



Technical Specification 6.9.1.8 (Salem)
Technical Specification 6.9.1.7 (Hope Creek)

LR-N20-0025

April 27, 2020

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington DC 20555-001

Salem Nuclear Generating Station, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Hope Creek Generating Station
Renewed Facility Operating License No. NPF-57
NRC Docket No. 50-354

Subject: 2019 Annual Radioactive Effluent Release Report (RERR)

As required with Section 6.9.1.8 of Appendix A to Renewed Facility Operating License Nos. DPR-70 (Unit 1) and DPR-75 (Unit 2) for Salem Nuclear Generating Stations (SGS), and Section 6.9.1.7 of Appendix A to Renewed Facility Operating License NPF-57 for Hope Creek Generating Station (HCGS), PSEG Nuclear hereby transmits one (1) copy of the combined 2019 Annual Radioactive Effluent Release Report (Enclosure 1). Reports SGS RERR-68 and HCGS RERR-42 were combined into one (1) report that summarizes information pertaining to the releases of radioactive materials in liquid, gaseous and solid form from the SGS and the HCGS for the period January 1, 2019 to December 31, 2019.

There are no regulatory commitments contained in this letter.

If you have any questions or comments on this transmittal, please contact Mr. Rick Heathwaite at (856) 339-2076.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Sharbaugh".

David L. Sharbaugh
Plant Manager
Salem Generating Stations

A handwritten signature in black ink, appearing to read "S. Poorman".

Steven R. Poorman
Plant Manager
Hope Creek Generating Station

Enclosure 1: 2019 Annual Radioactive Effluent Release Report for Salem and Hope Creek
Generating Stations



PSEG Nuclear

**Salem and
Hope Creek
Generating
Stations**

**2019 ANNUAL RADIOACTIVE
EFFLUENT RELEASE REPORT
JANUARY 1 THROUGH DECEMBER 31, 2019**

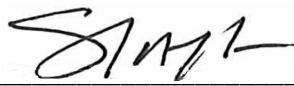
**Radioactive
Effluent
Controls**


SGS RERR-68		HCGS RERR-42	
Unit 1 DOCKET NO 50-272 OPERATING LICENSE NO DPR-070	Unit 2 DOCKET NO 50-311 OPERATING LICENSE NO DPR-075	Unit 1 DOCKET NO. 50-354 OPERATING LICENSE NO. NPF-057	


Report Prepared by:  **Date** 04/06/2020
Rick Heathwaite (REMP/REC Program Manager)

Station Reviews and Approvals

Salem

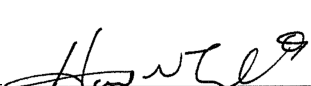
 Date 4/20/20
Shane Howe (R.P. Manager)

 Date 04/12/20
William Gropp (Chem. Manager)

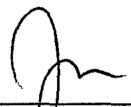
 Date 4/16/20
Richard DeSanctis (Sr. Dir. Operations)

 Date 4/11/20
David Snarbaugh (Plant Manager)

Hope Creek

 Date 4-16-20^e
Harold Trimble (RP Manager)

 Date 4/20/20
Ronald Rattigan (Chem. Manager)

 Date 4/24/20
James Priest (Sr. Dir. Operations)

 Date 4/16/20
Steven Poorman (Plant Manager)

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I. Executive Summary

In 2019, Salem Generating Station (SGS) Unit 1 and Unit 2 and Hope Creek Generating Station (HCGS) Unit 1 released to the environment through the radioactive liquid and gaseous effluents 32.15 curies of noble gas, 0.04 curies of fission and activation products, and 2,286 curies of tritium. The dose from both liquid and gaseous effluents was conservatively calculated for the Maximum Exposed Member of the Public. The results of those calculations and their comparison to the allowable limits were as follows:

Gaseous and liquid radiation doses to members of the public at the highest dose receptor							
Effluent	Applicable Organ	Estimated Dose	Age Group	Receptor Location	% of Applicable Limit	Limit	Units
Noble Gas	Gamma – Air Dose	3.36E-04	All	Site Boundary	0.11%	30	mRad
	Beta – Air Dose	1.42E-04			0.02%	60	
Iodine, Particulate, C-14 & Tritium	Bone	3.22E-01	Child	4.6 miles SW	0.72%	45	mrem
Liquid	Total Body	1.83E-02	Adult	0.75 mi. N of Salem	0.41%	9	mrem
	Gi-Li	4.51E-02			0.15%	30	

The calculated doses from the radiological effluents released from the three units were a very small percentage of the allowable limits.

The Total Dose to the Critical Receptor as required by section 3.11.4 of the SGS and HCGS ODCMs was determined to be 5.69E-01 mrem (Table 6). The dose calculated was below the limits of 40 CFR 190 and 10 CFR 72.104 (25 mrem) to the total body and critical organ other than the thyroid.

Maximum TEDE doses to groups of Members of the Public (Sewage Treatment Plant Worker and Security Checkpoint) not having access to the Radiologically Controlled Area (RCA) were calculated as 2.47E+00 mrem and 2.90E-02 mrem, respectively (Table 7). These doses were a small fraction of the 10 CFR 20.1301 dose limit of 100 mrem.

II. Introduction

This report, SGS-RERR-68/HCGS-RERR-42, summarizes information pertaining to the releases of radioactive materials in liquid, gaseous and solid forms from SGS and HCGS for the period January 1, 2019, to December 31, 2019.

SGS Unit 1 is a Westinghouse Pressurized Water Reactor that has a licensed core thermal power rating of 3,459 MW_{th} and an approximate net electrical output of 1,180 MW_e. SGS Unit 1 achieved initial criticality on December 11, 1976, and began commercial operation on June 30, 1977.

SGS Unit 2 is a Westinghouse Pressurized Water Reactor that has a licensed core thermal power rating of 3,459 MW_{th} and an approximate net electrical output of 1,178 MW_e. SGS Unit 2 achieved initial criticality on August 2, 1980, and began commercial operation on October 13, 1981.

HCGS is a General Electric Boiling Water Reactor that has an up rated core thermal power rating of 3,902 MW_{th} and an approximate net electrical output of 1,212 MW_e. The HCGS achieved initial criticality on June 28, 1986 and began commercial operation on December 20, 1986.

This report complies with the format described 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, as required by Control 6.9.1.8 of the SGS Units 1 and 2 Offsite Dose Calculation Manual (ODCM) and Control 6.9.1.7 of the HCGS ODCM. Revision 2, June 2009 of this Guide permits data tables to be supplied as annual tables.

Meteorological data was obtained in the format specified in Regulatory Guide 1.23, Revision 1 "Meteorological Monitoring Programs for Nuclear Power Plants," and retained on site. Detailed meteorological data was not presented in this report.

All vendor results for samples obtained in 2019 were received and included in the report calculations. Therefore, the 2019 report is complete and no supplements to the 2019 evaluating period will be required.

III. Supplemental Information

1. Regulatory Limits

The same regulatory limits apply to SGS Unit 1, SGS Unit 2 and HCGS. The limits were as follows:

Limit	Units	Receptor	ODCM and 10 CFR 50, Appendix I Design Objective Limits
1. Noble Gases:			
a.	≤ 500	mrem/yr	Total Body
	≤ 3000		Skin
b.	≤ 5	mRad	Air Gamma
	≤ 10		Air Beta
c.	≤ 10	mRad	Air Gamma
	≤ 20		Air Beta
d.	≤ 10	mrem	Total Body (Gamma)
	≤ 30		Skin (Beta)
2. Iodines, Tritium, Particulates with Half-Lives > 8 days:			
a.	≤ 1500	mrem/yr	Any Organ
b.	≤ 7.5	mrem	Any Organ
c.	≤ 15	mrem	Any Organ

Limit	Units	Receptor	ODCM and 10 CFR 50, Appendix I Design Objective Limits
3. Liquid Effluents			
a.	The concentration limits in 10 CFR 20, Appendix B, Table II Col. 2 (pre 1994). For dissolved or entrained noble gases, the concentration shall be limited to 2E-04 uCi/ml.		ODCM Control 3.11.1.1
b.	≤ 1.5	mrem	Total Body
	≤ 5		Any Organ
			Quarterly dose limits ODCM Control 3.11.1.2.a
c.	≤ 3	mrem	Total Body
	≤ 10		Any Organ
			Yearly dose limits ODCM Control 3.11.1.2.b
4. Total Dose Limits			
a.	≤ 25	mrem	Total Body or Organ
	≤ 75		Thyroid
			Yearly dose limits ODCM Control 3.11.4 40 CFR 190 and 10 CFR 72.104
b.	≤ 100	mrem	Site TEDE Dose
			10 CFR 20.1301

2. Maximum Permissible Concentration (MPC) Limits

Gaseous dose rate limits rather than maximum permissible concentration limits were used to calculate permissible release rates for gaseous releases. The maximum permissible dose rates for gaseous releases were defined in ODCM Controls 3.11.2.1.a and 3.11.2.1.b.

