	P
	JRR	3.6	W	N
<i>Fish</i>	CCL	0.6	E to NNW	E to R
	JRR	3.7	W	N
<i>Food/Garden</i>	A-3	2.6	N	A
	B-1	0.8	NNE	B
	D-2	14.8	ENE	D
	H-2	3.0	SSE	H
	N-1	2.4	W	N
	Q-6	2.4	NW	Q
	R-2	2.0	NNW	R
<i>Crops</i>	NR-D1	8.9	S	J
	NR-D2	11.5	S	J

ATTACHMENT A  
(Page 15 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-3**

DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS <sup>(1)</sup>  
Lower Limit of Detection (LLD) <sup>(2)</sup>

ANALYSIS	WATER (pCi/l)	AIRBORNE PARTICULATE OR GASES (pCi/m <sup>3</sup> )	FISH (pCi/kg, wet)	MILK (pCi/l)	FOOD PRODUCTS (pCi/kg, wet)	SEDIMENT (pCi/kg, dry)
Gross Beta	4*	0.01				
H-3	2,000**					
Mn-54	15		130			
Co-58	15		130			
Fe-59	30		260			
Co-60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131	1***	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		

\* LLD for drinking water samples.

\*\* LLD for drinking water and ground water samples. For surface water samples, a value of 3,000 pCi/l may be used.

\*\*\*LLD for drinking water and ground water samples. For surface water samples, a value of 15 pCi/l may be used.



ATTACHMENT A  
(Page 16 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-3 (Continued)**

## TABLE NOTATIONS

- (1) This list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report described in Section 7.1.
- (2) The LLD is defined, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

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

$$LLD = \frac{4.66 s_b}{E \cdot V \cdot 2.22 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

- LLD = the "a priori" lower limit of detection (picoCuries per unit mass or volume),
- $S_b$  = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),
- E = the counting efficiency (counts per disintegration),
- V = the sample size (units of mass or volume),
- 2.22 = the number of disintegrations per minute per picoCurie,
- Y = the fractional radiochemical yield, when applicable,
- $\lambda$  = the radioactive decay constant for the particular radionuclide ( $\text{sec}^{-1}$ ), and
- $\Delta t$  = the elapsed time between sample collection, or end of the sample collection period, and time of counting (sec).

Typical values of E, V, Y, and  $\Delta t$  should be used in the calculation.

ATTACHMENT A  
(Page 17 of 27)

## OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-3 (Continued)**

## TABLE NOTATIONS

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement. Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report described in Section 7.1.

ATTACHMENT A  
(Page 18 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

**TABLE 5-4**  
REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL  
SAMPLES

ANALYSIS	WATER (pCi/l)	AIRBORNE		MILK (pCi/l)	FOOD PRODUCTS (pCi/kg, wet)
		PARTICULATE OR GASES (pCi/m <sup>3</sup> )	FISH (pCi/kg, wet)		
H-3	20,000*				
Mn-54	1,000		30,000		
Co-58	1,000		30,000		
Fe-59	400		10,000		
Co-60	300		10,000		
Zn-65	300		20,000		
Zr-Nb-95	400				
I-131	2**	0.9		3	100
Cs-134	30	10	1,000	60	1,000
Cs-137	50	20	2,000	70	2,000
Ba-La-140	200			300	

\* For drinking water and ground water samples. This is 40 CFR Part 141 value. For surface water samples, a value of 30,000 pCi/l may be used.

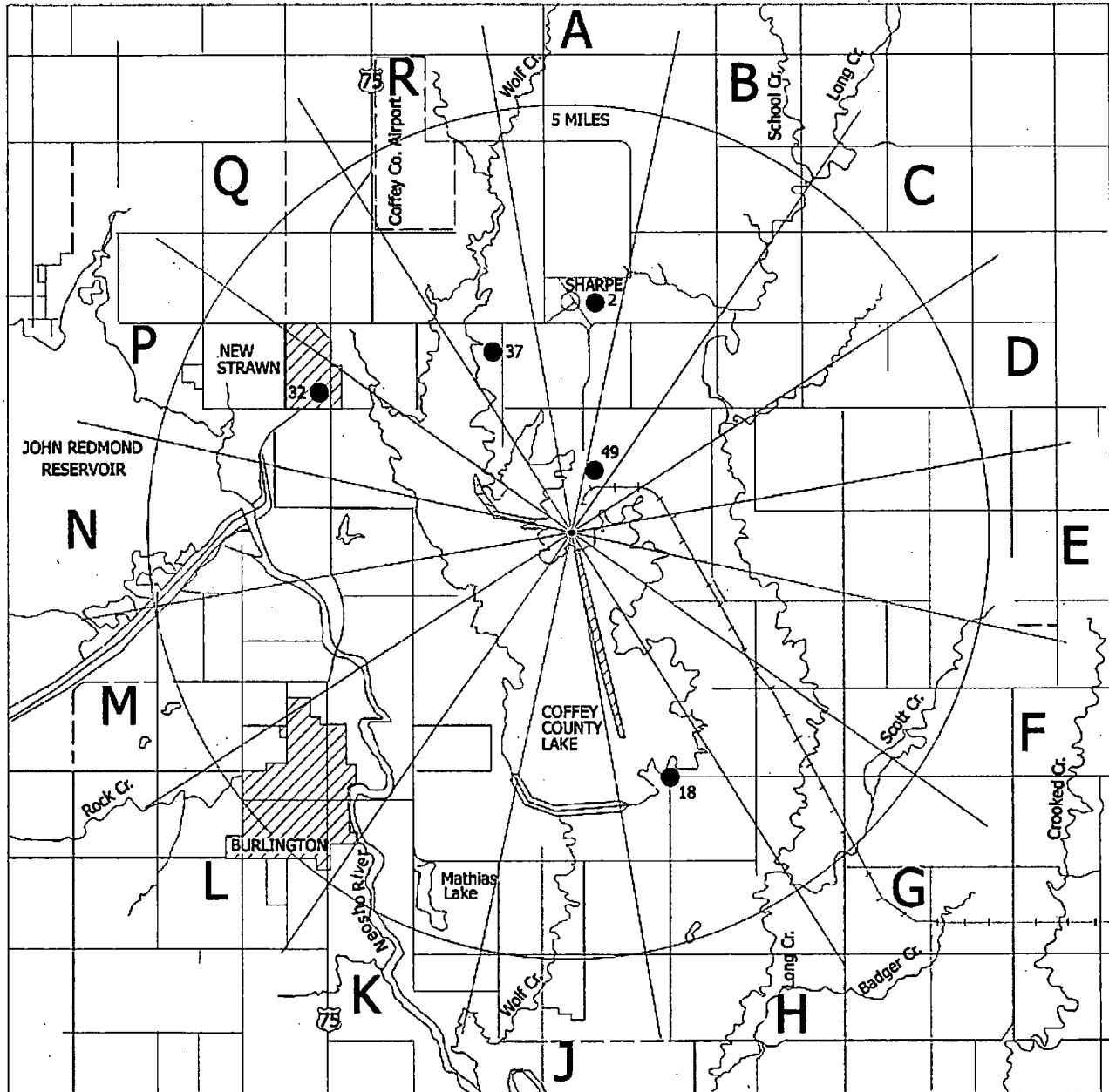
\*\* For drinking water and ground water samples. For surface water samples, a value of 20 pCi/l may be used.

IF ground water or surface water results exceed the Reporting Levels, THEN proceed to AI 07B-004, REPORTING REQUIREMENTS OF THE RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM for specific details regarding NEI 07-07 [Final] Industry Ground Water Protection Initiative - Final Guidance Document "Communication Protocol" requirements.

ATTACHMENT A  
(Page 19 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

FIGURE 5.1



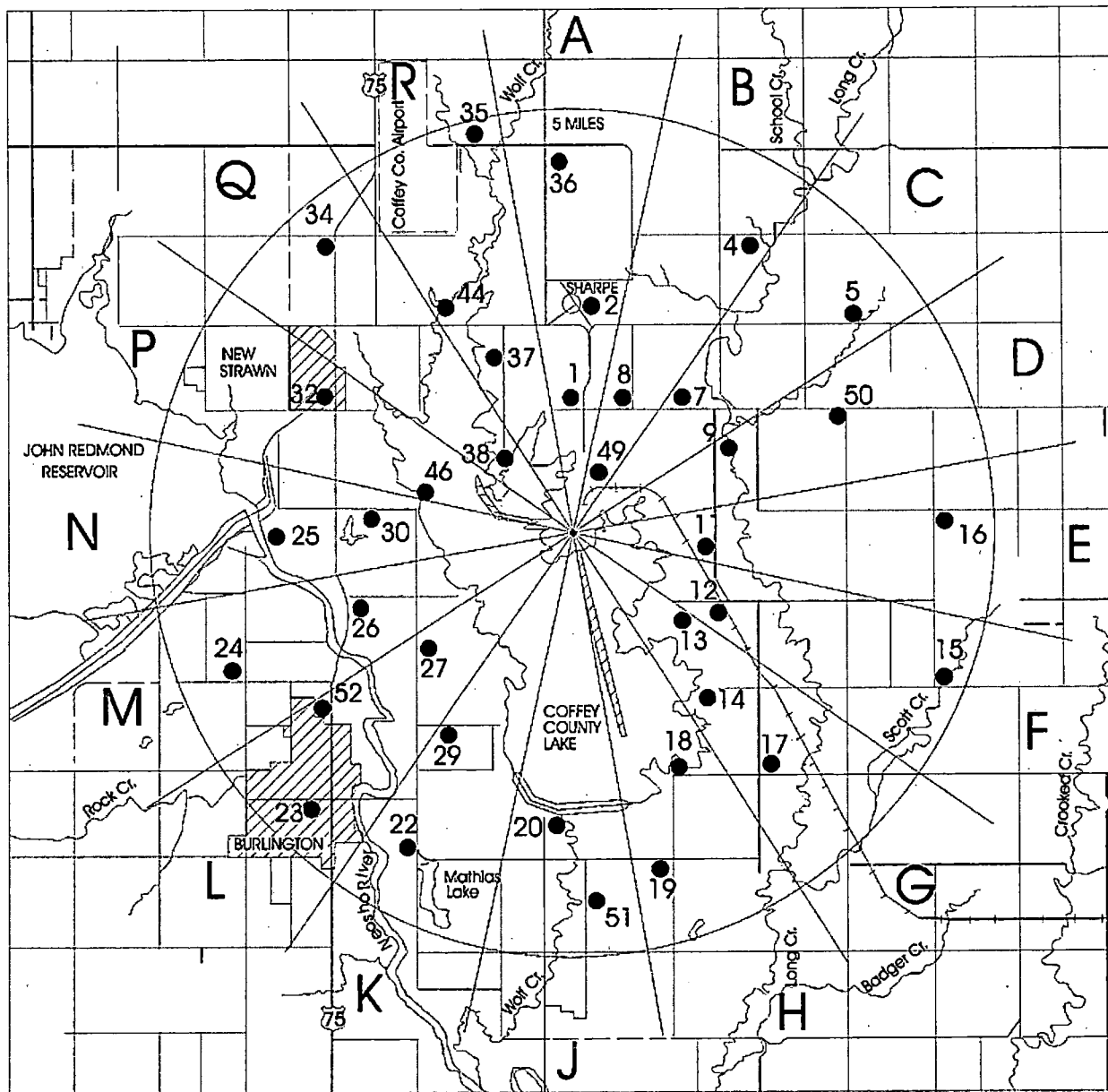
**AIRBORNE PATHWAY SAMPLING LOCATIONS**

● = AIRBORNE PARTICULATE AND RADIOIODINE

ATTACHMENT A  
(Page 20 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

FIGURE 5.2



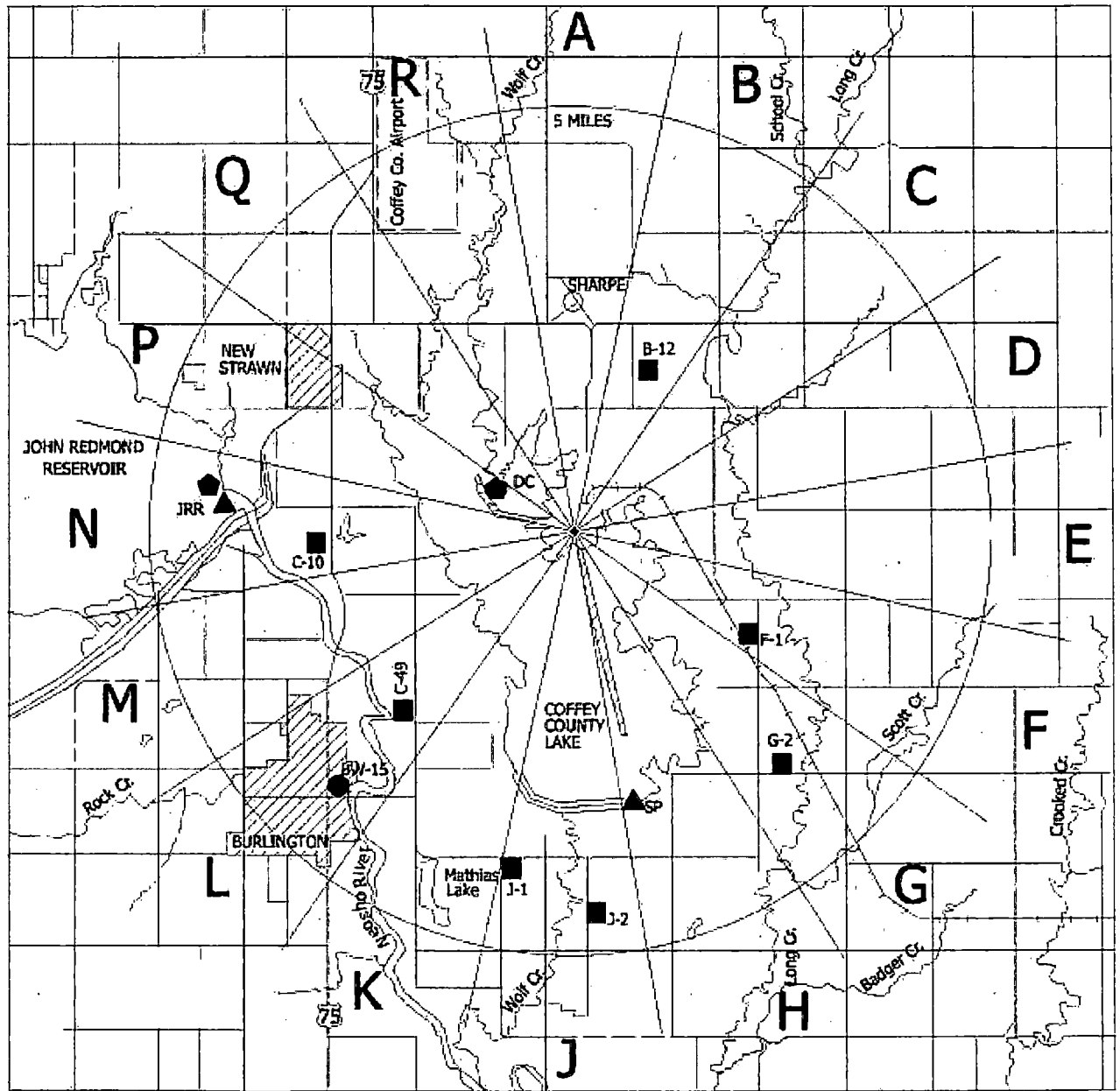
DIRECT RADIATION PATHWAY SAMPLING LOCATIONS