The Maximum Permissible Concentration Limit specified in 10 CFR 20, Appendix B, Table II, Column 2 (pre 1994) for identified nuclides, were used to calculate permissible release rates and concentrations for liquid release in accordance with the SGS Unit 1 and Unit 2 and the HCGS Offsite Dose Calculation Manual Control 3.11.1.1. The total activity concentration for all dissolved or entrained gases was limited to < 2.00E-04 uCi/ml.

3. Average Energy

The SGS ODCM and the HCGS ODCM limit the instantaneous dose equivalent rates due to the release of noble gases to less than or equal to 500 mrem/year to the total body and less than or equal to 3,000 mrem/year to the skin. The average beta and gamma energies of the radionuclide mixture in releases of fission and activation gases as described in Regulatory Guide 1.21, "Measuring, Evaluation, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," may be used to calculate doses in lieu of more sophisticated software. The SGS and HCGS radioactive effluent programs employ the methodologies presented in U.S. NRC Regulatory Guide 1.109 "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978. Therefore, average energies were not applicable to SGS and HCGS.

4. Measurements and Approximations of Total Radioactivity

A. Liquid Effluents:

Liquid effluents were monitored in accordance with Table 4.11-1 of the SGS ODCM and Table 4.11.1.1.1-1 of the HCGS ODCM.

During 2019, all routine batch liquid wastes were routed to sampling tanks for monitoring prior to release. The ODCMs require these tanks to be uniformly mixed for sampling and analysis before being released.

Batch releases were defined as:

- For SGS, releases from the Service Water Drums, which were collected and disposed via the Chemical Waste Basin, and the Chemical Volume Control System (CVCS) Monitor Tanks. During 2019, all batch liquid wastes from the Chemical Drain Tank and Laundry and Hot Shower Tanks were routed to Waste Monitor Holdup Tanks for monitoring prior to release. For flexibility in processing liquid effluents, the SGS Units 1 and 2 Liquid Radwaste Systems were cross-connected.
- For HCGS, releases from the Equipment Sample Tanks, Floor Drain Sample tanks, and Detergent Drain Tanks and Condensate Storage Tank Dike.

Continuous releases were defined as:

- For SGS, continuous liquid release pathways include Secondary System Leakage from the Condensate system and the Unit 1 Groundwater Recovery System through the Chemical Waste Basin.
- For HCGS, a continuous liquid effluent release path exists through the Circulating Water Dewatering Sump Discharge.

Representative samples were obtained in accordance with Table 4.11-1 of the SGS ODCM for SGS and Table 4.11.1.1.1-1 of the HCGS ODCM for HCGS. The total liquid activity discharged was determined by multiplying specific activities from the analyses by the volume of effluent discharged to the environment.

The detection requirements of Table 4.11-1 (SGS) and Table 4.11.1.1.1-1 (HCGS) of the ODCM were achieved. Radionuclides that were measured at concentrations below the ODCM-specified lower limit of detection (LLD) were considered present. A radionuclide for which no activity was detected while meeting the required LLD was considered absent.

B. Gaseous Effluents:

SGS Units 1 and 2:

Gaseous effluent streams at SGS were monitored and sampled in accordance with Table 4.11-2 of the ODCM. Each plant vent was the final release point for planned gaseous effluent releases and was continuously monitored by installed radiation monitors. The vent was also continuously sampled for iodine and particulates with fixed particulate and charcoal filters. The filter and charcoal were normally changed weekly, and analyzed on a multi-channel analyzer.

Sampling was also performed on all gas decay tanks and the containment atmosphere prior to release to the environment. The plant vent for each unit was normally sampled weekly for noble gases, particulates, iodine, and tritium.

The detection requirements of Table 4.11-2 of the ODCM were achieved. A positive detection of a radionuclide a concentration below the ODCM LLD was considered present. A radionuclide for which no positive activity was detected while meeting the required LLD was considered absent. Only plant produced radionuclides were reported in this report.

Continuous gaseous releases were quantified by routine sampling and isotopic analyses of the plant vent for each unit, as required by the ODCM. Specific activities for detected isotopes

were multiplied by the total vent flow volume for the entire sampling period in order to determine the normal continuous release of radioactivity through each plant vent.

Batch noble gas releases were quantified by sampling each waste gas decay tank, pressurizer relief tank, reactor coolant drain tank, volume control tank or by containment atmosphere prior to release. The total activity in a batch release was determined by multiplying the specific activities for detected isotopes by the total volume of the gas discharged in that batch release.

Elevated plant vent radiation monitoring system readings while the channel was in an alarm state were treated as batch mode releases. If specific activity data from grab samples were not available, then the release was quantified by the use of the plant vent radiation monitors. The monitor response was converted to "specific activity" using historical efficiency factors. The total activity discharged was determined by multiplying the "specific activity" by the volume of effluent discharged while the channel was in an alarm state.

HCGS:

Gaseous effluent streams at HCGS were monitored and sampled in accordance with Table 4.11.2.1.2-1 of the ODCM. The North Plant Vent (NPV) and South Plant Vent (SPV) were the final release points for planned gaseous effluent releases. The NPV and SPV were continuously monitored for iodine, particulates and noble gases. These monitors have fixed particulate and charcoal filters. The particulate filters and charcoal cartridges were normally replaced and analyzed weekly. These analyses were performed on a multi-channel analyzer. The NPV and SPV were also normally sampled weekly for noble gases and tritium.

A small quantity of gaseous effluent was released via the Filtration, Recirculation, and Ventilation System (FRVS) vent during FRVS testing periods. The FRVS was continuously monitored for noble gases when in service, and has fixed particulate and charcoal filters. When the system was in vent mode for greater than two hours, samples were collected at the end of the release period. During periods of extended runs, samples were normally taken weekly.

A small quantity of gaseous tritium was released via the Turbine Lube Oil Vapor Extraction (TLOVE) system. The TLOVE is comprised of the 3-inch Reactor Feedwater Pump Turbine (RFPT) Vent Line, 3-inch and 10-inch Generator Hydrogen Seal Oil (GHSO) Vent Lines, and the 8-inch Main Turbine Lube Oil (MTLO) Vent Line.

The detection requirements of Tables 4.11.2.1.2-1 of the ODCM were achieved or exceeded. A radionuclide detected at a concentration below the ODCM LLD was considered present. A radionuclide for which no activity was detected while meeting the required LLD was considered absent.

Batch noble gas releases (i.e. primary containment purge) were quantified by pre-release sampling and isotopic analysis. The total radioactivity released was estimated by multiplying the specific activities for detected isotopes by the containment volume.

The SGS and HCGS ODCMs required LLD for airborne and liquid releases were as follows:

Liquid	LLD (uCi/ml)
Principal Gamma Emitters: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141	5E-07
Ce-144 – HCGS	5E-06
Ce-144 – SGS	2E-06
I-131	1E-06
Entrained Gases	1E-05
H-3	1E-05
Gross Alpha	1E-07
Sr-89, Sr-90	5E-08
Fe-55	1E-06

Airborne	LLD (uCi/cc)
Gross Alpha, Sr-89, Sr-90	1E-11
H-3	1E-06
I-131	1E-12
Principal Gamma Emitters: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141, Ce-144	1E-11
Noble Gas: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, Xe-138	1E-04

5. Estimated Total Error

The estimated total error reported for continuous and batch liquid releases for all three stations was within 27%. The estimated total error for continuous and batch gaseous releases, and solid waste was within 35%.

6. Non-Routine Planned Discharges and Unplanned Discharges

Regulatory Guide 1.21, Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste, Revision 2 defines a *non-routine, planned discharge* as an effluent release from a release point that is not defined in the ODCM, but that has been planned, monitored, and discharged in accordance with 10 CFR 20.2001. The regulatory guide defines an *unplanned discharge* as the unintended or unexpected discharge of liquid or airborne radioactive material to the unrestricted area.