● = DOSIMETER LOCATIONS

ATTACHMENT A  
(Page 21 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

FIGURE 5.3



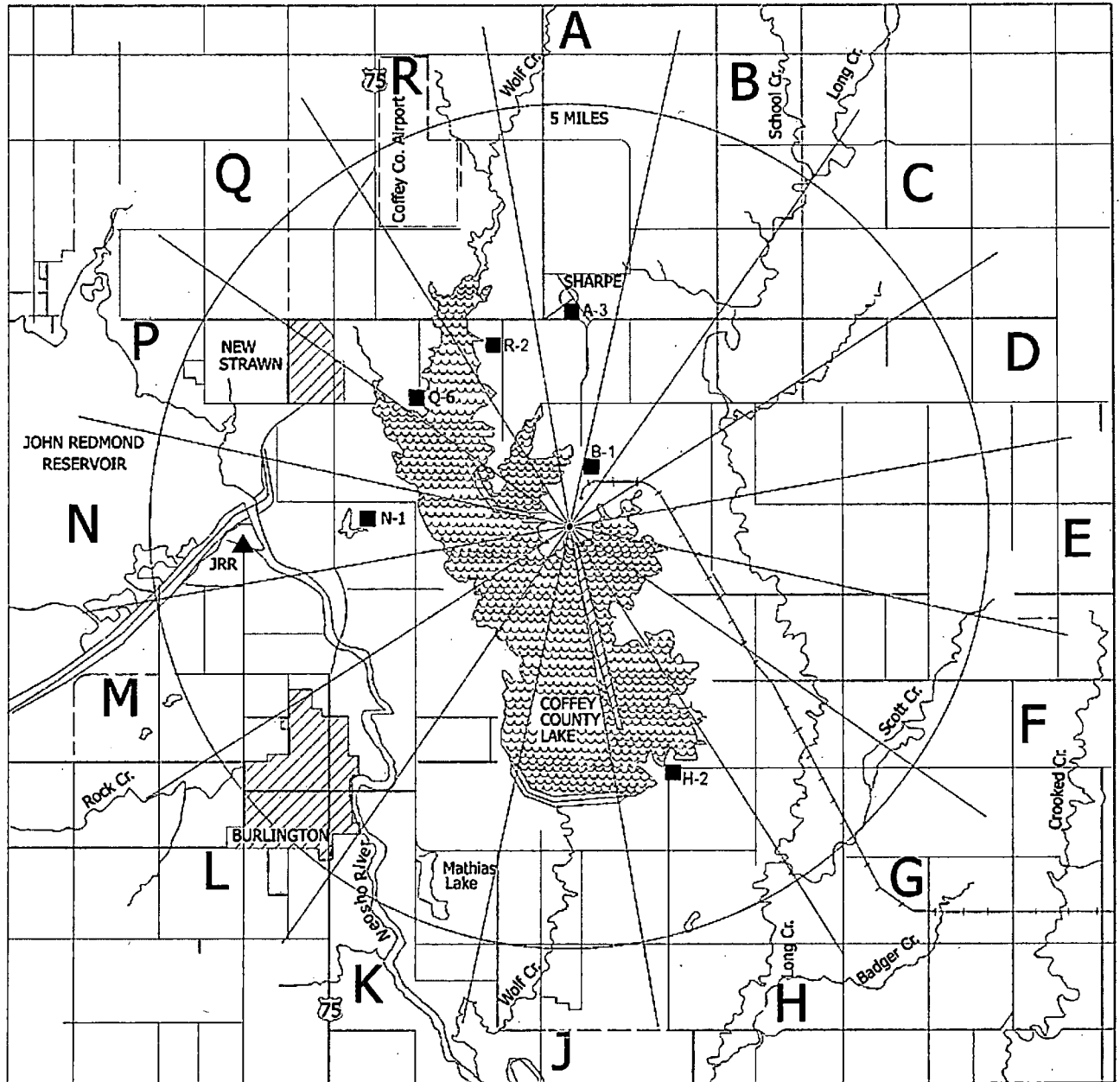
**WATERBORNE PATHWAY SAMPLING LOCATIONS**

- = DRINKING WATER
- ▲ = SURFACE WATER
- = GROUND WATER
- ◆ = SHORELINE SEDIMENT

ATTACHMENT A  
(Page 22 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

FIGURE 5.4



INGESTION PATHWAY SAMPLING LOCATIONS

▲ = FISH (JRR)

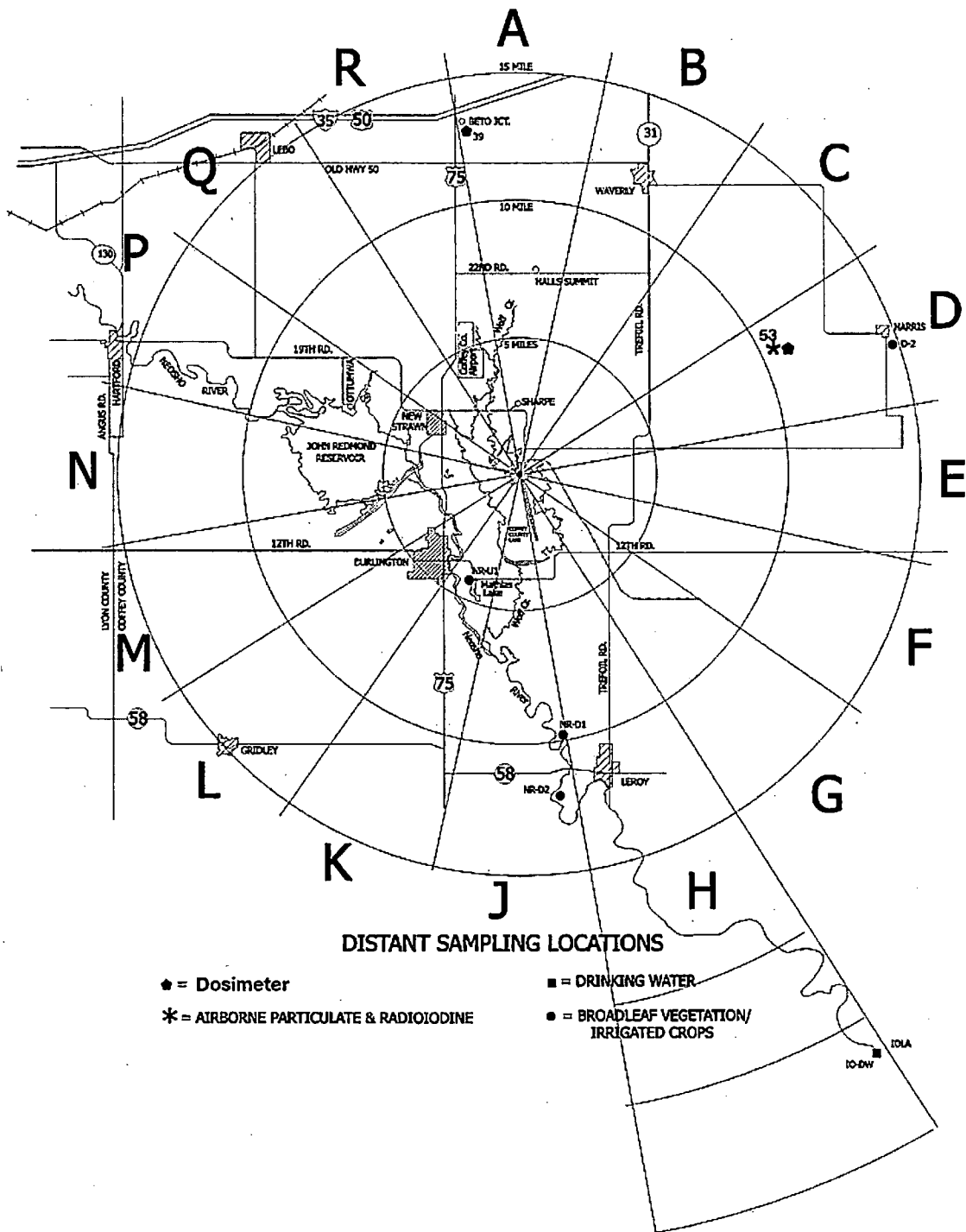
■ = BROADLEAF VEGETATION

☞ = FISH (CCL)

ATTACHMENT A  
(Page 23 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

FIGURE 5.5



DISTANT SAMPLING LOCATIONS

- ◆ = Dosimeter
- \* = AIRBORNE PARTICULATE & RADIOIODINE
- = DRINKING WATER
- = BROADLEAF VEGETATION/IRRIGATED CROPS



Revision: 22	OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)	AP 07B-004
Information Use		Page 30 of 36

ATTACHMENT A  
(Page 24 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

**6.0 Bases**

The bases contained on the succeeding pages summarize the general requirements of Section 5.0 of the ODCM (REMP).

**Section 2.0 Liquid Effluents (Contained in AP 07B-003)**

**Section 3.0 Gaseous Effluents (Contained in AP 07B-003)**

**Section 4.0 Total Dose (Contained in AP 07B-003)**

**Section 5.0 Radiological Environmental Monitoring Program**

**Section 5.1 Monitoring Program**

The Radiological Environmental Monitoring Program provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation. This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the Radiological Effluent Monitoring Program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. Guidance for this monitoring program is provided by the Radiological Assessment Branch Technical Position on Environmental Monitoring, Revision 1, November 1979.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination-Application to Radiochemistry," Anal. Chem. 40, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

Revision: 22	OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)	AP 07B-004
Information Use		Page 31 of 36

ATTACHMENT A  
(Page 25 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

**Section 5.2 Land Use Census**

This section is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census. Information that will provide the best results, such as door-to-door survey, aerial survey, or consulting with local agricultural authorities, shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50.

Restricting the census to gardens of greater than 50 m<sup>2</sup> provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assume in Regulatory Guide 1.109 for consumption by a child.

To determine this minimum garden size, the following assumptions were made: (1) 20% of the garden was used for growing broadleaf vegetation (i.e., similar to lettuce and cabbage), and (2) a vegetation yield of 2 kg/m<sup>2</sup>.

**Section 5.3 Interlaboratory Comparison Program**

The requirement for participation in an approved Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

Revision: 22	OFFSITE DOSE CALCULATION MANUAL (RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM)	AP 07B-004
Information Use		Page 32 of 36

ATTACHMENT A  
(Page 26 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

7.0 Reports

7.1 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3 and IV.C of Appendix I to 10 CFR Part 50 (3.1.5), including a comparison with preoperational studies, with operational controls and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The report shall also include the results of the Land Use Census described in Section 5.2.

The Annual Radiological Environmental Operating Report shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in Table 5-1 as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The report shall also include the following: a summary description of the Radiological Environmental Monitoring Program; legible maps covering all sampling locations keyed to a table giving distances and directions from the centerline of the reactor; the results of licensee participation in the Interlaboratory Comparison Program and the corrective actions being taken if the specified program is not being performed as required by Section 5.3; reasons for not conducting the Radiological Environmental Program as required by Section 5.1 with plans for preventing a recurrence and discussion of all deviations from the sampling schedule of Table 5-1; discussion of environmental sample measurements that exceed the reporting levels of Table 5-4 but are not the result of plant effluents, and discussions of all analyses in which the LLD required by Table 5-3 was not achieved.

7.2 Radioactive Effluent Release Report (Contained in AP 07B-003)

Revision: 22

OFFSITE DOSE CALCULATION MANUAL  
(RADIOLOGICAL ENVIRONMENTAL  
MONITORING PROGRAM)

AP 07B-004

Information Use

Page 33 of 36

ATTACHMENT A  
(Page 27 of 27)

OFFSITE DOSE CALCULATION MANUAL (REMP)

**APPENDIX A Dose Conversion Factor Tables (Contained in AP 07B-003)**

**APPENDIX B Meteorological Model (Contained in AP 07B-003)**

-END-

ATTACHMENT B  
(Page 1 of 3)

## SPECIAL SCOPE QUALITY ASSURANCE FOR THE REMP

B.1 **QUALITY REQUIREMENTS**

## B.1.1 Review and Reporting of Data

1. Data from sample analysis are reviewed in accordance with approved procedures.

## B.1.2 Organization

1. Section 5 of this procedure identifies the organizational structure, management positions and responsibilities.

## B.1.3 Personnel Qualifications

1. Personnel responsible for collection and preparation of radiological environmental monitoring samples shall be qualified in accordance with approved procedures.
2. Personnel responsible for digital flow meter calibration verifications shall be qualified in accordance with approved procedures.

## B.1.4 Procurement Document Control

1. Purchase orders for contracted radiological analysis services, contracted calibrator calibration services, or contracted dosimeter services shall:
  - a. Include quality requirements
  - b. Specify technical requirements
  - c. Identify documentation requirements
  - d. Detail records requirements
  - e. Extend applicable procurement document requirements to lower tier suppliers; and
  - f. Specifying special requirements such as reporting program deficiencies, documentation requirements and applicable acceptance criteria.
2. Purchase orders for contracted radiological analysis services shall require participation in an interlaboratory comparison program.

ATTACHMENT B  
(Page 2 of 3)

## SPECIAL SCOPE QUALITY ASSURANCE FOR THE REMP

## B.1.5 Instructions, Procedures and Drawings

1. This criterion applies to:
  - a. Surveillances, test and calibrations,
  - b. Environmental sampling, and
  - c. Data processing and evaluation
2. Activities shall be accomplished using procedures, instructions and drawings approved prior to use.
3. Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

## B.1.6 Control of Purchased Radiological Analysis services, Calibrator Calibration services, or Dosimeter services

1. Controls shall be established to ensure that purchased services conform to procurement document requirements.
2. Controls shall include evaluation and selection of suppliers and surveillance or audit of supplied services.

## B.1.7 Control of Measuring and Test Equipment

1. Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits.

## B.1.8 Inspection, Test and Operating Status for Purchased Calibrator Calibration Services

1. These inspections and tests shall be completed in accordance with approved procedures.

## B.1.9 Quality Assurance Records

1. All documentation shall be legible, reproducible and or microfilmable quality.
2. Documented records shall be maintained to show objective evidence of quality.
3. Quality records shall not be destroyed or disposed of without written authorization.

ATTACHMENT B  
(Page 3 of 3)

## SPECIAL SCOPE QUALITY ASSURANCE FOR THE REMP

4. For the vendor laboratory that performs Radiological Analysis for the REMP, data sheets and finished records shall be retained by the contactor for a period of five years.

## B.1.10 Audits

1. Audits shall be performed in accordance with AP 20A-003, QA AUDIT REQUIREMENTS, FREQUENCIES, AND SCHEDULING, to verify compliance to requirements and to verify the effectiveness of the implemented activities affecting quality.
2. Triennial audits in accordance with AP 24C-008, SUPPLIER AUDITS AND COMMERCIAL GRADE SURVEYS, shall be performed.

-END-

**Wolf Creek Nuclear Operating Corporation  
Procedure, AP 31A-100, Revisions 8 and 9,  
“Solid Radwaste Process Control Program”**





AP 31A-100

**SOLID RADWASTE PROCESS CONTROL PROGRAM**

Responsible Manager

Manager: Radiation Protection

Revision Number	8
Use Category	Information
Administrative Controls Procedure	Yes
Management Oversight Evolution	No
Program Number	25A

DC38 8/30/2011

## TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1.0	PURPOSE	2
2.0	SCOPE	2
3.0	REFERENCES AND COMMITMENTS	6
4.0	DEFINITIONS	8
5.0	RESPONSIBILITIES	13
6.0	PROCEDURE	14
7.0	RECORDS	33
8.0	FORMS	33
ATTACHMENT A	TECHNICAL REQUIREMENTS (SECTION 5.5.4)	34

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 2 of 34

## 1.0 PURPOSE

1.1 This procedure provides instructional guidance and a description of the solid waste Process Control Program (PCP). The PCP describes the methods used for processing wet low-level radioactive waste into a waste form acceptable for disposal, in accordance with 10 CFR 61 requirements, at a licensed land disposal facility.

## 2.0 SCOPE

2.1 This procedure describes current and planned practice for sampling, sample evaluation, classification, processing and packaging of radioactive material. This procedure does not address irradiated hardware which will be managed on a case-by-case basis under the direction of the Manager Radiation Protection. System descriptions and operating practices are described in the following steps.

2.2 Waste Stream Identification - The station had initially identified eight different waste streams and treats each separately for classification purposes. The identification listing may be consolidated, expanded and streams deleted at the discretion of radwaste management without revising the PCP.

### EXAMPLES

For Information Only

- o Dry Active Waste (DAW)
- o Tubular Ultra Filtration/Reverse Osmosis Process Waste
- o Steam Generator Blowdown Bead Resin
- o Chemical and Volume Control System Bead Resin (1) (CVCS)
- o Reactor Coolant System Filters
- o Ultra Filtration Skid Waste
- o Spent Fuel Pool Filters
- o Radwaste Resins
- o Steam Generator Blowdown Filters (2)

(1) May contain combination of CVCS, Diversified, and Spent Fuel Pool Resins

(2) May be disassembled and components handled as DAW

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 3 of 34

2.3 Non-Waste Stream Identification - The station has identified two different sources and treats each separately for classification purposes.

- o Non-irradiated material removed from the Spent Fuel Pool.
- o Any other radioactive material generated by the station.

2.4 Disposition of Radioactive Material Sent to a Vendor for Intermediate Processing - Practices include sending radioactive material packages generated by the station to Energy Solutions, Studsvik or other vendors for volume reduction (VR)/processing instead of directly to a burial site.

2.4.1 This procedure addresses the requirements for 10 CFR 61.55 (Waste Classification) for radioactive material sent to vendor facilities.

2.4.2 This procedure does NOT address the requirements for 10 CFR 61.56 (Waste Characteristics), since the final processing and packaging are performed at the vendor facilities.

2.4.3 Possible types of radioactive material include, but are NOT limited to the following:

- o DAW
- o Surface Contaminated Objects
- o Bead Resins and Charcoal
- o Cartridge Filters
- o Contaminated Oil
- o Contaminated Soil

2.5 Disposition of Waste Sent Directly to a Burial Site - This procedure addresses both the 10 CFR 61.55 and 61.56 requirements for the waste streams listed in Step 2.2.

2.6 Waste Management Practices

2.6.1 DAW

- o This waste stream consists of plastic, wood, paper, metal, cloth, etc. generated at various locations within the station.
- o The material may be sent to intermediate processors or directly to a burial site.

- o The station may preprocess DAW by compacting.
- o Practices include shipping DAW classified as either SCO or LSA in numerous possible containers, such as:
  - 30 to 85 gallon drums
  - B-25 type boxes
  - SeaLand containers
  - Large liners
- o Prepacking inspection criteria includes the removal of liquid, protective clothing and equipment, paints, solvents, lead, instruments, gages and other valuable plant equipment.

#### 2.6.2 Steam Generator Blowdown Bead Resin (S/G BD)

- o This waste stream consists of only S/G blowdown resin. The depleted resins are sluiced from the individual processing vessels to the S/G Blowdown Resin Storage Tank and then to a CNSI 6-80 or 8-120 High Integrity Container (HIC), OR any other container approved by the Health Physics Radwaste Shipper (HPRS).
- o Once a container is full or the transfer has been terminated, the filter media (charcoal) and resins are then dewatered per RPP 07-131, BEAD RESIN/ACTIVATED CARBON DEWATERING PROCEDURW FOE CNSI 14-215 OR SMALLER LINERS. Compliance with freestanding water criteria is in accordance with the vendor waste acceptance criteria and/or 10CFR61.
- o Practice may include shipping resins directly to a burial site or to a volume reduction processor for incineration or release.

#### 2.6.3 Chemical and Volume Control System Bead Resin (CVCS)

- o This waste stream consists of CVCS, various Diversified Technologies media and Spent Fuel Pool resins. The depleted charcoal filter media and resins are sluiced from the individual processing vessels to a common Spent Resin Storage Tank. The media is then transferred in a batch mode to a CNSI 6-80 or 8-120 HIC, OR any other container approved by Health Physics Radwaste Shipper.

- o Once a container is full or the transfer has been terminated, the filter media (charcoal) and resins are then dewatered per RPP 07-131, BEAD RESIN/ACTIVATED CARBON DEWATERING PROCEDURE FOR CNSI 14-215 OR SMALLER LINERS. Compliance with freestanding water criteria is in accordance with the vendor waste acceptance criteria and/or 10CFR61.
- o Practice may include shipping resins directly to a burial site or to a volume reduction processor.

#### 2.6.4 Cartridge Filters

- o This category includes several waste streams which were defined in Step 2.2 and includes all filters generated by the station.
- o Filters are removed from service based on operating parameters determined by the Operations Department.
- o The filter housings are drained prior to filter removal. The filters are then gravity drained prior to being placed into an intermediate storage container OR the final disposal container.
- o With containers equipped with a dewatering internal, a final dewatering verification is performed on the disposal container after it has been loaded with filters. Compliance with freestanding water criteria is in accordance with the vendor waste acceptance criteria and/or 10CFR61.
- o Absorbent material may be added to the disposal liner after final dewatering verification at the discretion of the HPSR.
- o Practice may include shipping filters to a volume reduction processor.

#### 2.6.5 Tubular Ultra Filtration/Reverse Osmosis Waste

- o This waste stream may consist of either dried solids in a standard 55-gallon drum or Drum Dryer Hold-Up Tank liquid waste.
- o The material may be sent to intermediate processors or directly to a burial site. In the case of the liquid waste, additional processing is required.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 6 of 34

2.6.6 Solidification/Encapsulation Methods

- o Present and planned practice is NOT to solidify or encapsulate any waste streams.
- o Wet wastes (filters and resins) are dewatered to less than 0.5 percent or 1 percent by volume depending on the container type. Wet waste sent to a vendor for additional processing will be dewatered in accordance with the vendor waste acceptance criteria

2.6.7 Operation and Maintenance of dewatering Systems and Equipment

- o Present and planned practice is to utilize station personnel to operate and maintain dewatering systems and equipment using station procedures.
- o All disposal liners are manufactured by and purchased from QA approved vendors.

2.6.8 High Integrity Container Usage

- o High Integrity Containers (fabricated from high density cross-linked polyethylene) may be used as the disposal package for any waste.

**3.0 REFERENCES AND COMMITMENTS**

3.1 References

- 3.1.1 WCGS Technical Requirements (TR 5.5.4)
- 3.1.2 RPP 07-101, CONTROL OF RADIOACTIVE MATERIAL MANAGEMENT SOFTWARE AND DATA BASES
- 3.1.3 RPP 07-123, PREPARATION AND SHIPMENT OF RADIOACTIVE WASTE AND MATERIAL
- 3.1.4 RPP 07-131, BEAD RESIN/ACTIVATED CARBON DEWATERING PROCEDURE FOR CNSI 14-215 OR SMALLER LINERS
- 3.1.5 10 CFR 20, "Standard For Protection Against Radiation"
- 3.1.6 10 CFR 61, "Licensing Requirements for Land Disposal of Radioactive Waste"
- 3.1.7 10 CFR 71, "Packaging and Transportation of Radioactive Materials"
- 3.1.8 40 CFR 302, "Reportable Quantity Adjustment - Radionuclides"

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 7 of 34

- 3.1.9 49 CFR 171, "General Information, Regulations, and Definitions"
- 3.1.10 49 CFR 172, "Shippers' General Requirements for Shipments and Packaging"
- 3.1.11 49 CFR 177, "Carriage by Public Highway"
- 3.1.12 USNRC Branch Technical Position on Radioactive Waste Classification, May 1983
- 3.1.13 USNRC Branch Technical Position on Waste Form, January 1991
- 3.1.14 USNRC Branch Technical Position on Concentration Averaging and Encapsulation, Revision in Part To Waste Classification Technical Position, January 1995
- 3.1.15 NRC Bulletin No. 79-19, "Packaging of Low Level Radioactive Waste for Transport and Burial"
- 3.1.16 NRC Information Notice No. 80-24, "Low Level Radioactive Waste Burial Criteria"
- 3.1.17 NRC Information Notice No. 83-33, "Non-Representative Sampling of Contaminated Oil"
- 3.1.18 NRC Information Notice No. 85-92, "Surveys of Wastes Before Disposal from Nuclear Reactor Facilities"
- 3.1.19 NRC Information Notice No. 86-20, "Low Level Radioactive Waste Scaling Factors, 10 CFR 61"
- 3.1.20 NRC Information Notice No. 88-101, "Shipment of Contaminated Equipment Between Nuclear Power Stations"
- 3.1.21 WMG-SW-006, "Computer Software Quality Assurance Program"
- 3.1.22 WMG-QA-001, "Quality Assurance Program"
- 3.1.23 WMG-P-065 "RADMAN Operating Manual"
- 3.1.24 RADMAN Computer Code, Main Topical Report to the USNRC
- 3.1.25 WMG-P-069, "FILTRK Operating Procedure"
- 3.1.26 WMG-P-070, "RAMSHP Operating Procedure"
- 3.1.27 WMG-P-075, "OSM Operating Procedure"
- 3.1.28 WMG Report #9006, "Computer Program Dose to Curie Methodology Verification and Validation"



Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 8 of 34

- 3.1.29 U.S. Nuclear Regulatory Commission, "Radiological Effluent Technical Specifications for PWRs," NUREG-0472
- 3.1.30 NRC Guidelines for Preparation and Implementation of Solid Waste Process Control Program "DRAFT," Revision 4, October 1986
- 3.1.31 FO-AD-002, "Operating Guidelines for Use of Polyethylene High Integrity Containers"
- 3.1.32 FO-AD-023, "Bead Resin/Activated Carbon Dewatering Procedure for CNSI 14-215 or Smaller Liners"
- 3.1.33 NRC Generic Letter No. 91-02, "Reporting Mishaps Involving LLW Forms Prepared For Disposal"
- 3.1.34 WMG-9217, "10 CFR 61 Practice Assessment at Wolf Creek Generating Station, 1992"
- 3.1.35 AP 25-001, RADIATION PROTECTION QUALITY PROGRAM REQUIREMENTS
- 3.1.36 Letter from Rodney Wingard to Jimmy Still concerning the disposal of dried solids (HP 01-00601)

### 3.2 Commitments

3.2.1 None

## 4.0 DEFINITIONS

### 4.1 Abbreviations

- 4.1.1 Activity/A<sub>2</sub>/g - Package activity divided by (A<sub>2</sub>) divided by gram
- 4.1.2 BTP - Branch Technical Position
- 4.1.3 CNSI - Chem Nuclear System, Inc.
- 4.1.4 HPRS - Health Physics Radwaste Shipper
- 4.1.5 LLD - Lower Limit of Detection
- 4.1.6 MCA - Multi-Channel Analyzer

#### 4.2 Activity Correction Factor

4.2.1 The  $\mu\text{Ci/cc}$  or  $\mu\text{Ci/g}$  values may have to be corrected (plus or minus) if the waste stream specific 10 CFR 61 sample results (independent laboratory) and the replicate in-house specific activity values differ by more than 20 percent, and the differences cannot be resolved to the satisfaction of the HPSR. Alternatively, the dose-to-curie characterization methodology can be used without applying correction factors.

#### 4.3 As Generated Waste

4.3.1 Radioactive waste generated at a frequency contrary to the sampling requirements of waste classes A, B or C.

#### 4.4 Batch

4.4.1 An isolated quantity of feed waste to be processed having essentially constant physical and chemical characteristics. (The addition or removal of water will not be considered to create a new batch).

#### 4.5 Chelating Agents

4.5.1 EDTA, DTPA, hydroxyl-carboxylic acids, citric acid, carboic acid and glucinic acid.

#### 4.6 Confirmatory Analysis

4.6.1 Verification of Gross radioactivity measurements using MCA and independent laboratory sample data.

#### 4.7 Density Correction

4.7.1 Density corrections may be required to convert sample data reported in  $\mu\text{Ci/g}$  to  $\mu\text{Ci/cc}$  or vice versa when comparing sample data with unlike units.

#### 4.8 Dewatered Waste

4.8.1 Dewatered Waste refers to wet waste that has been processed by means other than solidification, encapsulation, or absorption to meet the free standing liquid requirements of 10 CFR 61.56 (a)(3) and (b)(2).

#### 4.9 Encapsulation

4.9.1 Encapsulation is a means of providing stability for certain types of waste by surrounding the waste by an appropriate encapsulation media.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 10 of 34

4.10 Gamma-Spectral Analysis

4.10.1 Also known as IG, MCA, GE/Li and gamma spectroscopy.

4.11 Gross Radioactivity Measurements

4.11.1 More commonly known as Dose to Curies conversion for packaged waste characterization and classification.

4.12 Health Physics Radwaste Shipper or HPRS

4.12.1 The person designated to sign the shipment manifest and has been trained in the DOT and NRC regulatory requirements within the last three years.

4.13 Homogeneous

4.13.1 Of the same kind or nature; essentially alike. Most waste streams are considered to have the radioactivity distributed throughout for purposes of waste classification.

4.14 Legacy Waste

4.14.1 Radioactive waste generated from past Plant processes.

4.15 Low-Level Radioactive Waste (LLW)

4.15.1 Those low-level radioactive wastes containing source, special nuclear, or by-product material that are acceptable for disposal in a land disposal facility. For the purposes of this definition, low-level radioactive waste has the same meaning as in the Low-Level Waste Policy Act, that is, radioactive waste not classified as high-level radioactive waste, transuranic waste, spent nuclear fuel, or by-product material as defined in Section 113.(2) of the Atomic Energy Act (uranium or thorium tailings and waste).