SGS Unit 1

Liquid	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	0	0	0	0	0
Number of Unplanned Discharges	0	0	0	0	0
Total Curies Discharged	N/A	N/A	N/A	N/A	N/A
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	0	0	0	0	0
Number of Unplanned Discharges	0	0	0	0	0
Total Curies Discharged	N/A	N/A	N/A	N/A	N/A

N/A (Not Applicable)

SGS Unit 2

Liquid	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	0	0	0	0	0
Number of Unplanned Discharges	0	0	0	0	0
Total Curies Discharged	N/A	N/A	N/A	N/A	N/A
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	0	0	0	0	0
Number of Unplanned Discharges	0	0	0	0	0
Total Curies Discharged	N/A	N/A	N/A	N/A	N/A

N/A (Not Applicable)

HCGS:

Liquid	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	8	3	1	0	12
Number of Unplanned Discharges	0	0	0	0	0
Total Curies Discharged	2.53E-03	7.54E-04	4.51E-04	0.00E+00	3.74E-03
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	3	3	3	3	12
Number of Unplanned Discharges	0	0	0	0	0
Total Curies Discharged	3.35E+00	5.73E+00	4.52E+00	3.15E+00	1.67E+01

N/A (Not Applicable)

1. Twelve planned non-routine discharges occurred from pumping the water collected in the Condensate Storage Tank dike that contained small quantities of tritium. This water was discharged via the cooling tower blowdown to the Delaware River.
2. The TLOVE system that discharges gaseous effluents through vents on top of the Turbine Building Roof had monthly release permits issued for the estimated tritium released via the airborne pathway. This is considered a non-routine planned discharge. Each monthly permit represents the combined gaseous curies from the TLOVE system. This activity was calculated using the maximum design flow for each vent, average monthly RCS tritium concentration and the differential temperature between each vent line and the ambient temperature.

7. Other Events

SGS Unit 1

The 2019 Radiological Groundwater Protection Program (RGPP) tritium mass flux calculation determined 0.057 curies was discharged to the Delaware River. A discussion of the RGPP program is detailed in Appendix D.

SGS Unit 2

None

HCGS

The Circulating Water Dewatering Sump compositor was found de-energized on 11/11/2019. This compositor is used to collect a weekly composite water sample for tritium and other hard-to-detect radionuclides analyses required by the ODCM. There was approximately 1.5 liters of water that had been collected for the week prior to being de-energized. (Notification 20839328)

8. Changes to the Offsite Dose Calculation Manuals

There were no changes made to either the SGS or HCGS ODCMs in 2019.

9. Changes from the Annual Land Use Survey Affecting ODCM

The 2019 Land Use Survey (LUC) identified that the ODCM critical receptor in the SW sector at 4.6 miles is no longer present. This receptor included the dose pathways of meat, vegetation, inhalation and ground plane. Doses to this receptor will continue to be calculated until that receptor is removed from the stations' ODCMs.

10. Changes to the Process Control Program

There were no changes to RW-AA-100, Process Control Program for Radioactive Wastes, during 2019.

11. Radioactive Effluent Monitoring Instrumentation Out of Service for More than 30 Days

A. SGS Unit 1:

None

B. SGS Unit 2:

None

C. HCGS:

None

12. Elevated Gaseous Radiation Monitor Responses

During the 2019 reporting period, none of the effluent radiation monitors elicited an elevated response during the discharge of liquid and gaseous effluent from either of the SGS Units 1 and 2 or from the HCGS.

13. Independent Spent Fuel Storage Installation (ISFSI)

There have been no gaseous or liquid releases from the Independent Spent Fuel Storage Installation (ISFSI) since it was placed in service in the summer of 2006. The direct dose from the ISFSI pad to the Critical Receptor located at 4.6 miles in the SW sector, Members of the Public not having access to the Radiologically Controlled Area (RCA) was determined using the dosimetry results from the 2019 Radiological Environmental Monitoring Program (REMP) and the formula provided in ANSI/HPS N13.37-2014 as follows:

$$D_2 = OF * \left((D_1 * R_1^2) / R_2^2 \right)$$

Where:

- D₂ = Dose that will be extrapolated to Security Checkpoint, Sewage Treatment Plant (STP) and Critical Receptor
- OF = Occupancy Factor (1 = full time, 0.25 = 2000 hrs.)
- D₁ = Net Dose that was measured from TLD Location 01S1
- R₁ = Distance from the source to the location where D₁ was obtained
- R₂ = Distance to the location that dose will be extrapolated

There are two dosimetry locations (01S1 and 16S2) that measure dose (above background) from the ISFSI.

Location Of Extrapolated Dose	R ₁ (ft.) Distance from ISFSI to TLD 01S1	R ₁ (ft.) Distance from ISFSI to TLD 16S2	R ₂ (ft.) Distance from ISFSI to Location	D ₁ (mrem) Net Dose of TLD 01S1	D ₁ (mrem) Net Dose of TLD 16S2	OF Occupancy Factor	D2 (mrem) 01S1 Extrapolated Dose for Location	D2 (mrem) 16S2 Extrapolated Dose for Location	Max D2 (mrem) Extrapolated Dose
Members of the Public - off Site									
Critical Receptor	171	203	24,288	91.5	71.9	1.00	4.54E-03	5.02E-03	5.02E-03
Nearest Resident	171	203	19,536	91.5	71.9	1.00	7.01E-03	7.76E-03	7.76E-03
Members of the Public - on Site									
Security Checkpoint	171	203	6,275	91.5	71.9	0.25	1.70E-02	1.88E-02	1.88E-02
Sewage Treatment Plant Worker	171	203	575	91.5	71.9	0.25	2.02E+00	2.24E+00	2.24E+00
Wind Turbine Laydown Area	171	203	1304	91.5	71.9	.25	3.93E-01	4.36E-01	4.36E-01

14. Effluent Trends

The following trend graphs displays the total curies of liquid and gaseous effluents released for SGS and HCGS from 2005 through 2019.

Figure 1
Fission and Activation Gases Released in Gaseous Effluents, Salem Unit 1, Salem Unit 2 and Hope Creek Unit 1, 2005 - 2019

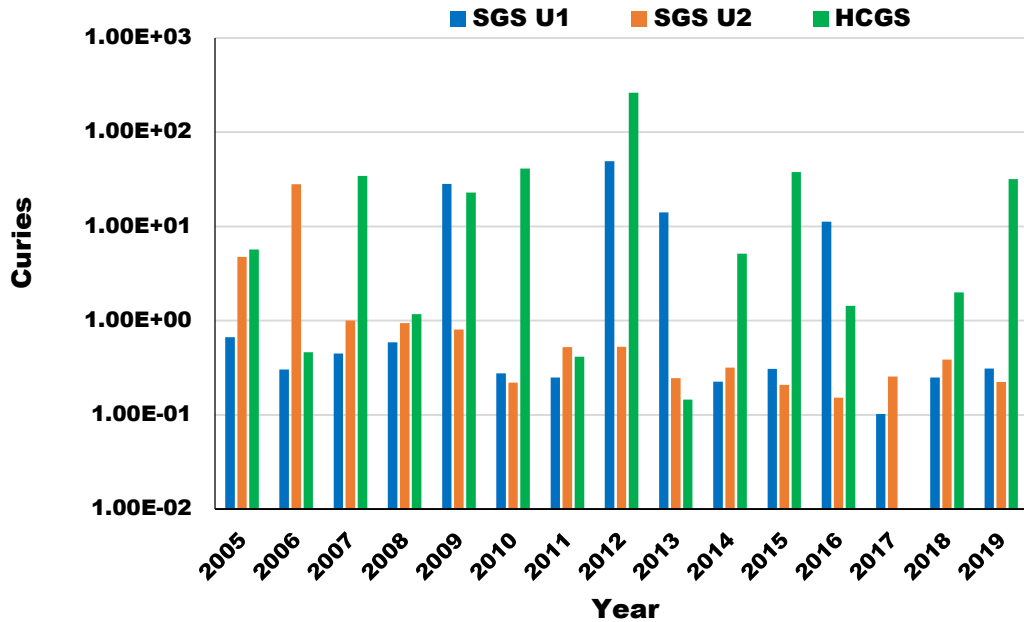
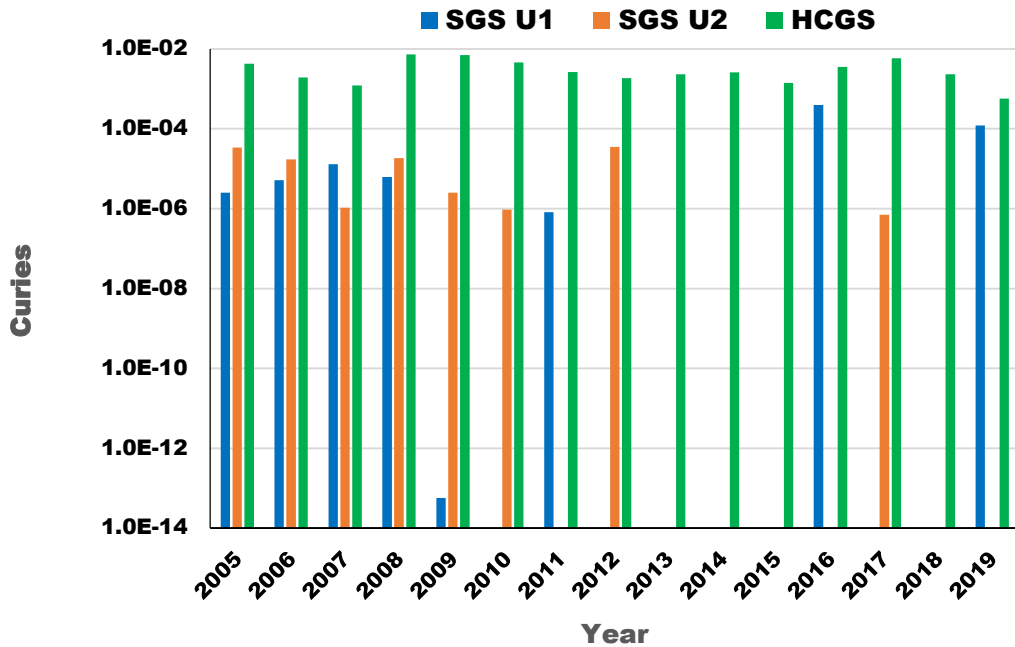
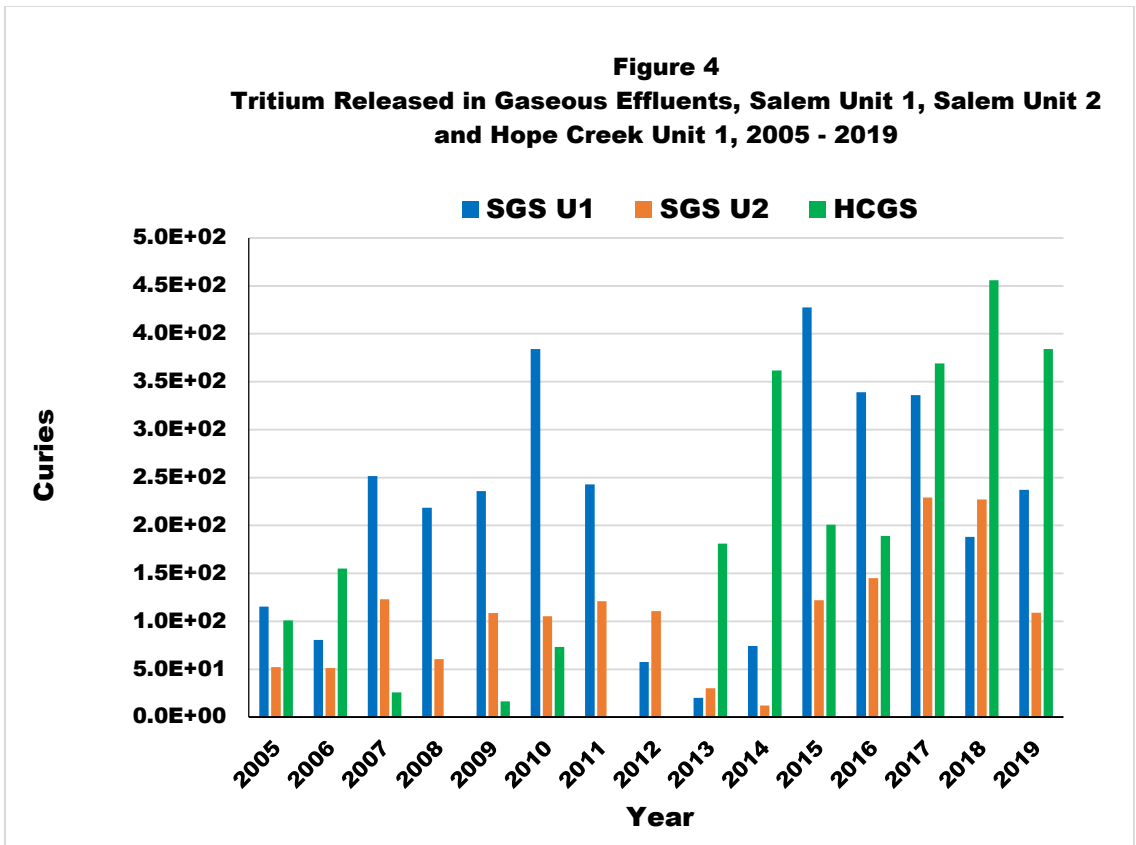
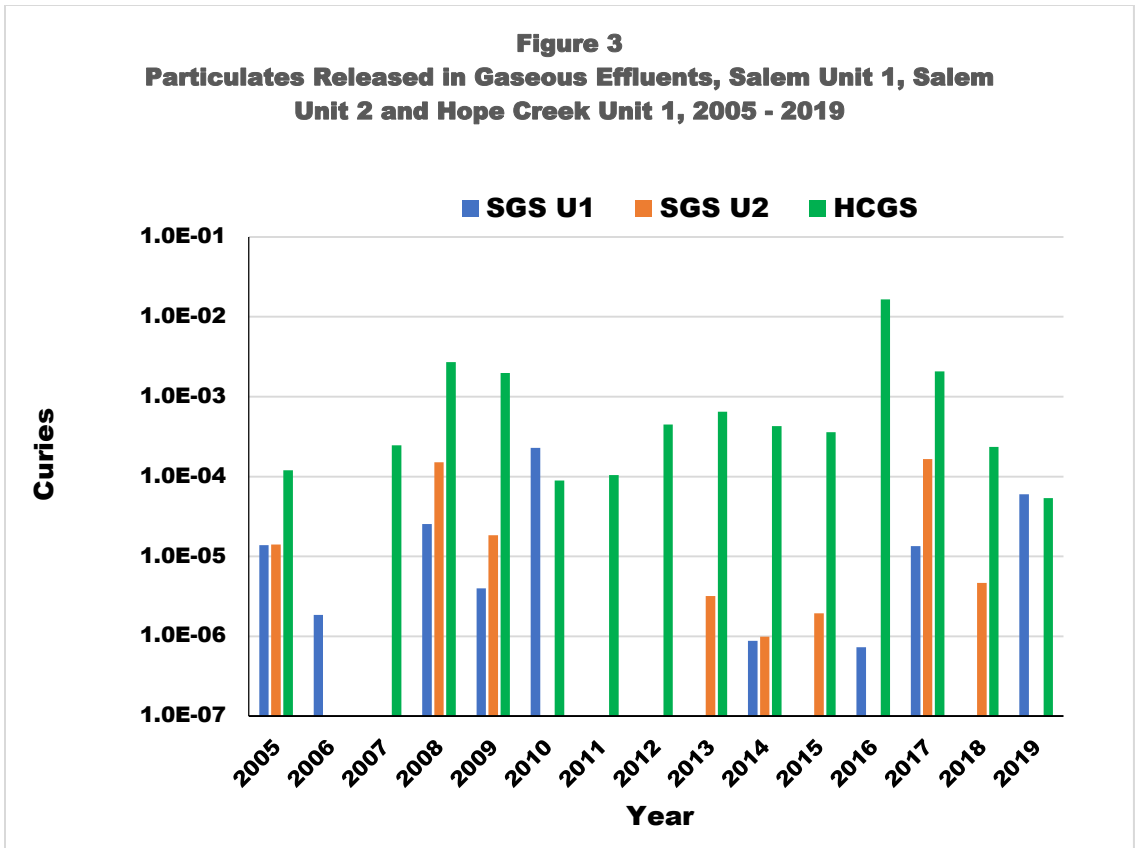
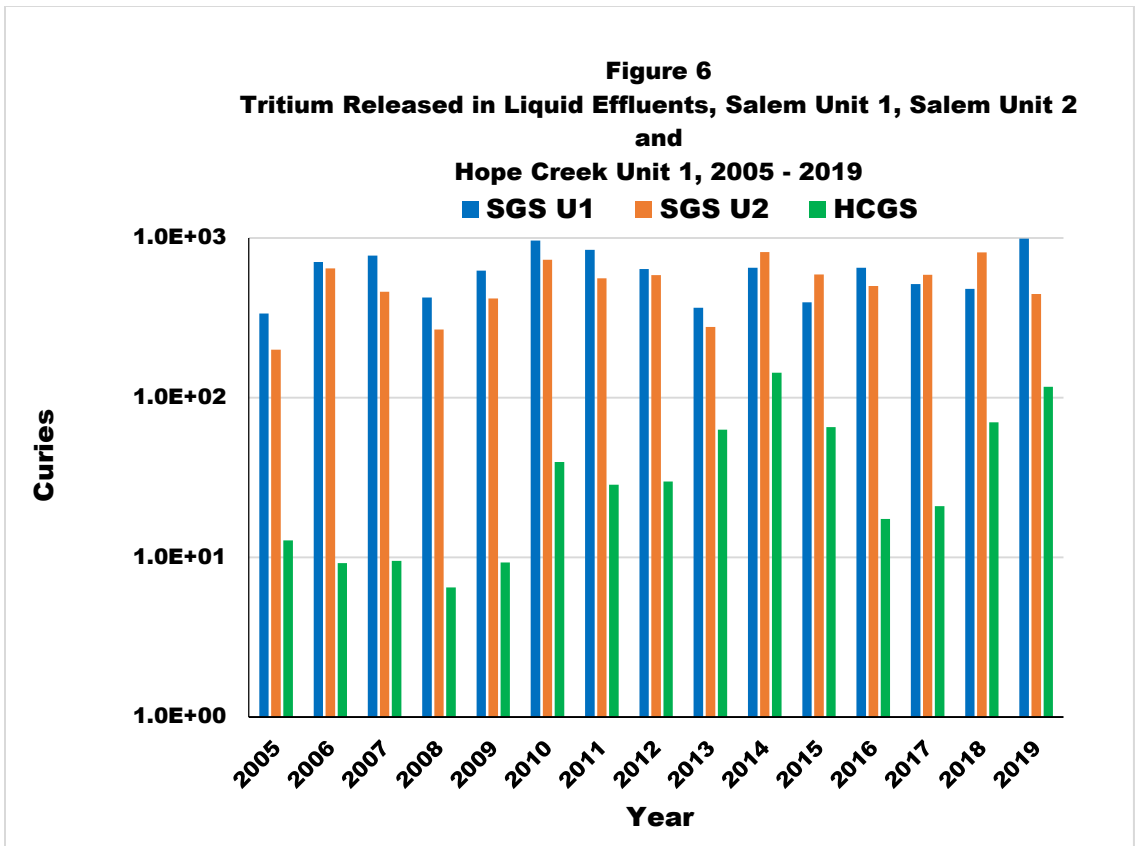
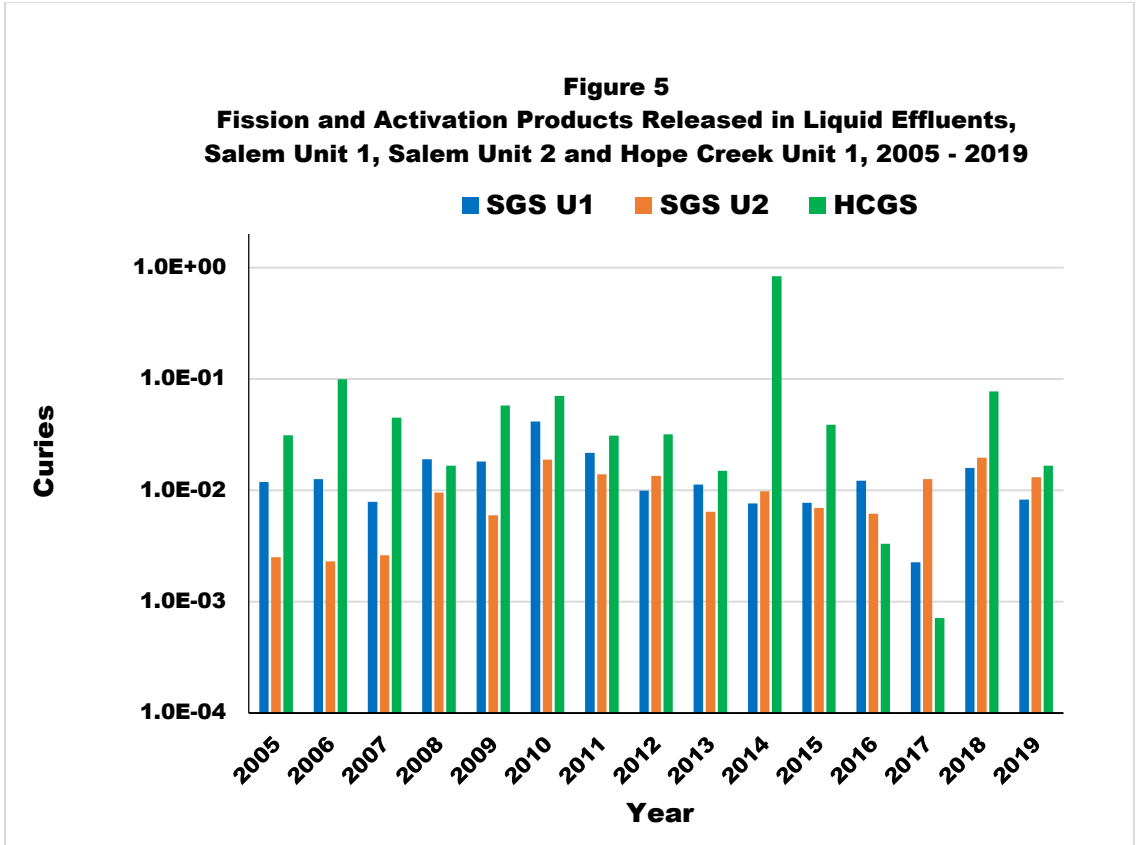