4.16 Measurement of Specific Radionuclides

4.16.1 More commonly known as core sample or package sample using MCA data for packages waste characterization and classification.

#### 4.17 Operable

4.17.1 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

#### 4.18 Pre-qualification Program

4.18.1 The testing program implemented to demonstrate that the proposed method of wet waste processing will result in a waste form acceptable to the land disposal facility.

#### 4.19 QA Verification Sample

4.19.1 A representative sample of the waste that is tested to demonstrate control of the waste processing. The sample shall be obtained from at least every tenth batch of each type of wet radioactive waste processed for stabilization.

#### 4.20 Quality Assurance/Quality Control

4.20.1 As used in this document, "quality assurance" comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service. Quality assurance includes quality control, which comprises those quality assurance actions related to control of the physical characteristics and quality of a material structure, component, or system to predetermined requirements.

#### 4.21 Sampling Plan

4.21.1 A sampling program implemented to ensure that representative samples from the feed waste and the final waste form are obtained and tested for conformance with parameters stated in the PCP and waste form acceptance criteria.

#### 4.22 Scaling Factor

4.22.1 A dimensionless number which relates the concentration of an easy to measure nuclide (gamma emitter) to one which is difficult to measure (beta/alpha emitters).

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 12 of 34

#### 4.23 Shipping Paper

4.23.1 At WCGS the shipping paper consists of an NRC form 540 and 541 (or equivalent). Additional documentation may be provided (i.e., bill of lading) but is not consecutively numbered as part of the shipping papers.

#### 4.24 Significant Quantity

4.24.1 For purposes of sample evaluation, waste classification and manifesting radionuclides on shipping papers, the following radionuclide limits shall be considered significant:

- o Any LLD value for a 10 CFR Part 20, Appendix G required radionuclide.
- o Any radionuclide representing greater than 5 percent of the relative  $A_2$  fraction hazard.
- o Any real value for a radionuclide specifically listed in 10 CFR Part 61.55.
- o Any radionuclide representing greater than 1 percent of the total activity.
- o Any radionuclide greater than 0.5 RQ value.

#### 4.25 Special Nuclides

4.25.1 RADMAN Computer Code user term for 10 CFR Part 20, Appendix G required nuclides.

#### 4.26 Stability

4.26.1 As used in this document, "stability" means structural stability. Stability requires that the waste form maintain its structural integrity under the expected disposal conditions.

#### 4.27 Waste Container

4.27.1 A vessel of any shape, size, and composition used to contain the final or intermediate processed waste.

#### 4.28 Waste Form

4.28.1 Waste in a stable waste form or container acceptable for disposal at a licensed disposal facility.

#### 4.29 Waste Processing

4.29.1 Changing, modifying, packaging the commercial nuclear power plant generated wet radioactive waste into a form that is acceptable to a disposal facility.

#### 4.30 Waste Stream

4.30.1 A station specific and constant source of waste with a distinct radionuclide content and distribution.

#### 4.31 Waste Type

4.31.1 A single packaging configuration tied to a specific waste stream, or multiple package types tied to the same waste stream.

### **5.0 RESPONSIBILITIES**

5.1 Health Physics Radwaste Shipper is responsible for:

5.1.1 Implementing this procedure.

5.1.2 Ensuring that radioactive waste is classified and characterized in accordance with 10 CFR 61.55 receiving facility criteria.

5.1.3 Designating other approved procedures (if required) to be implemented in the packaging of any specific batch of waste.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 14 of 34

## 6.0 PROCEDURE

- 6.1 The precautions/limitations of this procedure are listed below.
- 6.1.1 All plant personnel that have any involvement with the RADMAN, TRASHP, and FILTRK computer codes shall be familiar with its functions, operation, and maintenance.
  - 6.1.2 Only authorized personnel will characterize or package radioactive waste or radioactive materials.
  - 6.1.3 Radioactive materials shall be handled in accordance with applicable Radiation Protection Procedures.
  - 6.1.4 Pressure and heat may be encountered during the operation of liquid waste processing systems.
    - 1. Caution must be exercised during disassembly and disconnection of lines or equipment and valve realignments.
  - 6.1.5 Each HIC is matched with specific closure components and seals at time of manufacture.
    - 1. All components are identified using a common serial number.
    - 2. Should components become mismatched, contact the HPSR for instructions prior to use.
  - 6.1.6 Waste must NOT be packaged for disposal in cardboard or fiberboard boxes.
  - 6.1.7 Liquid waste must be solidified or packaged in sufficient absorbent material to absorb twice the volume of the liquid.
  - 6.1.8 Solid waste containing liquid shall contain as little free standing and non-corrosive liquid as is reasonably achievable, but in no case shall the liquid exceed 1 percent of the volume in HIC's and 0.5% in a steel liner.
  - 6.1.9 Waste must NOT be readily capable of detonation or of explosive decomposition or reaction at normal pressures and temperatures, or of explosive reaction with water.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 15 of 34

- 6.1.10 Waste must NOT contain, or be capable of generating, quantities of toxic gases, vapors, or fumes harmful to persons transporting, handling, or disposing of the waste. This does NOT apply to radioactive gaseous waste packaged in accordance with Step 6.1.12 of this section.
- 6.1.11 Waste must NOT be pyrophoric. Pyrophoric materials contained in waste shall be treated, prepared, and packaged to be non-flammable.
- 6.1.12 Waste in a gaseous form must be packaged at a pressure that does not exceed 1.5 atmospheres at 20°C. Total activity must not exceed 100 curies per container.
- 6.1.13 Waste containing hazardous, biological, pathogenic, or infectious material must be treated to reduce to the maximum extent practicable the potential hazard from the non-radiological materials.
- 6.1.14 All data entries should use three significant figures only (i.e., X.XXE-x). IF more significant figures are provided, round off to generate three significant figures.
- 6.1.15 Use only those isotopes reported as real values, ignore all isotopes reported as LLD values, except those nuclides listed in Step 6.6.7.
- 6.1.16 Ignore all radioisotopes with half-lives less than eight (8) days based on I-131.
- 6.1.17 Revisions to this procedure shall be documented with form APF 15C-004-01, DOCUMENT REVISION REQUEST and shall contain: (Step 3.1.1)

1. Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s).

AND

2. A determination that the change will maintain the overall conformance of the waste product to existing requirements of Federal, State, or other applicable regulations.



- 6.2 Special equipment, material, and parts needed to perform tasks are shown below.
- 6.2.1 Required tools and equipment will vary depending on the specific process and waste container that is used.
- 6.2.2 The various tools and equipment, which may be required, are detailed in the vendor procedures listed in Section 3.0.
- 6.3 Prerequisites before beginning work with this procedure.
- 6.3.1 Ensure that a current set of DOT, NRC and burial site regulations is maintained at the station and is available for reference.
- 6.3.2 Ensure that representative sample data is on file for each waste stream. Data is considered to be current if it meets the following:
1. The waste stream must be sampled at least every two years for NRC Class A waste.
  2. The waste stream must be sampled at least every year for NRC Class B or C waste. Exceptions are:
    - a. legacy waste
    - b. as generated waste
  3. Non-waste radioactive material shall be sampled on a fuel cycle or as generated basis with (non-irradiated) fuel pool material differentiated from balance of plant material.
- 6.3.3 A training program shall be developed and implemented for personnel having responsibilities related to waste processing operations to ensure the waste processing shall be performed within the requirements of the PCP.
1. Personnel will be trained to the extent equal to their responsibilities. WCGS credits training provided in accordance with standards or regulations of other federal agencies, such as the Occupational Safety and Health Administration or the Environmental Protection Agency.
  2. The training program shall be repeated and the personnel requalified on a periodic schedule, not to exceed three years.
  3. The individual's training records shall be maintained and available for audit and inspection.

6.3.4 Additional requirements for contracted vendors processing waste.

1. Management shall review vendor(s) topical reports.

**NOTE**

**The PCP does NOT have to include the vendors Topical Report if it has NRC approval, or has been previously submitted to the NRC.**

- a. This review will assure the vendors operations and requirements are compatible with the responsibilities and operation of the plant.
- b. The training requirements and records listed in Step 6.3.3 also apply to contracted vendors.
- c. The station shall maintain copies of records to verify training of vendor personnel.

6.4 Procedure For Performing Work

6.4.1 Methods and frequency for determining the radionuclide concentration for each waste stream.

1. Ensure samples are representative of the final waste form.
2. Determine the base line density for each waste stream (NOT applicable for DAW and filters). The density is determined by waste weight and volume.

**NOTE**

**For WCGS, waste stream radionuclide content is considered to be distributed throughout for purpose of waste classification.**

6.4.2 Treat each waste stream separately for classification purposes.

6.4.3 Send all NRC Class A waste samples to an independent laboratory for gamma, beta and alpha analysis at least once every two years.

1. Perform an in-house analysis for gamma emitting radionuclides for each sample sent to an independent lab for future comparison.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 18 of 34

2. Periodically perform in-house analysis for gamma emitting nuclides for comparison to the current data base values for gamma emitters (the current data base is usually based on the most recent independent laboratory results).
- 6.4.4 Send all NRC Class B and C waste samples to an independent laboratory for gamma, beta and alpha analysis at least once a year, except as defined in 6.3.2. The additional steps required are identical to substeps 1 and 2 of Step 6.4.3.
  - 6.4.5 Determine the status (real value, LLD or not present) of the 10 CFR 20 Appendix G required nuclides for each waste stream from the recent independent laboratory data.
  - 6.4.6 Document and track all samples per RPP 07-101, CONTROL OF RADIOACTIVE MATERIAL MANAGEMENT SOFTWARE AND DATA BASES.
- 6.5 Current and planned practice for each waste stream is as follows:
- 6.5.1 DAW
    1. Obtain composite smears from various contaminated areas of the plant periodically or at a minimum biennially and analyze (IG) them in-house for gamma emitters. Sample periodicity should be based on the conditions outlined in Step 6.8.
    2. Compare the results of the samples to the database to ensure adequacy of sample frequency.
    3. Send the most recent group of composite smears to an independent laboratory for analysis biennially or more often IF determined necessary by HPRS.
    4. Maintain records for all samples for nuclide identification, distribution and scaling factors.

**NOTE**

The specific activity ( $\mu\text{Ci}/\text{cc}$  or  $\mu\text{Ci}/\text{g}$ ) is **NOT** required since all characterization/classification calculations are performed using a dose/curie methodology which only relies on fractional abundance.

5. Both in-house and independent laboratory results are normally reported in  $\mu\text{Ci}/\text{sample}$ .

6. Forward the results from the independent laboratory to the HP Dosimetry/Calibration Lab for evaluation on RPF 01-405-05, "DETERMINATION OF DETECTABLE VS. NON-DETECTABLE ACTIVITY FOR RELEASE FROM THE RCA".

#### 6.5.2 S/G Blowdown Resin

1. Obtain several (as determined by the HPRS) composite samples from the resin transfer line during liner loading operations on an "as generated" basis.

#### **NOTE**

**Each liner is considered a different batch for sampling and classification purposes.**

2. Analyze the samples in-house (IG) and retain the results for future comparison to the replicate independent laboratory results.
3. Send the samples to an independent laboratory for analysis biennially or as generated.
4. Maintain records for all samples for nuclide identification, distribution and scaling factors.
5. Both in-house independent laboratory results are normally reported in the same units ( $\mu\text{Ci/g}$  or  $\mu\text{Ci/cc}$ ).

#### 6.5.3 CVCS Resin

1. The sampling procedure is exactly the same as listed above for S/G Blowdown Resin in Step 6.5.2 except the analysis frequency is annual or as generated.

6.5.4 Filters

1. Obtain samples from each individual filter waste stream defined in Step 2.2 on an annual OR as generated basis.

**NOTE**

Samples may be taken from the actual filter media, from a smear of the filter media, from a smear of the filter housing, or a crud sample, as determined by the HPSR. The preferred method is the crud sample.

2. Perform an in-house (IG) analysis of the sample (or replicate sample) and retain the output record for future comparison to the independent laboratory results.
3. Send the sample to an independent laboratory for analysis once per year or more often if determine necessary by the HPRS.
4. Maintain records for all samples for nuclide identification, distribution and scaling factors.

**NOTE**

**CORRECTIVE ACTION FOR ADJUSTING Co-58 SCALING FACTORS FOR FILTERS DURING CRUD BURSTS ENCOUNTERED WITH CHEMICAL INJECTIONS AND 100% LOAD REJECTIONS**

5. The Co-58 scaling factors should be adjusted when the total radioactivity increases for filters during the above conditions, the activity increase is primarily Co-58 not Co-60, if the scaling factors are not adjusted the filters can be overestimated for NRC waste classification.
  - a. Step 1, Obtain a filter sample.
  - b. Step 2, Count the sample in-house, it is not necessary to perform an independent laboratory analysis.
  - c. Step 3, Divide the Co-58 value by the Co-60 value, this is the scaling factor.
  - d. Step 4, Obtain a hard copy of the Part 61 filter waste stream.

- e. Step 5, Apply the Step 3 scaling factor to the database Co-60 value.
- f. Step 6, Create a new (crud burst) Part 61 waste stream with the new Co-58 value.
- g. Step 7, Characterize filters.

**NOTES**

- o Document that there are two Part 61 waste streams for the same filters depending on operating conditions.
- o The specific activity ( $\mu\text{Ci}/\text{cc}$  or  $\mu\text{Ci}/\text{g}$ ) is not required since all characterization/classification calculations are performed using a dose/curie methodology which only relies on fractional abundance.

6. Both in-house and laboratory results are normally reported in  $\mu\text{Ci}/\text{sample}$ .

6.5.5 Tubular Ultra Filtration/Reverse Osmosis Waste

1. Obtain a sample from the waste stream on an annual or as generated basis.
2. Perform an in-house (IG) analysis of the sample (or replicate sample) and retain the output record for future comparison to the independent laboratory results.
3. Send the sample to an independent laboratory for analysis once per year or more often if determine necessary by the HPRS.
4. Maintain records for all samples for nuclide identification, distribution and scaling factors.

6.6 Sample Evaluation

6.6.1 Infrequent or Abnormal Waste Types

1. Infrequent or abnormal waste types that may be generated must be evaluated on a case-by-case basis.
2. The HPRS will determine if the waste can be correlated to an existing waste stream.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 22 of 34

3. If the radioactive material cannot be correlated to an existing waste stream, the HPRS shall determine specific off-site sampling and analysis requirements necessary to properly classify the material.

6.6.2 Examples of these radioactive materials include, but are not limited to:

- o Contaminated Soil
- o Contaminated Oil
- o Special Filters or Resin
- o A mixture of radioactive material types in one container.

6.6.3 Requirements for analysis to be performed by an off-site vendor are as follows:

1. All sample results must reference the quantity received.
2. All sample results shall be decay corrected to a reference date provided by the station which is normally the sample date.
3. The sample results shall be reported in  $\mu\text{Ci}/\text{sample}$ ,  $\mu\text{Ci}/\text{g}$  or  $\mu\text{Ci}/\text{cc}$  as determined the HPSR.