Figure 2
Iodines Released in Gaseous Effluents, Salem Unit 1, Salem Unit 2 and Hope Creek Unit 1, 2005 - 2019







15. Carbon-14 in Gaseous Effluents

The NRC has identified Carbon-14 (C-14) as a potential principal radionuclide for gaseous effluent (refer to Regulatory Position 1.9 in Revision 2 of Regulatory Guide 1.21). Since the publication of Regulatory Guide 1.21, *“Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste”*, Revision 1, June 1974, the radioactive effluents from commercial nuclear power plants have decreased to the point that C-14 was likely to be a principal radionuclide in gaseous effluents. Gaseous effluent releases from a boiling water reactor (BWR), such as the HCGS, and pressurized water reactor (PWR), such as the SGS Units 1 and 2, can contain significant quantities of C-14, the NRC has recommended that licensees evaluate C-14 as a potential principal radionuclide for gaseous releases from their facility. Those evaluations have determined that C-14 was a “principal radionuclide” in gaseous effluent from each of the three stations.

The assessment methodology used to estimate the quantity of C-14 discharged in gaseous effluent from the SGS and HCGS involved the use of a normalized C-14 source term and scaling factors based on power generation from EPRI Technical Report 1021106, *“Estimation of Carbon-14 in Nuclear Power Plant Gaseous Effluents”*, December 2010. This method was selected based on guidance offered in Regulatory Guide 1.21, and incorporates dose models described 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.

The following assumptions were incorporated into the method:

- Only C-14 in the form of CO₂ was incorporated into vegetation through photosynthesis, which causes dose via the ingestion exposure pathways.
- The concentration of C-14 in vegetation was proportional to the concentration of C-14 in air (per equation C-8 in Regulatory Guide 1.109).
- 95% of C-14 released from a BWR (i.e., HCGS) and 30% of C-14 released from a PWR (i.e., SGS Units 1 and 2) was in the form of CO₂ (EPRI Technical Report 1021106).
- The total MW h_e electrical output by unit for 2019 was as follows:

SGS Unit 1	7,944,369	MW ^x h _e
SGS Unit 2	9,966,009	MW ^x h _e
HCGS	8,726,946	MW ^x h _e

Using scaling factors and the 2019 power generation data, the estimated total C-14 released in 2019 was 9.06 Ci from SGS Unit 1, 11.37 Ci from SGS Unit 2, and 14.93 Ci from the HCGS.

The calculated dose contribution of C-14 was determined using the methodology detailed in the HCGS’s and SGS’s ODCMs. The calculated maximum total body and organ (bone) doses from C-14 occurred for a child receptor at 4.6 miles SW (Table 1) using the pathways of inhalation, meat and vegetation. The calculated doses from the estimated C-14 in gaseous effluents represent about 100% of the total bone dose from both SGS and HCGS.