**NOTE**

**Outside analysis is NOT performed for any radionuclides with a half-life less than eight days.**

6.6.4 The vendor shall perform analysis for the following radionuclides listed in Table 1 of 10 CFR 61.55.

1. C-14, Tc-99, I-129, Pu-241, Cm-242 and the following alpha emitting transuranics (TRUs) with half-lives greater than five years, Np-237, Pu-238, Pu-239/240, Pu-242, Am-241, and Cm-243/244.
  - a. Additionally Ni-59 and Nb-94 are required for Rx cavity and fuel pool filters.

**NOTE**

**If evaluation of several sets (i.e., three or more) of waste stream specific historical sample data shows that some TRUs with half-life greater than five years are consistently reported as LLD values, sample analysis may be discontinued for those specific radionuclides.**

2. Analysis for the "activated metal" radionuclides listed in Table 1 of 10 CFR Part 61 are only required for the fuel pool filters and reactor cavity filters waste streams identified at WCNOG.
  3. It is NOT necessary to contract for an offsite vendor to perform analysis for enriched uranium or other naturally occurring radionuclides not delineated in this procedure.
  4. Radionuclides listed in Table 1 of 10 CFR 61.55 shall be specifically identified and the quantities reported on shipping manifests if they are significant for purposes of classification.
- 6.6.5 The vendor shall perform analysis for the following radionuclides listed in Table 2 of 10 CFR 61.55.
1. H-3, Co-60, Ni-63, Sr-90 and Cs-137
  2. Radionuclides listed in Table 2 of 10 CFR 61.55 shall be specifically identified and the quantities reported on shipping manifests if they are significant for purposes of classification.
- 6.6.6 The vendor shall perform analysis for the following radionuclides NOT listed in Table 1 or Table 2 of 10 CFR 61.
1. Activation Products - Cr-51, Mn-54, Fe-55, Co-58, Fe-59, Sb-124, Sb-125, Zn-65, Ag-110M and any other nuclides identified in significant quantities by in-house IG equipment.



2. Fission Products - Zr-95, Nb-95, Ru-103, Ru-106, Cs-134, Ce-141, Sr-89, Ce-144 and any other nuclides identified in significant quantities by in-house IG equipment.

6.6.7 A waste stream specific database must include the following radionuclides, even if they are reported as LLD values:

1. H-3, C-14, Tc-99, I-129 required by 10 CFR 20 Appendix G (H-3 is considered real or LLD for DAW because "not present" cannot be substantiated).
2. Co-60, Cs-137, and Ce-144 (only if TRUs are reported) required by the RADMAN computer code. They are used as the primary scaling radionuclides.
3. The HPRS can change the base scaling radionuclides.

**NOTE**

**Samples sent to offsite laboratories for analysis should contain sufficient activity to determine the presence of transuranic nuclides. The minimum recommended sample activity level is 50,000 dpm. If that level cannot be attained, the highest activity should be used for offsite analysis.**

6.7 Sample Analysis and Comparison

- 6.7.1 Whenever a sample is sent off-site for analysis, count the same sample (or replicate) in-house with the station IG system.

**NOTE**

**Isotopic results that are not considered statistically positive at the 99.9% confidence level are considered "suspect" values and shall be discarded as necessary.**

- 6.7.2 Comparison of on-site versus off-site analysis shall be evaluated to identify and resolve any discrepancies. As a minimum, the comparison shall include:
- o Specific activity by gamma emitting radionuclides. (NOT applicable for DAW or filter samples.)
  - o Co-60/Cs-137 Ratio
  - o Presence or absence of radionuclides
  - o Predominant radionuclides

- o Individual radionuclide fractional abundance
  - o Scaling factors
- 6.7.3 Records of on-site and off-site sample analysis and evaluations by waste stream are maintained by the HPRS.
- 6.7.4 IF a comparison between the in-house and independent laboratory results shows a variance of 20 percent or greater for specific activity, the MCA results may be adjusted until the discrepancy is resolved. Reported MDC should be consistent with the measurement uncertainty. The relative uncertainty ( $1\sigma$ ) of the measurement should be ~30% at the MDC and should get smaller as the measured concentration increases above the MDC level.
1. Any discrepancies should be resolved (if possible) in-house or with the independent laboratory as soon as possible.
  2. The use of these activity correction factors is only valid if other conditions defined in Step 6.7.2 above compare favorably, otherwise the sample set should be considered suspect and the data should not be used. This would require another sample as soon as possible.
- 6.7.5 Radionuclides with a half-life less than eight days are also ignored from internal MCA reports.
- 6.7.6 New sample data shall be periodically obtained and evaluated.
- 6.7.7 New sample data may be either off-site analysis or in-house MCA analysis.
- 6.7.8 Once a database has been established, based on off-site analysis, the MCA results are primarily used as a "flag" to obtain and send additional samples off-site. Exceptions to this may occur during crud burst situations where it is necessary to adjust the scaling factor relationship of the activation products. An example would be the  $^{58}\text{Co}/^{60}\text{Co}$  ratio after hydrogen peroxide additions.
- 6.7.9 The RADMAN analyze utility program may be utilized to evaluate multiple sets of data.

**NOTE**

**Isotopic results that are NOT considered statistically positive at the 99.9% confidence level are considered "suspect" values and shall be discarded as necessary.**

6.7.10 Several comparisons to the existing database shall be considered when evaluating new sample data.

1. Radionuclide fractional abundance and scaling factor relationships
2. Specific activity by radionuclide
3. Swings in driving classifications radionuclides
4. Radionuclides present in database, but NOT present in new sample or vice versa
5. Total activity by sample set

6.8 Sample Frequency

6.8.1 The following may require increased sampling:

1. Increase in failed fuel fraction as determined by:
  - o D.E.I. 25% of Technical Specification limit
  - o Increase of I-131/I-133
  - o Np-239 greater than 0.01  $\mu\text{Ci/cc}$  in reactor coolant
  - o Significant increase in gross alpha sample results on any type of smear survey
2. Crud burst during 100% load rejection or chemical cleaning
3. Extended reactor shutdown (>90 days)
4. Changes to liquid waste processing, such as bypassing filters, utilizing filters or a change in ion exchange media

## 6.9 Scaling Factors

- 6.9.1 WCGS has established an inferential measurement program, whereby, concentrations of radioisotopes which cannot be readily measured are estimated through ratioing to concentrations of radioisotopes which can be readily measured.
- 6.9.2 Scaling factors have been developed on a facility and waste stream specific basis, and are periodically confirmed through direct measurements.
- 6.9.3 Correlations between measured and inferred radionuclides are currently as follows, but can be changed at HPRS discretion:
1. Ce-144 to transuranic nuclides
  2. Co-60 to activation product nuclides and C-14
  3. Cs-137 to fission product nuclides

## 6.10 Waste Classification

### NOTE

**The volume and mass of the waste form (not the waste container) is used for most waste classification calculations.**

- 6.10.1 Determine the waste classification (Class A stable or unstable, Class B, Class C) by the concentration of certain radionuclides in the final waste form as listed in 10 CFR 61.55.
- 6.10.2 Determine the radionuclide concentrations per RPP 07-123 PREPARATION AND SHIPMENT OF RADIOACTIVE WASTE AND MATERIAL, as follows:
1. DAW - "Gross Radioactivity Measurements" in conjunction with the RADMAN computer code or hand calculations
  2. Filters - "Gross Radioactivity Measurements" in conjunction with the FILTRK computer code or hand calculations
  3. All other waste streams - "Direct Measurement of Individual Radionuclides" in conjunction with the RADMAN computer code or hand calculations

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 28 of 34

#### 6.11 Quality Control For Sampling And Classification

- 6.11.1 The RADMAN computer code provides a mechanism to assist WCGS in conducting a quality control program to aid in compliance with the waste classification requirements listed in 10 CFR 61.55.
- 6.11.2 Management audits of the WCNOG Sampling and Classification Program shall be performed in accordance with the approved self assessment schedule.
- 6.11.3 The audits are performed and documented by any of the following:
- \*Health Physics Department
  - \*Subject Matter Experts
  - \*Quality Assurance Department
- OR
- \*Qualified Vendors

#### 6.12 Non-Waste Classification

- 6.12.1 Determine the radioactive material classification (Excepted Package, LSA, SCO, Type A, >Type A or Type B) by the total activity or activity as listed in DOT regulations and the receiver's radioactive material licenses.
- 6.12.2 Determine the radionuclide concentrations per RPP 07-123 PREPARATION AND SHIPMENT OF RADIOACTIVE WASTE AND MATERIAL, as follows:
1. Non-irradiated material removed from the spent fuel pool - "Gross Radioactivity Measurements," "Direct Measurement of Individual Radionuclides", or "Measurement of Surface Contamination Levels" for non-radioactive material contaminated with radioactive material in conjunction with the RAMSHP computer code or hand calculations.
  2. Any other radioactive material generated by the station - The same methods listed for fuel pool material may be used with a separate radionuclide database.

### 6.13 Processing General Requirements

**NOTE**

**The dewatering capabilities are verified by vendor Topical Reports or operating and testing procedures.**

- 6.13.1 Verify the wastes contain only trace amounts of drainable liquid, and in NO case may the volume of free liquid exceed one percent of the waste volume when wastes are disposed of in containers designed to provide stability.

**NOTE**

**The following verification is performed on a case-by-case basis for each package using independent laboratory data and MCA data in conjunction with computer codes or hand calculations.**

- 6.13.2 Verify that resins are NOT processed that have loadings which will produce greater than 1.0 E+8 rads (350  $\mu$ Ci/cc) total accumulated dose. This only applies to two radionuclides, Cs-137 and Sr-90.
- 6.13.3 The as generated waste must be compatible with the disposal container.

### 6.14 Processing Requirements During Dewatering Operations

- 6.14.1 Perform all dewatering operations per RPP 07-131, BEAD RESIN/ACTIVATED CARBON DEWATERING PROCEDURE FOR CNSI 14-215 OR SMALLER LINERS.

**NOTE**

**This procedure may only be used to dewater CNSI's 14-215 or smaller liners containing bead-type ion exchange resins and activated carbon with less than 1 percent oil.**

- 6.14.2 Complete form RPF 07-131-01, HIC DEWATERING COMPLETION RECORD, for each liner prior to final closure.
- 6.14.3 Form RPF 07-131-01, HIC DEWATERING COMPLETION RECORD, must be included in the shipping paperwork package with the shipment.
- 6.14.4 The final transfer/dewatering cycle shall be counted as the first pumping cycle IF after the transfer is completed, the liner is dewatering per this procedure.

Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 30 of 34

6.14.5 Final dewatering verification is determined by the following:

1. 1% Free-Standing Water or Less

- a. After a minimum of two (2) pumping cycles for bead resins or five (5) cycles for activated carbon, a measured volume of less than five (5) gallons on the next eight (8) hours of pumping shall be the acceptance criteria.
- b. IF five (5) gallons or more are collected, the waiting/pumping cycle shall be repeated until less than five (5) gallons are collected.

2. 0.5% Free-Standing Water or Less

- a. After a minimum of five (5) pumping cycles for bead resins or eight (8) pumping cycles for activated carbon, a measured volume of less than two (2) gallons on the next eight (8) hours of pumping shall be the acceptance criteria.
- b. IF two (2) gallons or more are collected, the waiting/pumping cycle shall be repeated until less than two (2) gallons are collected.

6.15 Packaging General Requirements

**NOTE**

**The following general requirements are normally verified by review of a HIC's Certificate of Compliance (C of C) and State/NRC approval.**

- 6.15.1 Ensure that the waste is in a container or structure that provides stability after disposal.
- 6.15.2 Ensure that the container is resistant to degradation caused by radiation effects.
- 6.15.3 Ensure the container is resistant to bio-degradation.
- 6.15.4 Verify that the container will remain stable under the compressive loads inherent in the disposal environment.
- 6.15.5 Verify that the container will remain stable if exposed to moisture or water after disposal.
- 6.15.6 Ensure that the "as generated" waste is compatible with the container.

**6.16 Packaging Vendor Requirements**

- 6.16.1 Perform all inspection, handling and loading operations per vendor procedure, FO-AD-002.

**NOTE**

**Prior to use, each user will have on file within Chem-Nuclear System, Inc. Regulatory Affairs Department a "Polyethylene High Integrity Container Certification Statement."**

- 6.16.2 IF required, complete form FO-AD-002 HIC USER'S CHECKLIST, and transmit it to the vendor and maintain a copy on file.
- 6.16.3 Complete form FO-AD-002 HIC USER'S CHECKLIST, for each HIC liner as required.
- 6.16.4 Include Form FO-AD-002 HIC USER'S CHECKLIST, in the shipping paperwork package with the shipment as required.
- 6.16.5 Storage Conditions

**NOTES**

- o Containers stored out-of-doors in direct sunlight must be used within one year of fabrication.
- o The design of the storage facility must preclude the possibility of a wet or damp environment and any prolonged exposure of the container to any source of ultraviolet light.

1. Ensure that containers are stored out of direct sunlight (if possible) and away from any other sources of ultraviolet radiation.
2. Store all containers in such a way that the bottom is flat and that no weight is located over the manway/fill port area.
3. Each container shall be stored with its designated closure assemblies to prevent mismatching.
4. Following filling and closure of the container, it may be stored on-site prior to shipment for burial.



Revision: 8	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 32 of 34

6.16.6 Inspection Prior To Use

1. Visually inspect thread and seal areas to verify they are free of foreign matter that could impair the seal or thread engagement.
2. Visually inspect the exterior surfaces for damage that may have occurred during transport or storage that could lessen container integrity.

6.16.7 Handling And Lift Requirements

**NOTE**

**Due to the nature of the container material, some bowing and deformation may be evident during lifting.**

1. Use only lift band(s), lift lugs and slings provided with the liner for lifting.
2. Inspect the underdrain assembly prior to use if the container was dropped or banged against another object.

6.17 Additional Energy Solutions Containerized Waste Facility Requirements

- 6.17.1 Each package of waste must be clearly labeled to identify whether it is Class A, Class B, or Class C waste, in accordance with 10 CFR 61.55.
- 6.17.2 All waste received at the CWF facility must be disposed in approved disposal overpacks.
- 6.17.3 Void spaces within the waste and between the waste and its packaging shall be reduced to the extent practicable, but in NO case shall the container be less than 215 cubic foot or less than eighty-five percent (85%) full.

**NOTE**

**The acceptable void space depends upon the volume of the disposal container. This criteria is outlined in the Energy Solutions Waste Acceptance Criteria.**

- 6.17.4 HPRS must apply for a variance request prior to shipment.

**7.0** RECORDS

7.1 The following QA Records are generated by this procedure.

7.1.1 Completed HIC USER'S CHECKLIST (FO-AD-002)

7.1.2 Completed CERTIFICATION STATEMENT FOR DISPOSAL OF  
POLYETHYLENE HIGH INTEGRITY CONTAINERS (FO-AD-002)

7.2 The following Non-QA Record is generated by this procedure.

7.2.1 Completed POLYETHYLENE HIGH INTEGRITY CONTAINER  
CERTIFICATION STATEMENT (FO-AD-002)

**8.0** FORMS

8.1 FO-AD-002, HIC USER'S CHECKLIST

8.2 FO-AD-002, CERTIFICATION STATEMENT FOR DISPOSAL OF POLYETHYLENE  
HIGH INTEGRITY CONTAINERS

8.3 FO-AD-002, POLYETHYLENE HIGH INTEGRITY CONTAINER CERTIFICATION  
STATEMENT

- END -

## ATTACHMENT A

(Page 1 of 1)

## TECHNICAL REQUIREMENTS (SECTION 5.5.4)

Process Control Program (PCP)

The PCP shall contain the current formulas, sampling, analyses, test, and determinations made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

## Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by the Quality Program Manual Section 17.9. This documentation shall contain:
  - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  - b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
2. Shall become effective after review and acceptance by the Plant Safety Review Committee and the approval of the Plant Manager.

- END -

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

AP 31A-100

SOLID RADWASTE PROCESS CONTROL  
PROGRAM

Responsible Manager

MANAGER RADIATION PROTECTION

Revision Number	9
Use Category	Information
Administrative Controls Procedure	Yes
Management Oversight Evolution	No
Program Number	25

DC7 11/28/2018

## TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1.0	PURPOSE	2
2.0	SCOPE	2
3.0	REFERENCES AND COMMITMENTS	5
4.0	DEFINITIONS	7
5.0	RESPONSIBILITIES	12
6.0	PROCEDURE	13
7.0	RECORDS	32
8.0	FORMS	32
ATTACHMENT A	TECHNICAL REQUIREMENTS (SECTION 5.5.4)	33

**1.0 PURPOSE**

1.1 This procedure provides instructional guidance and a description of the solid waste Process Control Program (PCP). The PCP describes the methods used for processing wet low-level radioactive waste into a waste form acceptable for disposal, in accordance with 10 CFR 61 requirements, at a licensed land disposal facility.

**2.0 SCOPE**

2.1 This procedure describes current and planned practice for sampling, sample evaluation, classification, processing and packaging of radioactive material. This procedure does not address irradiated hardware which will be managed on a case by case basis under the direction of the Radiation Protection Manager (RPM). System descriptions and operating practices are described in the following steps.

2.2 Waste Stream Identification - The station identified six different waste streams and treats each separately for classification purposes. The identification listing may be consolidated, expanded and streams deleted at the discretion of radwaste management without revising the PCP.

**EXAMPLES**

- o Dry Active Waste (DAW)
- o Tubular Ultra Filtration/Reverse Osmosis Process Waste
- o Chemical and Volume Control System(CVCS) Bead Resin (1)
- o Reactor Coolant System Filters
- o Spent Fuel Pool Filters
- o Radwaste Resins

(1) May contain combination of CVCS, Diversified, and Spent Fuel Pool Resins

2.3 Non-Waste Stream Identification - The station has identified two different sources and treats each separately for classification purposes.

- o Non-irradiated material removed from the Spent Fuel Pool.
- o Any other radioactive material generated by the station.

2.4 Disposition of Radioactive Material Sent to a Vendor for Processing - Current practice includes sending all radioactive material types listed in step 2.2 to Energy Solutions, or other vendors for processing. Radioactive wastes shipped off-site for processing are not required to be solidified or dewatered to meet disposal requirements and are not subject to the solidification or dewatering requirements of the PCP.

2.4.1 This procedure addresses the requirements for 10 CFR 61.55 (Waste Classification) for radioactive material sent to vendor facilities.

2.4.2 This procedure does NOT address the requirements for 10 CFR 61.56 (Waste Characteristics), since the final processing and packaging are performed at the vendor facilities.

2.4.3 Vendors providing PCP services offsite will meet the requirements of their PCP process and applicable quality assurance requirements.

2.5 Disposition of Waste Sent Directly to a Burial Site - This procedure addresses both the 10 CFR 61.55 and 61.56 requirements for the waste streams listed in Step 2.2.

## 2.6 Waste Management Practices

### 2.6.1 DAW

- o This waste stream consists of plastic, wood, paper, metal, cloth, etc. generated at various locations within the station.
- o The station may preprocess DAW by compacting.
- o Practices include shipping DAW classified as either SCO or LSA in numerous possible containers, such as:
  - \* 30 to 85 gallon drums
  - \* B-25 type boxes
  - \* SeaLand containers
  - \* Large liners
- o Prepacking inspection criteria includes the removal of liquid, protective clothing and equipment, paints, solvents, lead, instruments, gages and other valuable plant equipment.

### 2.6.2 Chemical and Volume Control System (CVCS) Bead Resin

- o This waste stream consists of CVCS, various Diversified Technologies media and Spent Fuel Pool resins. The depleted charcoal filter media and resins are sluiced from the individual processing vessels to a common Spent Resin Storage Tank or transferred directly to an Energy Solutions 8-120 high integrity container (HIC), **OR** any other container approved by Radiation Protection Radioactive Materials Shipper(RMS).
- o Once a container is full or the transfer has been terminated, the filter media (charcoal) are processed and resins are then dewatered per RPP 07-131, Bead Resin/Activated Carbon Dewatering Procedure for Energy Solutions 14-215 or Smaller Liners, Utilizing Energy Solutions Self-Engaging Dewatering System (S.E.D.S.) Compliance with freestanding water criteria is in accordance with the vendor waste acceptance criteria or 10CFR61.

### 2.6.3 Cartridge Filters

- o This category includes several waste streams which were defined in Step 2.2 and includes all filters generated by the station.
- o Filters are removed from service based on operating parameters determined by the Operations Department.
- o The filter housings are drained prior to filter removal. The filters are then gravity drained prior to being placed into an intermediate storage container **OR** the final disposal container.
- o When sent for direct disposal, a final dewatering verification is performed on containers equipped with a dewatering internal after it has been loaded with filters. Compliance with freestanding water criteria is in accordance with the vendor waste acceptance criteria or 10CFR61.
- o Absorbent material may be added to the disposal liner after final dewatering verification at the discretion of the RMS.



#### 2.6.4 Tubular Ultra Filtration/Reverse Osmosis Waste

- o This waste stream may consist of either filtration membranes or Drum Dryer Hold-Up Tank liquid waste.
- o The membranes are processed as cartridge filters per step 2.6.3.
- o Liquid wastes are transferred from the collection tank to an Energy Solutions 8-120 liner or other suitable container and sent directly to a vendor for additional processing.

#### 2.6.5 Solidification/Encapsulation Methods

- o Present and planned practice is NOT to solidify or encapsulate any waste streams at the WCGS Facility.

#### 2.6.6 Wet wastes

- o Filters and resins are dewatered to less than 0.5 percent or 1 percent by volume depending on the container type. Wet waste sent to a vendor for additional processing will be processed in accordance with the approved vendor's processing program.

#### 2.6.7 Operation and Maintenance of Dewatering Systems and Equipment

- o Present and planned practice is to utilize station personnel to operate and maintain dewatering systems and equipment using station procedures.
- o All disposal liners are manufactured by and purchased from approved vendors.

#### 2.6.8 High Integrity Container Usage

- o High Integrity Containers (HIC) (fabricated from high density cross-linked polyethylene) may be used as the disposal package for any waste. Any vendor supplied HIC will have the appropriate regulatory approved report documenting compliance with waste form requirements when utilized for direct disposal.

### **3.0 REFERENCES AND COMMITMENTS**

#### **3.1 References**

- 3.1.1 WCGS Technical Requirements (TR 5.5.4)
- 3.1.2 RPP 07-101, CONTROL OF RADIOACTIVE MATERIAL MANAGEMENT SOFTWARE AND DATA BASES

- 3.1.3 RPP 07-123, PREPARATION AND SHIPMENT OF RADIOACTIVE WASTE AND MATERIAL
- 3.1.4 RPP 07-131, BEAD RESIN/ACTIVATED CARBON DEWATERING PROCEDURE FOR CNSI 14-215 OR SMALLER LINERS, Utilizing Energy Solutions Self-Engaging Dewatering System.
- 3.1.5 10 CFR 20, "Standard For Protection Against Radiation"
- 3.1.6 10 CFR 61, "Licensing Requirements for Land Disposal of Radioactive Waste"
- 3.1.7 10 CFR 71, "Packaging and Transportation of Radioactive Materials"
- 3.1.8 40 CFR 302, "Reportable Quantity Adjustment - Radionuclides"
- 3.1.9 49 CFR 171, "General Information, Regulations, and Definitions"
- 3.1.10 49 CFR 172, "Shippers' General Requirements for Shipments and Packaging"
- 3.1.11 49 CFR 177, "Carriage by Public Highway"
- 3.1.12 USNRC Branch Technical Position on Radioactive Waste Classification, May 1983
- 3.1.13 USNRC Branch Technical Position on Waste Form, January 1991
- 3.1.14 USNRC Branch Technical Position on Concentration Averaging and Encapsulation, Revision in Part To Waste Classification Technical Position, January 1995
- 3.1.15 NRC Bulletin No. 79-19, "Packaging of Low Level Radioactive Waste for Transport and Burial"
- 3.1.16 NRC Information Notice No. 80-24, "Low Level Radioactive Waste Burial Criteria"
- 3.1.17 NRC Information Notice No. 83-33, "Non-Representative Sampling of Contaminated Oil"
- 3.1.18 NRC Information Notice No. 85-92, "Surveys of Wastes Before Disposal from Nuclear Reactor Facilities"
- 3.1.19 NRC Information Notice No. 86-20, "Low Level Radioactive Waste Scaling Factors, 10 CFR 61"

Revision: 9	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 7 of 33

- 3.1.20 NRC Information Notice No. 88-101, "Shipment of Contaminated Equipment Between Nuclear Power Stations"
- 3.1.21 WMG-SW-006, "Computer Software Quality Assurance Program"
- 3.1.22 WMG-QA-001, "Quality Assurance Program"
- 3.1.23 WMG-P-065 "RADMAN Operating Manual"
- 3.1.24 RADMAN Computer Code, Main Topical Report to the USNRC
- 3.1.25 WMG Report #9006, "Computer Program Dose to Curie Methodology Verification and Validation"
- 3.1.26 U.S. Nuclear Regulatory Commission, "Radiological Effluent Technical Specifications for PWRs," NUREG-0472
- 3.1.27 NRC Guidelines for Preparation and Implementation of Solid Waste Process Control Program "DRAFT," Revision 4, October 1986
- 3.1.28 FO-AD-002, "Operating Guidelines for Use of Polyethylene High Integrity Containers"
- 3.1.29 CS-OP-PR-010, "Bead Resin/Activated Carbon Dewatering Procedure for Energy Solutions 14-215 or Smaller Liners, Utilizing Energy Solutions Self-Engaging Dewatering System"
- 3.1.30 NRC Generic Letter No. 91-02, "Reporting Mishaps Involving LLW Forms Prepared For Disposal"
- 3.1.31 WMG-9217, "10 CFR 61 Practice Assessment at Wolf Creek Generating Station, 1992"
- 3.1.32 Letter from Rodney Wingard to Jimmy Still concerning the disposal of dried solids (HP 01-00601)

### **3.2 Commitments**

- 3.2.1 None

### **4.0 DEFINITIONS**

#### **4.1 Abbreviations**

- 4.1.1 Activity/A<sub>2</sub>/g - Package activity divided by (A<sub>2</sub>) divided by gram
- 4.1.2 BTP - Branch Technical Position

- 4.1.3 CNSI - Chem Nuclear System, Inc.
- 4.1.4 RMS - Radioactive Materials Shipper
- 4.1.5 LLD - Lower Limit of Detection
- 4.1.6 MCA - Multi-Channel Analyzer

#### 4.2 Activity Correction Factor

- 4.2.1 The  $\mu\text{Ci/cc}$  or  $\mu\text{Ci/g}$  values may have to be corrected (plus or minus) if the waste stream specific 10 CFR 61 sample results (independent laboratory) and the replicate in-house specific activity values differ by more than 20 percent, and the differences cannot be resolved to the satisfaction of the RMS. Alternatively, the dose-to-curie characterization methodology can be used without applying correction factors.

#### 4.3 As Generated Waste

- 4.3.1 Radioactive waste generated at a frequency contrary to the sampling requirements of waste classes A, B or C.

#### 4.4 Batch

- 4.4.1 An isolated quantity of feed waste to be processed having essentially constant physical and chemical characteristics. (The addition or removal of water will not be considered to create a new batch).

#### 4.5 Chelating Agents

- 4.5.1 EDTA, DTPA, hydroxyl-carboxylic acids, citric acid, carbolic acid and glucinic acid.

#### 4.6 Confirmatory Analysis

- 4.6.1 Verification of Gross radioactivity measurements using MCA and independent laboratory sample data.

#### 4.7 Density Correction

- 4.7.1 Density corrections may be required to convert sample data reported in  $\mu\text{Ci/g}$  to  $\mu\text{Ci/cc}$  or vice versa when comparing sample data with unlike units.

#### 4.8 Dewatered Waste

- 4.8.1 Dewatered Waste refers to wet waste that has been processed by means other than solidification, encapsulation, or absorption to meet the free standing liquid requirements of 10 CFR 61.56 (a) (3) and (b) (2).

#### 4.9 Encapsulation

4.9.1 Encapsulation is a means of providing stability for certain types of waste by surrounding the waste by an appropriate encapsulation media.

#### 4.10 Gamma-Spectral Analysis

4.10.1 Also known as IG, MCA, GE/Li and gamma spectroscopy

#### 4.11 Gross Radioactivity Measurements

4.11.1 More commonly known as Dose to Curies conversion for packaged waste characterization and classification.

#### 4.12 Radiation Protection Radioactive Materials Shipper or RMS

4.12.1 The person designated to sign the shipment manifest and has been trained in the DOT and NRC regulatory requirements within the last three years.

#### 4.13 Homogeneous

4.13.1 Of the same kind or nature; essentially alike. Most waste streams are considered to have the radioactivity distributed throughout for purposes of waste classification.

#### 4.14 Legacy Waste

4.14.1 Radioactive waste generated from past Plant processes.

#### 4.15 Low-Level Radioactive Waste (LLW)

4.15.1 Those low-level radioactive wastes containing source, special nuclear, or by-product material that are acceptable for disposal in a land disposal facility. For the purposes of this definition, low-level radioactive waste has the same meaning as in the Low Level Waste Policy Act, that is, radioactive waste not classified as high-level radioactive waste, transuranic waste, spent nuclear fuel, or by-product material as defined in Section 113.(2) of the Atomic Energy Act (uranium or thorium tailings and waste).

#### 4.16 Measurement of Specific Radionuclides

4.16.1 More commonly known as core sample or package sample using MCA data for packages waste characterization and classification.

#### 4.17 Operable

4.17.1 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

#### 4.18 Pre-qualification Program

4.18.1 The testing program implemented to demonstrate that the proposed method of wet waste processing will result in a waste form acceptable to the land disposal facility.