Table 1
Quarterly and Annual Bone Doses from Radioactive Gaseous Effluent Releases from the Site to the Critical Receptor (Child) and Pathway (Inhalation, Meat, Food Products and Ground Shine) 2019.

Bone Dose all Radionuclides except C-14 (mrem)	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
SGS Unit 1	2.66E-07	4.22E-06	0.00E+00	0.00E+00	4.49E-06
SGS Unit 2	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
HCGS	4.05E-04	8.32E-07	2.60E-05	1.05E-05	4.42E-04
Total Bone Dose from Other Radionuclides (mrem)	4.05E-04	5.05E-06	2.60E-05	1.05E-05	4.46E-04
Bone Dose Including C-14 (mrem)	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
SGS Unit 1	2.29E-02	2.22E-02	2.40E-02	2.44E-02	9.35E-02
SGS Unit 2	2.83E-02	2.81E-02	2.93E-02	3.14E-02	1.17E-01
HCGS	2.51E-02	2.74E-02	2.76E-02	3.11E-02	1.11E-01
Total Dose (mrem)	7.63E-02	7.77E-02	8.09E-02	8.69E-02	3.22E-01
Total Dose From C-14 (mrem)	7.59E-02	7.77E-02	8.09E-02	8.69E-02	3.21E-01
Percent of dose from C-14	99.5%	100.0%	100.0%	100.0%	99.9%

16. Errata Data Section: Modifications or Revisions Made to Previous Radioactive Effluent Release Reports

- In 2019 the calculation performed to determine the amount of tritium being released from the lubricating oil ventilation system that discharges to the Turbine Building Roof was modified to use the maximum design flow for the four release points (8" MTLO Vent, 3" RFPT Vent, 3" GHSO Vent and the 10" GHSO Vent) in the calculation of tritium released to the atmosphere. Using this new calculation, the non-routine planned discharges from the TLOVE system reported in the 2017 and 2018 ARERR were revised as follows:

2017 Reported					
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	3	3	3	3	12
Total Curies Discharged	1.44E+00	1.58E+00	1.12E+00	1.51E+00	5.65E+00
2017 Revised					
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	3	3	3	3	12
Total Curies Discharged	2.89E+00	3.43E+00	2.52E+00	3.15E+00	1.20E+01

2018 Reported					
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	3	3	3	3	12
Total Curies Discharged	1.54E+00	1.15E+00	1.25E+00	1.82E+00	5.76E+00
2018 Revised					
Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Non-Routine Planned Discharges	3	3	3	3	12
Total Curies Discharged	3.05E+00	1.69E+00	2.85E+00	3.79E+00	1.14 E+01

The revised calculation determined that an additional 6.35 curies of tritium was released in 2017 and an additional 5.64 curies of tritium was released in 2018 from the TLOVE system. These revisions represent an increase of 1.7% and 1.2% of the 2017 and 2018 total gaseous tritium releases, respectively. In addition to updating the above tables the summary tables for gaseous releases for both 2017 and 2018 tritium values were updated.

TABLE 2A-3

GASEOUS EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: HCGS

Period: 2017

A. Fission & Activation Gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
Total Release	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	3.400E+01
Average release rate for the period	µCi/sec	< LLD	< LLD	< LLD	< LLD	< LLD	
Percent of limit (ODCM 3.11.2.2(a))	Gamma Air %	See Table 3 on page 20					
	Beta Air %						
B. Iodines and Halogens							
Total Release	Ci	5.66E-04	1.92E-03	1.75E-03	1.59E-03	5.83E-03	3.00E+01
Average release rate for the period	µCi/sec	7.28E-05	2.44E-04	2.21E-04	2.00E-04	1.85E-04	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
C. Particulates							
Particulates with half-lives > 8 days	Ci	3.31E-04	7.49E-04	3.12E-04	6.75E-04	2.07E-03	3.00E+01
Average release rate for the period	µCi/sec	4.25E-05	9.53E-05	3.93E-05	8.49E-05	6.55E-05	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
Gross alpha radioactivity	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	
D. Tritium							
Total Release	Ci	9.96E+01	9.81E+01	1.09E+02	6.79E+01	3.75E+02	3.10E+01
Average release rate for the period	µCi/sec	1.28E+01	1.25E+01	1.37E+01	8.54E+00	1.19E+01	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
E. C-14							
Total Release	Ci	4.53E+00	4.53E+00	4.58E+00	4.58E+00	1.82E+01	N/A
Average release rate for the period	µCi/sec	5.83E-01	5.77E-01	5.77E-01	5.77E-01	5.77E-02	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
F. I-131, I-133, H-3 & Particulates > 8 day half-life							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 3 on page 20					
G. I-131, I-133, H-3, Particulates > 8 day half-life & C-14							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 3 on page 20					

TABLE 1A-3

GASEOUS EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: HCGS

Period: _____ 2018

A. Fission & Activation Gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
Total Release	Ci	< LLD	7.69E-05	7.20E-01	1.27E+00	1.99E+00	3.40E+01
Average release rate for the period	µCi/sec	< LLD	9.78E-06	9.06E-02	1.60E-01	6.32E-02	
Percent of limit (ODCM 3.11.2.2(a))	Gamma Air %	See Table 2 on page 18					
	Beta Air %						
B. Iodines and Halogens							
Total Release	Ci	2.05E-03	2.45E-04	2.20E-06	7.83E-06	2.30E-03	3.00E+01
Average release rate for the period	µCi/sec	2.63E-04	3.11E-05	2.77E-07	9.85E-07	7.29E-05	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
C. Particulates							
Particulates with half-lives > 8 days	Ci	2.29E-04	< LLD	4.45E-06	2.16E-06	2.35E-04	3.00E+01
Average release rate for the period	µCi/sec	2.94E-05	< LLD	5.60E-07	2.72E-07	7.46E-06	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
Gross alpha radioactivity	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	
D. Tritium							
Total Release	Ci	1.35E+02	6.27E+01	9.93E+01	1.65E+02	4.62E+02	3.10E+01
Average release rate for the period	µCi/sec	1.74E+01	7.97E+00	1.25E+01	2.07E+01	1.46E+01	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
E. C-14							
Total Release	Ci	4.32E+00	3.58E+00	4.03E+00	4.40E+00	1.63E+01	N/A
Average release rate for the period	µCi/sec	5.56E-01	4.55E-01	5.07E-01	5.53E-01	5.18E-01	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
F. I-131, I-133, H-3 & Particulates > 8 day half-life							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					
G. I-131, I-133, H-3, Particulates > 8 day half-life & C-14							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					

- The total cubic meters shipped in 2018 from SGS Units 1 and 2 Table 3A-2 Solid Waste and Irradiated Fuel Shipments Solid Radwaste Shipped Offsite for Burial or Disposal was reported as 2.44E+010. The correct value was 2.44E+01. (Notification 20836989) The revised table is included below.

**TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL
(Not Irradiated Fuel)**

Facility: SGS Units 1 and 2

Period: 2018

**a. Waste Stream; Resins, Filters, and Evaporator Bottoms
Liquid Waste Processing Resin**

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	7.60E+02	2.15E+01	8.10E+00	+/-25%
B	1.00E+02	2.83E+00	4.32E+01	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	8.60E+02	2.44E+01	5.13E+01	+/-25%
Major Nuclides for Above Table:				Percent Cutoff 1%
Resins, Filters and Evaporator Bottoms Waste Class A				
Nuclide Name	Percent Abundance		Curies	
H-3	1.26%		1.02E-01	
Fe-55	9.30%		7.53E-01	
Co-58	2.60%		2.11E-01	
Co-60	25.50%		2.06E+00	
Ni-63	55.02%		4.46E+00	
Sb-125	1.84%		1.49E-01	
Cs-137	2.34%		1.90E-01	
Resins, Filters and Evaporator Bottoms Waste Class B				
Nuclide Name	Percent Abundance		Curies	
Fe-55	2.42%		1.04E+00	
Co-60	11.91%		5.14E+00	
Ni-63	77.71%		3.36E+01	
Cs-137	6.03%		2.60E+00	
Resins, Filters and Evaporator Bottoms Waste Class C				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	

IV. Radiological Impact on Man

1. Effluent Doses

The doses from gaseous and liquid effluent represent the maximum potential radiation dose for a member of the general public following the methodology in the station's ODCM and reported by the SGS's and HCGS's OpenEMS database programs.