#### 4.19 QA Verification Sample

4.19.1 A representative sample of the waste that is tested to demonstrate control of the waste processing. The sample shall be obtained from at least every tenth batch of each type of wet radioactive waste processed for stabilization.

#### 4.20 Quality Assurance/Quality Control

4.20.1 As used in this document, "quality assurance" comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service. Quality assurance includes quality control, which comprises those quality assurance actions related to control of the physical characteristics and quality of a material structure, component, or system to predetermined requirements.

#### 4.21 Sampling Plan

4.21.1 A sampling program implemented to ensure that representative samples from the feed waste and the final waste form are obtained and tested for conformance with parameters stated in the PCP and waste form acceptance criteria.

#### 4.22 Scaling Factor

4.22.1 A dimensionless number which relates the concentration of an easy to measure nuclide (gamma emitter) to one which is difficult to measure (beta/alpha emitters).

#### 4.23 Shipping Paper

- 4.23.1 At WCGS the shipping paper consists of an NRC form 540 and 541(or equivalent). Additional documentation may be provided (i.e., bill of lading) but is not consecutively numbered as part of the shipping papers.

#### 4.24 Significant Quantity

- 4.24.1 For purposes of sample evaluation, waste classification and manifesting radionuclides on shipping papers, the following radionuclide limits shall be considered significant:

- o Any LLD value for a 10 CFR Part 20, Appendix G required radionuclide.
- o Any radionuclide representing greater than 5 percent of the relative A2 fraction hazard.
- o Any real value for a radionuclide specifically listed in 10 CFR Part 61.55.
- o Any radionuclide representing greater than 1 percent of the total activity.
- o Any radionuclide greater than 0.5 RQ value.

#### 4.25 Special Nuclides

- 4.25.1 RADMAN Computer Code user term for 10 CFR Part 20, Appendix G required nuclides.

#### 4.26 Stability

- 4.26.1 As used in this document, "stability" means structural stability. Stability requires that the waste form maintain its structural integrity under the expected disposal conditions.

#### 4.27 Waste Container

- 4.27.1 A vessel of any shape, size, and composition used to contain the final or intermediate processed waste.

#### 4.28 Waste Form

- 4.28.1 Waste in a stable waste form or container acceptable for disposal at a licensed disposal facility.

#### 4.29 Waste Processing

- 4.29.1 Changing, modifying, packaging the commercial nuclear power plant generated wet radioactive waste into a form that is acceptable to a disposal facility.

#### 4.30 Waste Stream

- 4.30.1 A station specific and constant source of waste with a distinct radionuclide content and distribution.

#### 4.31 Waste Type

- 4.31.1 A single packaging configuration tied to a specific waste stream, or multiple package types tied to the same waste stream.

### **5.0 RESPONSIBILITIES**

- 5.1 Radiation Protection Radioactive Material Shipper (RMS) is responsible for:

- 5.1.1 Implementing this procedure.
- 5.1.2 Ensuring that radioactive waste is classified and characterized in accordance with 10 CFR 61.55 and receiving facility criteria.
- 5.1.3 Designating other approved procedures (if required) to be implemented in the packaging of any specific batch of waste.



**6.0 PROCEDURE****6.1 The precautions/limitations of this procedure are listed below.**

- 6.1.1 The RADMAN computer code is used for the characterization, classification and shipment of radioactive materials. All plant personnel that have any involvement with the RADMAN computer codes shall be familiar with its functions, operation, and maintenance.
- 6.1.2 Only authorized personnel will characterize or package radioactive waste or radioactive materials.
- 6.1.3 Radioactive materials shall be handled in accordance with applicable Radiation Protection Procedures.
- 6.1.4 Pressure and heat may be encountered during the operation of liquid waste processing systems.
1. Caution must be exercised during disassembly and disconnection of lines or equipment and valve realignments.
- 6.1.5 Each HIC is matched with specific closure components and seals at time of manufacture.
1. All components are identified using a common serial number.
  2. Should components become mismatched, contact the RMS for instructions prior to use.
- 6.1.6 Waste must NOT be packaged for disposal in cardboard or fiberboard boxes.
- 6.1.7 Liquid waste must be solidified or packaged in sufficient absorbent material to absorb twice the volume of the liquid.
- 6.1.8 Solid waste containing liquid shall contain as little free standing and non-corrosive liquid as is reasonably achievable, but in no case shall the liquid exceed 1 percent of the volume in HIC's and 0.5% in a steel liner.
- 6.1.9 Waste must NOT be readily capable of detonation or of explosive decomposition or reaction at normal pressures and temperatures, or of explosive reaction with water.

- 6.1.10 Waste must NOT contain, or be capable of generating, quantities of toxic gases, vapors, or fumes harmful to persons transporting, handling, or disposing of the waste. This does NOT apply to radioactive gaseous waste packaged in accordance with Step 6.1.12 of this section.
- 6.1.11 Waste must NOT be pyrophoric. Pyrophoric materials contained in waste shall be treated, prepared, and packaged to be non-flammable.
- 6.1.12 Waste in a gaseous form must be packaged at a pressure that does not exceed 1.5 atmospheres at 20oC. Total activity must not exceed 100 curies per container.
- 6.1.13 Waste containing hazardous, biological, pathogenic, or infectious material must be treated to reduce to the maximum extent practicable the potential hazard from the non-radiological materials.
- 6.1.14 All data entries should use three significant figures only (i.e., X.XXE-x). **IF** more significant figures are provided, round off to generate three significant figures.
- 6.1.15 Use only those isotopes reported as real values, ignore all isotopes reported as LLD values, except those nuclides listed in Step 6.6.7.
- 6.1.16 Ignore all radioisotopes with half-lives less than eight (8) days based on I-131.
- 6.1.17 Revisions to this procedure shall be documented with form APF 15C-004-01, DOCUMENT REVISION REQUEST and shall contain: (Step 3.1.1)

- o Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s).

AND

- o A determination that the change will maintain the overall conformance of the waste product to existing requirements of Federal, State, or other applicable regulations.

**6.2 Special equipment, material, and parts needed to perform tasks are shown below.**

- 6.2.1 Required tools and equipment will vary depending on the specific process and waste container that is used.

6.2.2 The various tools and equipment, which may be required, are detailed in the vendor procedures listed in Section 3.0.

**6.3 Prerequisites before beginning work with this procedure.**

6.3.1 Ensure that a current set of DOT, NRC and burial site regulations is maintained at the station and is available for reference.

6.3.2 Ensure that representative sample data is on file for each waste stream. Data is considered to be current if it meets the following:

1. The waste stream must be sampled at least every two years for NRC Class A waste.
2. The waste stream must be sampled at least every year for NRC Class B or C waste.  
Exceptions are:
  - a. legacy waste
  - b. as generated waste
3. Non-waste radioactive material shall be sampled on a fuel cycle or as generated basis with (non-irradiated) fuel pool material differentiated from balance of plant material.

6.3.3 The training program shall be developed and implemented for personnel having responsibilities related to waste processing operations to ensure the waste processing shall be performed within the requirements of the PCP.

1. Personnel will be trained to the extent equal to their responsibilities. WCGS credits training provided in accordance with standards or regulations of other federal agencies, such as the Occupational Safety and Health Administration or the Environmental Protection Agency.
2. The training program shall be repeated on a periodic schedule, not to exceed three years.
3. The individual's training records shall be maintained and available for audit and inspection.

6.3.4 Additional requirements for contracted vendors processing waste.

1. Radiation Protection Management shall review vendor(s) topical reports.

**NOTE**

**The PCP does NOT have to include the vendor Topical Report if it has NRC approval, or has been previously submitted to the NRC.**

- a. This review will assure the vendors operations and requirements are compatible with the responsibilities and operation of the plant.
- b. The training requirements and records listed in Step 6.3.3 also apply to contracted vendors.
- c. The station shall maintain copies of records to verify training of vendor personnel.

**6.4 Procedure For Performing Work**

6.4.1 Methods and frequency for determining the radionuclide concentration for each waste stream.

1. Ensure samples are representative of the final waste form.
2. Determine the base line density for each waste stream (NOT applicable for DAW and filters). The density is determined by waste weight and volume.

**NOTE**

**For WCGS, waste stream radionuclide content is considered to be distributed throughout for purpose of waste classification.**

6.4.2 Treat each waste stream separately for classification purposes.

- 6.4.3 Send all NRC Class A waste samples to an independent laboratory for gamma, beta and alpha analysis at least once every two years.
1. Perform an in-house analysis for gamma emitting radionuclides for each sample sent to an independent lab for future comparison.
  2. Periodically perform in-house analysis for gamma emitting nuclides for comparison to the current data base values for gamma emitters (the current data base is usually based on the most recent independent laboratory results).
- 6.4.4 Send all NRC Class B and C waste samples to an independent laboratory for gamma, beta and alpha analysis at least once a year, except as defined in 6.3.2. The additional steps required are identical to substeps 1 and 2 of Step 6.4.3.
- 6.4.5 Determine the status (real value, LLD or not present) of the 10 CFR 20 Appendix G required nuclides for each waste stream from the recent independent laboratory data.
- 6.4.6 Document and track all samples per RPP 07-101, CONTROL OF RADIOACTIVE MATERIAL MANAGEMENT SOFTWARE AND DATA BASES
- 6.4.7 Sample periodicity adjustment should be based on the conditions outlined in Step 6.8.

**6.5 Current and planned practice for each waste stream is as follows:**

- 6.5.1 DAW
1. Obtain composite smears from various contaminated areas of the plant periodically or at a minimum biennially and analyze (IG) them in-house for gamma emitters.
  2. Compare the results of the samples to the database to ensure adequacy of sample frequency.
  3. Send the most recent group of composite smears to an independent laboratory for analysis biennially or more often. **IF** determined necessary by RMS.
  4. Maintain records for all samples for nuclide identification, distribution and scaling factors.

**NOTE**

The specific activity ( $\mu\text{Ci}/\text{cc}$  or  $\mu\text{Ci}/\text{g}$ ) is NOT required since all characterization/classification calculations are performed using a dose/curie methodology which only relies on fractional abundance.

5. Both in-house and independent laboratory results are normally reported in  $\mu\text{Ci}/\text{sample}$ .
6. Forward the results from the independent laboratory to the HP Dosimetry/Calibration Lab for evaluation on RPF 01-405-05, "DETERMINATION OF DETECTABLE VS. NON-DETECTABLE ACTIVITY FOR RELEASE FROM THE RCA".

6.5.2 CVCS Resin

1. Obtain several composite samples from the resin transfer line during liner loading operations.

**NOTE**

Each liner is considered a different batch for sampling and classification purposes.

2. Analyze the samples in-house (IG) and retain the results for future comparison to the replicate independent laboratory results.
3. Send the samples to an independent laboratory for analysis annually or as generated.
4. Maintain records for all samples for nuclide identification, distribution and scaling factors.
5. Both in-house independent laboratory results are normally reported in the same units ( $\mu\text{Ci}/\text{g}$  or  $\mu\text{Ci}/\text{cc}$ ).

6.5.3 Filters

1. Obtain samples from each individual filter waste stream defined in Step 2.2.

**NOTE**

Samples may be taken from the actual filter media, from a smear of the filter media, from a smear of the filter housing, or a crud sample, as determined by the RMS. The preferred method is the crud sample.

2. Perform an in-house (IG) analysis of the sample (or replicate sample) and retain the output record for future comparison to the independent laboratory results.
3. Send the sample to an independent laboratory for analysis annually or more often if determined to be necessary by the RMS.
4. Maintain records for all samples for nuclide identification, distribution and scaling factors.

**NOTE****CORRECTIVE ACTION FOR ADJUSTING Co-58 SCALING FACTORS FOR FILTERS DURING CRUD BURSTS ENCOUNTERED WITH CHEMICAL INJECTIONS AND 100% LOAD REJECTIONS**

5. The Co-58 scaling factors should be adjusted when the total radioactivity increases for filters during the above conditions, the activity increase is primarily Co-58 not Co-60, if the scaling factors are not adjusted the filters can be overestimated for NRC waste classification.
  - a. Step 1, Obtain a filter sample.
  - b. Step 2, Count the sample in-house, it is not necessary to perform an independent laboratory analysis.
  - c. Step 3, Divide the Co-58 value by the Co-60 value, this is the scaling factor.
  - d. Step 4, Obtain a hard copy of the Part 61 filter waste stream.
  - e. Step 5, Apply the Step 3 scaling factor to the database Co-60 value.

f. Step 6, Create a new (crud burst) Part 61 waste stream with the new Co-58 value.

g. Step 7, Characterize filters.

#### NOTES

- o Document that there are two Part 61 waste streams for the same filters depending on operating conditions.
- o The specific activity ( Ci/cc or Ci/g) is not required since all characterization/classification calculations are performed using a dose/curie methodology which only relies on fractional abundance.

6. Both in-house and laboratory results are normally reported in  $\mu\text{Ci}/\text{sample}$ .

#### 6.5.4 Tubular Ultra Filtration/Reverse Osmosis Waste

1. Obtain a sample from the waste stream on an annual or as generated basis.
2. Perform an in-house (IG) analysis of the sample (or replicate sample) and retain the output record for future comparison to the independent laboratory results.
3. Send the sample to an independent laboratory for analysis once per year or more often if determined to be necessary.
4. Maintain records for all samples for nuclide identification, distribution and scaling factors.

### 6.6 Sample Evaluation

#### 6.6.1 Infrequent or Abnormal Waste Types

1. Infrequent or abnormal waste types that may be generated must be evaluated on a case-by-case basis.
2. The RMS will determine if the waste can be correlated to an existing waste stream.
3. If the radioactive material cannot be correlated to an existing waste stream, the RMS shall determine specific off-site sampling and analysis requirements necessary to properly classify the material.



- 6.6.2 Examples of these radioactive materials include, but are not limited to:
- o Contaminated Soil
  - o Contaminated Oil
  - o Special Filters or Resin
  - o A mixture of radioactive material types in one container.
- 6.6.3 Requirements for analysis to be performed by an off site vendor are as follows:
1. All sample results must reference the matrix received.
  2. All sample results shall be decay corrected to a reference date provided by the station which is normally the sample date.
  3. The sample results shall be reported in  $\mu\text{Ci}/\text{sample}$ ,  $\mu\text{Ci}/\text{g}$  or  $\mu\text{Ci}/\text{cc}$ .

**NOTE**

**Outside analysis is NOT required for any radionuclides with a half life less than eight days.**

- 6.6.4 The vendor shall perform analysis for the following radionuclides listed in Table 1 of 10 CFR 61.55.
1. C-14, Tc-99, I-129, Pu-241, Cm-242 and the following alpha emitting transuranics (TRUs) with half-lives greater than five years, Np-237, Pu-238, Pu 239/240, Pu-242, Am-241, and Cm 243/244.
    - a. Additionally Ni-59 and Nb-94 are required for Rx cavity and fuel pool filters.

**NOTE**

If evaluation of several sets (i.e., three or more) of waste stream specific historical sample data shows that some TRUs with half-life greater than five years are consistently reported as LLD values, sample analysis may be discontinued for those specific radionuclides.