The annual doses presented in the tables below represent calculations for the four quarters of 2019. The radiological doses from SGS Units 1 and 2 and HCGS from gaseous and liquid effluent discharges are presented in Tables 2 and 3, respectively, and demonstrate compliance with applicable regulatory limits. Dose limit values presented in bold font are regulatory limits. The quarterly doses must not exceed the quarterly limit in any quarter and the summation of two or more quarterly doses must not exceed the annual dose limit.

A. Doses from Gaseous Effluent using Default Conservative Meteorology:

Quarterly doses from gaseous effluent were calculated using the methodology described in the SGS and HCGS ODCMs. Usage factors and dose conversion factors used in the gaseous dose calculations were those presented in the SGS and HCGS ODCMs.

The individual doses from radioactive gaseous effluents (presented in Table 2) were calculated for the controlling locations described in the SGS and HCGS ODCMs using the methodology in the ODCMs by the SGS's OpenEMS and the HCGS OpenEMS database programs. The dose contribution from C-14 was determined by OpenEMS using the methodology listed in the stations' ODCM.

Table 2
2019 Doses and Percent of the Limits from Gaseous Effluents by Operating Unit

SGS Unit 1							
Gaseous Effluent Parameter		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual	
Gaseous Dose From Noble Gas	Gamma Air	Dose Limit (mrad)	5.00E+00				1.00E+01
		Max Gamma Air Dose (mrad)	3.74E-05	1.04E-05	2.36E-05	2.97E-05	1.01E-04
		% Dose Limit	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
	Beta Air	Dose Limit (mrad)	1.00E+01				2.00E+01
		Maximum Beta Air Dose (mrad)	1.57E-05	1.10E-05	8.95E-06	1.14E-05	4.70E-05
		% Dose Limit	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Gaseous Dose From I-131, I-133, H-3, C-14* and Particulate Nuclides with half-life > 8 Days	Organ Dose Limit (mrem)		7.50E+00				1.50E+01
	* no C-14 Dose	ODCM Critical Receptor (mrem)	4.34E-03	7.68E-03	5.19E-03	3.83E-03	2.10E-02
		% Dose Limit	0.06	0.10	0.07	0.05	0.14
	* with C-14 Dose	ODCM Critical Receptor (mrem)	2.29E-02	2.22E-02	2.40E-02	2.44E-02	9.35E-02
		% Dose Limit	0.31	0.30	0.32	0.33	0.62

Table 2
2019 Doses and Percent of the Limits from Gaseous Effluents by Operating Unit (cont.)

SGS Unit 2							
Gaseous Effluent Parameter		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual	
Gaseous Dose From Noble Gas	Gamma Air	Dose Limit (mrad)	5.00E+00				1.00E+01
		Max Gamma Air Dose (mrad)	3.05E-05	2.86E-05	2.54E-05	4.90E-05	1.33E-04
		% Dose Limit	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
	Beta Air	Dose Limit (mrad)	1.00E+01				2.00E+01
		Maximum Beta Air Dose (mrad)	1.11E-05	1.01E-05	9.88E-06	1.73E-05	4.83E-05
		% Dose Limit	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Gaseous Dose From I-131, I-133, H-3, C-14* and Particulate Nuclides with half-life > 8 Days	Organ Dose Limit (mrem)		7.50E+00			1.50E+01	
	* no C-14 Dose	ODCM Critical Receptor (mrem)	3.27E-04	3.40E-03	2.67E-03	3.29E-03	9.69E-03
		% Dose Limit	< 0.01	0.05	0.04	0.04	0.06
	* with C-14 Dose	ODCM Critical Receptor (mrem)	2.83E-02	2.81E-02	2.93E-02	3.14E-02	1.17E-01
		% Dose Limit	0.38	0.38	0.39	0.42	0.78
	HCGS						
Gaseous Effluent Parameter		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual	
Gaseous Dose From Noble Gas	Gamma Air	Dose Limit (mrad)	5.00E+00				1.00E+01
		Max Gamma Air Dose (mrad)	2.69E-04	6.08E-07	1.39E-03	2.37E-04	1.90E-03
		% Dose Limit	0.01	< 0.01	0.03	0.00	0.02
	Beta Air	Dose Limit (mrad)	1.00E+01				2.00E+01
		Maximum Beta Air Dose (mrad)	2.93E-04	1.79E-06	2.47E-03	4.38E-04	3.21E-03
		% Dose Limit	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Gaseous Dose From I-131, I-133, H-3, C-14* and Particulate Nuclides with half-life > 8 Days	Organ Dose Limit (mrem)		7.50E+00			1.50E+01	
	* no C-14 Dose	ODCM Critical Receptor (mrem)	1.25E-02	5.43E-03	8.45E-03	1.40E-02	4.03E-02
		% Dose Limit	0.17	0.07	0.11	0.19	0.27
	* with C-14 Dose	ODCM Critical Receptor (mrem)	2.51E-02	2.74E-02	2.76E-02	3.11E-02	1.11E-01
		% Dose Limit	0.33	0.36	0.37	0.41	0.74

Table 2
2019 Doses and Percent of the Limits from Gaseous Effluents by Operating Unit (cont.)

SGS-HCGS Site Total							
Gaseous Effluent Parameter		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual	
Gaseous Dose From Noble Gas	Gamma Air	Dose Limit (mrad)	1.50E+01				3.00E+01
		Max Gamma Air Dose (mrad)	3.37E-04	3.96E-05	1.44E-03	3.15E-04	2.13E-03
		% Dose Limit	< 0.01	< 0.01	0.01	< 0.01	0.01
	Beta Air	Dose Limit (mrad)	3.00E+01				6.00E+01
		Maximum Beta Air Dose (mrad)	3.19E-04	2.29E-05	2.49E-03	4.67E-04	3.30E-03
		% Dose Limit	< 0.01	< 0.01	0.01	< 0.01	0.01
Gaseous Dose From I-131, I-133, H-3, C-14* and Particulate Nuclides with half-life > 8 Days	Organ Dose Limit (mrem)		2.25E+01				4.50E+01
	* no C-14 Dose	ODCM Critical Receptor (mrem)	1.71E-02	1.65E-02	1.63E-02	2.11E-02	7.10E-02
		% Dose Limit	0.08	0.07	0.07	0.09	0.16
	* with C-14 Dose	ODCM Critical Receptor (mrem)	7.63E-02	7.77E-02	8.09E-02	8.69E-02	3.22E-01
		% Dose Limit	0.34	0.35	0.36	0.39	1.43

B. Doses from Liquid Effluent:

Quarterly and Annual Total Body and Critical Organ doses from liquid effluent were calculated using the methodology described in the SGS and HCGS ODCMs at the controlling receptor location of 0.75 miles N of SGS. Usage factors and dose conversion factors used in the liquid dose calculations were those presented in the SGS and HCGS ODCMs.

Table 3
2019 Doses and Percent of the Limits from Liquid Effluents by Operating Unit

SGS Unit 1					
Liquid Effluent Parameter	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual
Total Body Dose Limit (mrem)	1.50E+00				3.00E+00
Maximum Total Body Dose (mrem)	3.42E-03	3.14E-03	1.93E-03	4.99E-03	1.35E-02
% Dose Limit	0.23	0.21	0.13	0.33	0.45
Organ Dose Limit (mrem)	5.00E+00				1.00E+01
Maximum Organ Dose (mrem)	4.11E-03	5.01E-03	2.52E-03	5.11E-03	1.67E-02
% Dose Limit	0.08	0.10	0.05	0.10	0.17
SGS Unit 2					
Liquid Effluent Parameter	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual
Total Body Dose Limit (mrem)	1.50E+00				3.00E+00
Maximum Total Body Dose (mrem)	1.27E-03	1.01E-03	5.58E-04	1.15E-03	3.99E-03
% Dose Limit	0.08	0.07	0.04	0.08	0.13
Organ Dose Limit (mrem)	5.00E+00				1.00E+01
Maximum Organ Dose (mrem)	3.53E-03	1.89E-02	1.62E-03	1.94E-03	2.60E-02
% Dose Limit	0.07	0.38	0.03	0.04	0.26

Table 3
2019 Doses and Percent of the Limits from Liquid Effluents by Operating Unit (cont.)