2. Analysis for the "activated metal" radionuclides listed in Table 1 of 10 CFR Part 61 are only required for the fuel pool filters and reactor cavity filters waste streams identified at WCNOG.
  3. It is NOT necessary to contract for an offsite vendor to perform analysis for enriched uranium or other naturally occurring radionuclides not delineated in this procedure.
  4. Radionuclides listed in Table 1 of 10 CFR 61.55 shall be specifically identified and the quantities reported on shipping manifests if they are significant for purposes of classification.
- 6.6.5 The vendor shall perform analysis for the following radionuclides listed in Table 2 of 10 CFR 61.55.
1. H-3, Co-60, Ni-63, Sr-90 and Cs-137
  2. Radionuclides listed in Table 2 of 10 CFR 61.55 shall be specifically identified and the quantities reported on shipping manifests if they are significant for purposes of classification.
- 6.6.6 The vendor shall perform analysis for the following radionuclides NOT listed in Table 1 or Table 2 of 10 CFR 61.
1. Activation Products - Cr-51, Mn-54, Fe-55, Co-58, Fe-59, Sb-124, Sb-125, Zn-65, Ag-110M and any other nuclides identified in significant quantities by in-house IG equipment.
  2. Fission Products - Zr-95, Nb-95, Ru-103, Ru-106, Cs-134, Ce-141, Sr-89, Ce-144 and any other nuclides identified in significant quantities by in-house IG equipment.

6.6.7 A waste stream specific database must include the following radionuclides, even if they are reported as LLD values:

1. H-3, C-14, Tc-99, I-129 required by 10 CFR 20 Appendix G (H-3 is considered real or LLD for DAW because "not present" cannot be substantiated).
2. Co-60, Cs-137, and Ce-144 (only if TRUs are reported) required by the RADMAN computer code. They are used as the primary scaling radionuclides.
3. The RMS can change the base scaling radionuclides.

**NOTE**

**Samples sent to offsite laboratories for analysis should contain sufficient activity to determine the presence of transuranic nuclides. The minimum recommended sample activity level is 50,000 dpm. If that level cannot be attained, the highest activity should be used for offsite analysis.**

**6.7 Sample Analysis and Comparison**

- 6.7.1 Whenever a sample is sent off-site for analysis, count the same sample (or replicate) in-house with the station IG system.

**NOTE**

**Isotopic results that are not considered statistically positive at the 99.9% confidence level are considered "suspect" values and shall be discarded as necessary.**

- 6.7.2 Comparison of on-site versus off-site analysis shall be evaluated to identify and resolve any discrepancies. As a minimum, the comparison shall include:
- o Specific activity by gamma emitting radionuclides. (NOT applicable for DAW or filter samples.)
  - o Co-60/Cs-137 Ratio
  - o Presence or absence of radionuclides
  - o Predominant radionuclides
  - o Individual radionuclide fractional abundance
  - o Scaling factors
- 6.7.3 Records of on-site and off-site sample analysis and evaluations by waste stream are maintained by the RMS.
- 6.7.4 **IF** a comparison between the in-house and independent laboratory results shows a variance of 20 percent or greater for specific activity, the MCA results may be adjusted until the discrepancy is resolved. Reported MDC should be consistent with the measurement uncertainty. The relative uncertainty (1) of the measurement should be ~30% at the MDC and should get smaller as the measured concentration increases above the MDC level.
1. Any discrepancies should be resolved (if possible) in-house or with the independent laboratory as soon as possible.
  2. The use of these activity correction factors is only valid if other conditions defined in Step 6.7.2 above compare favorably, otherwise the sample set should be considered suspect and the data should not be used. This would require another sample as soon as possible.
- 6.7.5 Radionuclides with a half-life less than eight days are also ignored from internal MCA reports.

Revision: 9	SOLID RADWASTE PROCESS CONTROL PROGRAM	AP 31A-100
Information Use		Page 25 of 33

- 6.7.6 New sample data shall be periodically obtained and evaluated.
- 6.7.7 New sample data may be either off-site analysis or in house MCA analysis.
- 6.7.8 Once a database has been established, based on off site analysis, the MCA results are primarily used as a "flag" to obtain and send additional samples off site. Exceptions to this may occur during crud burst situations where it is necessary to adjust the scaling factor relationship of the activation products. An example would be the  $^{58}\text{Co}/^{60}\text{Co}$  ratio after hydrogen peroxide additions.
- 6.7.9 The RADMAN analyze utility program may be utilized to evaluate multiple sets of data.

**NOTE**

**Isotopic results that are NOT considered statistically positive at the 99.9% confidence level are considered "suspect" values and shall be discarded as necessary.**

- 6.7.10 Several comparisons to the existing database shall be considered when evaluating new sample data.
1. Radionuclide fractional abundance and scaling factor relationships
  2. Specific activity by radionuclide
  3. Swings in driving classifications radionuclides
  4. Radionuclides present in database, but NOT present in new sample or vice versa
  5. Total activity by sample set

**6.8 Sample Frequency**

6.8.1 The following may require increased sampling:

1. Increase in failed fuel fraction as determined by:
  - o D.E.I. 25% of Technical Specification limit
  - o Increase of I-131/I-133
  - o Np-239 greater than 0.01  $\mu\text{Ci/cc}$  in reactor coolant
  - o Significant increase in gross alpha sample results on any type of smear survey
2. Crud burst during 100% load rejection or chemical cleaning
3. Extended reactor shutdown (>90 days)
4. Changes to liquid waste processing, such as bypassing filters, utilizing filters or a change in ion exchange media

**6.9 Scaling Factors**

- 6.9.1 WCGS has established an inferential measurement program, whereby, concentrations of radioisotopes which cannot be readily measured are estimated through ratioing to concentrations of radioisotopes which can be readily measured.
- 6.9.2 Scaling factors have been developed on a facility and waste stream specific basis, and are periodically confirmed through direct measurements.
- 6.9.3 Correlations between measured and inferred radionuclides are currently as follows, but can be changed at RMS discretion:
1. Ce-144 to transuranic nuclides
  2. Co-60 to activation product nuclides and C-14
  3. Cs-137 to fission product nuclides

**6.10 Waste Classification**

- 6.10.1 Determine the waste classification (Class A stable or unstable, Class B, Class C) by the concentration of certain radionuclides in the final waste form as listed in 10 CFR 61.55.

6.10.2 Determine the radionuclide concentrations per RPP 07 123 PREPARATION

AND SHIPMENT OF RADIOACTIVE WASTE  
AND MATERIAL, as follows:

1. DAW - "Gross Radioactivity Measurements" in conjunction with the RADMAN computer code or hand calculations
2. Filters - "Gross Radioactivity Measurements" in conjunction with the FILTRK computer code or hand calculations
3. All other waste streams - "Direct Measurement of Individual Radionuclides" in conjunction with the RADMAN computer code or hand calculations

#### **6.11 Quality Control For Sampling And Classification**

6.11.1 The RADMAN computer code provides a mechanism to assist WCGS in conducting a quality control program to aid in compliance with the waste classification requirements listed in 10 CFR 61.55.

6.11.2 Management audits of the WCNOG Sampling and Classification Program shall be performed in accordance with the approved self assessment schedule.

6.11.3 The audits are performed and documented by any of the following:

- \* Radiation Protection Department
- \* Subject Matter Experts
- \* Quality Assurance Department
- \* Qualified Vendors

#### **6.12 Non-Waste Classification**

6.12.1 Determine the radioactive material classification (Excepted Package, LSA, SCO, Type A, >Type A or Type B) by the total activity or activity as listed in DOT regulations and the receiver's radioactive material licenses.

6.12.2 Determine the radionuclide concentrations per RPP 07-123, PREPARATION AND SHIPMENT OF RADIOACTIVE WASTE AND MATERIAL, as follows:

1. Non-irradiated material removed from the spent fuel pool - "Gross Radioactivity Measurements," "Direct Measurement of Individual Radionuclides", or "Measurement of Surface Contamination Levels" for non-radioactive material contaminated with radioactive material in conjunction with the RADMAN computer code or hand calculations.
2. Any other radioactive material generated by the station - The same methods listed for fuel pool material may be used with a separate radionuclide database.

### 6.13 Processing General Requirements

**NOTE**

**The dewatering capabilities are verified by vendor Topical Reports or operating and testing procedures.**

6.13.1 Verify the wastes contain only trace amounts of drainable liquid, and in NO case may the volume of free liquid exceed one percent of the waste volume when wastes are disposed of in containers designed to provide stability.

**NOTE**

**The following verification is performed on a case-by-case basis for each package using independent laboratory data and MCA data in conjunction with computer codes or hand calculations.**

6.13.2 Verify that resins are NOT processed that have loadings which will produce greater than 1.0 E+8 rads (350 Ci/cc) total accumulated dose. This only applies to two radionuclides, Cs-137 and Sr-90.

6.13.3 The as generated waste must be compatible with the disposal container.



**6.14 Processing Requirements During Dewatering Operations**

- 6.14.1 Perform all dewatering operations per RPP 07 131, Bead Resin/Activated Carbon Dewatering Procedure for Energy Solutions 14-215 or Smaller Liners, Utilizing Energy Solutions Self-Engaging Dewatering System"

**NOTE**

**This procedure may only be used to dewater Energy Solutions 14-215 or smaller liners containing bead-type ion exchange resins and activated carbon with less than 1 percent oil.**

- 6.14.2 Complete form RPF 07-131-01, HIC DEWATERING COMPLETION RECORD, for direct disposal liners prior to final closure.
- 6.14.3 Form RPF 07-131-01, HIC DEWATERING COMPLETION RECORD, must be included in the shipping paperwork package with the shipment.
- 6.14.4 The final transfer/dewatering cycle shall be counted as the first pumping cycle **IF** after the transfer is completed, the liner is dewatering per this procedure.
- 6.14.5 Final dewatering verification is determined by the following:
1. 1% Free-Standing Water or Less
    - a. After a minimum of three pumping cycles for bead resins or six cycles for activated carbon, a measured volume of less than five gallons on the next eight hours of pumping shall be the acceptance criteria.
    - b. **IF** five gallons or more are collected, the waiting/pumping cycle shall be repeated until less than five gallons are collected.
  2. 0.5% Free-Standing Water or Less
    - a. After a minimum of six pumping cycles for bead resins or nine pumping cycles for activated carbon, a measured volume of less than two gallons on the next eight hours of pumping shall be the acceptance criteria.

- b. **IF** two gallons or more are collected, the waiting/pumping cycle shall be repeated until less than two gallons are collected.

#### 6.15 Packaging General Requirements

##### NOTE

The following general requirements are normally verified by review of a HIC's Certificate of Compliance (C of C) and State/NRC approval.

- 6.15.1 Ensure that the waste is in a container or structure that provides stability after disposal.
- 6.15.2 Ensure that the container is resistant to degradation caused by radiation effects.
- 6.15.3 Ensure the container is resistant to bio-degradation.
- 6.15.4 Verify that the container will remain stable under the compressive loads inherent in the disposal environment.
- 6.15.5 Verify that the container will remain stable if exposed to moisture or water after disposal.
- 6.15.6 Ensure that the "as generated" waste is compatible with the container.

#### 6.16 Packaging Vendor Requirements

- 6.16.1 Perform all inspection, handling and loading operations per vendor procedure, FO-AD-002.
- 6.16.2 **IF** required, complete form FO-AD-002 HIC USER'S CHECKLIST, for each HIC liner and transmit it to the vendor. Maintain a copy on file.
- 6.16.3 Include Form FO-AD-002 HIC USER'S CHECKLIST, in the shipping paperwork package with the shipment as required.

## 6.16.4 Storage Conditions

**NOTES**

- o Containers stored out-of-doors in direct sunlight must be used within one year of fabrication.
- o The design of the storage facility must preclude the possibility of a wet or damp environment and any prolonged exposure of the container to any source of ultraviolet light.

1. Ensure that containers are stored out of direct sunlight (if possible) and away from any other sources of ultraviolet radiation.
2. Store all containers in such a way that the bottom is flat and that no weight is located over the manway/fill port area.
3. Each container shall be stored with its designated closure assemblies to prevent mismatching.
4. Following filling and closure of the container, it may be stored on-site prior to shipment for burial.

## 6.16.5 Inspection Prior To Use

1. Visually inspect thread and seal areas to verify they are free of foreign matter that could impair the seal or thread engagement.
2. Visually inspect the exterior surfaces for damage that may have occurred during transport or storage that could lessen container integrity.

## 6.16.6 Handling and Lift Requirements

**NOTE**

Due to the nature of the container material, some bowing and deformation may be evident during lifting.

1. Use only lift band(s), lift lugs and slings provided with the liner for lifting.

2. Inspect the underdrain assembly prior to use if the container was dropped or banged against another object.

#### **6.17 Additional Energy Solutions Containerized Waste Facility Requirements**

- 6.17.1 Each package of waste must be clearly labeled to identify whether it is Class A, Class B, or Class C waste, in accordance with 10 CFR 61.55.
- 6.17.2 All waste received at the CWF facility must be disposed in approved disposal overpacks.
- 6.17.3 Void spaces within the waste and between the waste and its packaging shall be reduced to the extent practicable, but in NO case shall the container less than 215 cubic foot be less than eighty-five percent (85%) full.

#### **NOTE**

**The acceptable void space depends upon the volume of the disposal container. This criteria is outlined in the Energy Solutions Waste Acceptance Criteria.**

- 6.17.4 RMS must apply for a variance request prior to shipment for any container not meeting the acceptance criteria.

#### **7.0 RECORDS**

- 7.1 The following QA Records are generated by this procedure.
  - 7.1.1 Completed HIC USER'S CHECKLIST (FO-AD-002)
  - 7.1.2 Completed CERTIFICATION STATEMENT FOR DISPOSAL OF POLYETHYLENE HIGH INTEGRITY CONTAINERS (FO-AD-002)
- 7.2 The following Non-QA Record is generated by this procedure.
  - 7.2.1 Completed POLYETHYLENE HIGH INTEGRITY CONTAINER CERTIFICATION STATEMENT (FO-AD-002)

#### **8.0 FORMS**

- 8.1 FO-AD-002, ATTACHMENT 1, HIC USER'S CHECKLIST
- 8.2 FO-AD-002, ATTACHMENT 2, CERTIFICATION STATEMENT FOR DISPOSAL OF POLYETHYLENE HIGH INTEGRITY CONTAINERS
- 8.3 FO-AD-002, ATTACHMENT 3, POLYETHYLENE HIGH INTEGRITY CONTAINER CERTIFICATION STATEMENT

ATTACHMENT A  
(Page 1 of 1)

## TECHNICAL REQUIREMENTS (SECTION 5.5.4)

Process Control Program (PCP)

The PCP shall contain the current formulas, sampling, analyses, test, and determinations made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

## Changes to the PCP:

1. Shall be document and records of reviews performed shall be retained as required by the Quality Program Manual Section 17.9. This documentation shall contain:
  - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  - b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
2. Shall become effective after review and acceptance by the Plant Safety Review Committee and the approval of the Plant Manager.

-END-