HCGS					
Liquid Effluent Parameter	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual
Total Body Dose Limit (mrem)	1.50E+00				3.00E+00
Maximum Total Body Dose (mrem)	2.15E-05	5.47E-05	3.99E-05	6.75E-04	7.92E-04
% Dose Limit	< 0.01	< 0.01	< 0.01	0.05	0.03
Organ Dose Limit (mrem)	5.00E+00				1.00E+01
Maximum Organ Dose (mrem)	2.37E-05	2.80E-04	7.44E-05	2.04E-03	2.41E-03
% Dose Limit	< 0.01	0.01	< 0.01	0.04	0.02
SGS Units 1&2 + HCGS Site Total					
Liquid Effluent Parameter	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Annual
Total Body Dose Limit (mrem)	4.50E+00				9.00E+00
Maximum Total Body Dose (mrem)	4.71E-03	4.21E-03	2.53E-03	6.82E-03	1.83E-02
% Dose Limit	0.10	0.09	0.06	0.15	0.41
Organ Dose Limit (mrem)	1.50E+01				3.00E+01
Maximum Organ Dose (mrem)	7.66E-03	2.41E-02	4.21E-03	9.09E-03	4.51E-02
% Dose Limit	0.05	0.16	0.03	0.06	0.30

C. Doses from Gaseous Effluent using 2019 Annual Average Meteorology:

As a check on the use of conservative historical meteorological dispersion (χ/Q) and deposition values (D/Q), the 2019 gaseous release curies (Tables 1C-1, 1C-2 and 1C-3) for each of the three units and the 2019 annual average dispersion and deposition data (Table 4) were entered into the NRC approved GASPARG computer program to calculate doses to the critical receptors and pathways identified by the 2019 Land Use Census (LUC). The receptor locations for this dose calculation were plotted with the 2019 wind rose overlay (Figure 7). The 2019 annual joint frequency data and calculated χ/Q and D/Q values for SGS and HCGS are detailed in Appendix B. The PSEG meteorological monitoring program achieved 96.0% joint frequency data recovery.

The methods used to determine gaseous doses were consistent with the methods described in SGS and HCGS ODCMs and in NRC Regulatory Guide 1.109. The 2019 LUC did not identify any gardens greater than 500 ft² within five miles producing broadleaf vegetation; however, that pathway was included in the dose analysis.

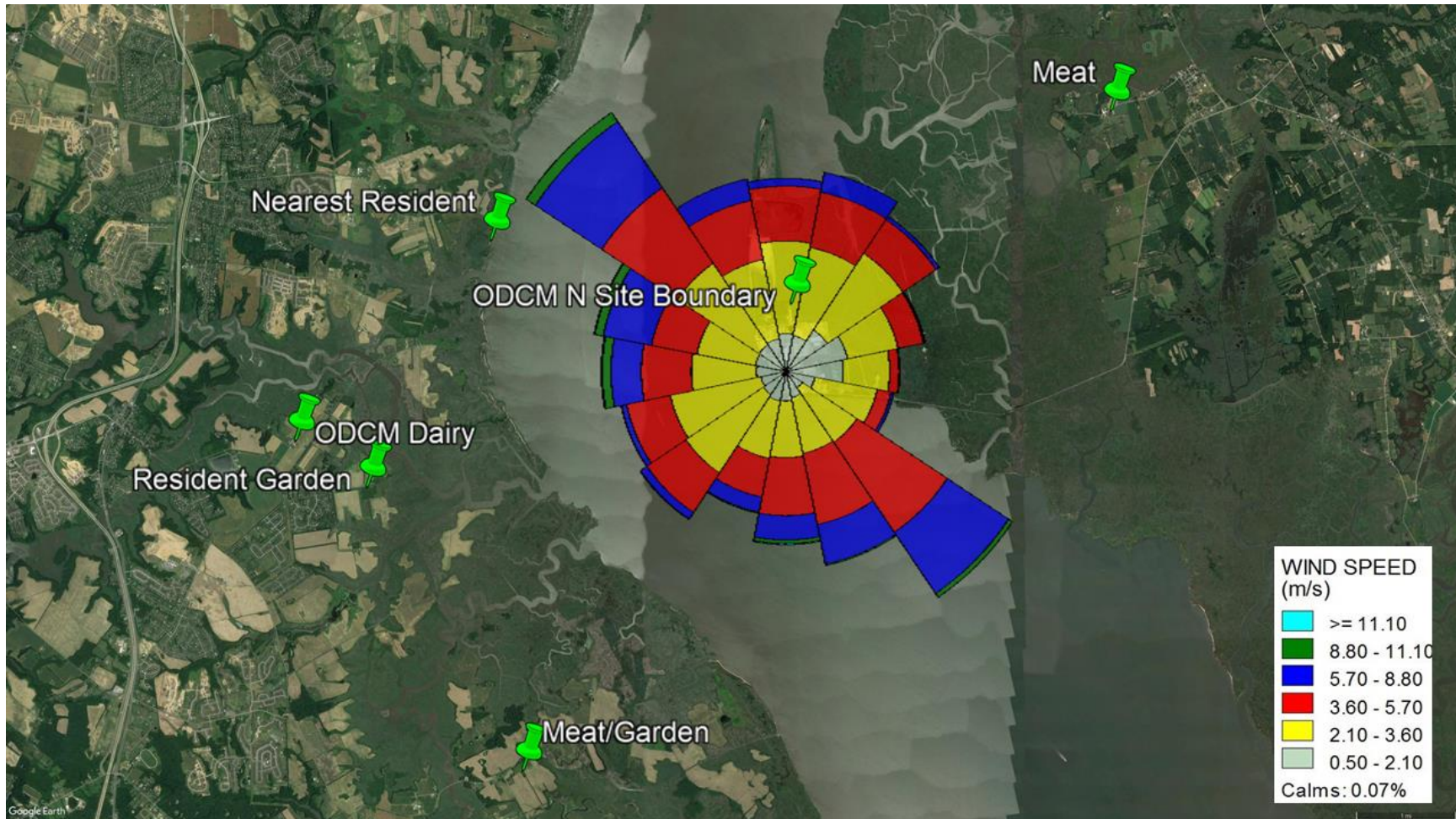
Using the 2019 meteorology data the GASPARG calculated doses (Table 5) were lower than those reported in Table 2 for the critical receptor located at 4.6 miles SW using the default ODCM meteorology, except for C-14. The 2019 χ/Q value was higher than that in the ODCM.

	Organ Dose Excluding C-14	Organ Dose Including C-14
Critical Receptor 4.6 mi SW Table 2 page 20	7.10E-02	3.22E-01
Critical Receptor 4.6 mi SW Table 5 page 25	1.76E-02	4.14E-01

Table 4
2019 Annual Average Undepleted X/Q, Depleted X/Q and D/Q
and Active Exposure Pathways

Receptor Location	Undepleted X/Q (sec./m ³)	Depleted X/Q (sec./m ³)	D/Q (1/m ²)	Active Exposure Pathways
HCGS Site- Boundary (0.5 mi N)	1.7E-06	1.6E-06	1.1E-08	Plume Immersion, Ground Deposition, Inhalation
SGS Site-Boundary (0.83 mi N)	7.9E-07	7.0E-07	4.9E-09	Plume Immersion, Ground Deposition, Inhalation
ODCM Dairy (4.9mi W)				Plume Immersion, Ground Deposition, Inhalation, Milk Ingestion
SGS	8.2E-08	6.1E-08	1.5E-10	
HCGS	8.1E-08	6.1E-08	1.5E-10	
Resident (3.7mi NW)				Plume Immersion, Ground Deposition, Inhalation
SGS	1.4E-07	1.1E-07	5.9E-10	
HCGS	1.4E-07	1.1E-07	5.9E-10	
Resident-Garden (5.0mi ENE)				Plume Immersion, Ground Deposition, Inhalation Vegetable Ingestion
SGS	7.0E-08	5.3E-08	2.1E-10	
HCGS	7.0E-08	5.2E-08	2.1E-10	
Resident-Meat (4.2mi NE)				Plume Immersion, Ground Deposition, Inhalation, Meat Ingestion
SGS	1.1E-07	8.1E-08	3.0E-10	
HCGS	1.1E-07	8.1E-08	3.0E-10	
Resident-Garden-Meat (4.6mi SW)				Plume Immersion, Ground Deposition, Inhalation, Meat Ingestion, Vegetable Ingestion
SGS	1.0E-07	7.6E-08	2.7E-10	
HCGS	1.0E-07	7.5E-08	2.7E-10	

Figure 7
Locations of Dose Calculation Receptors with 2019 Wind Rose Overlay



Note: Wind rose depicts fraction of time wind transports gaseous effluents from each of the sixteen compass sectors. The 2019 Joint Frequency Data recovery rate = 96.0%

Table 5
2019 Total Body and Critical Organ Doses at Receptor Locations
Using Annual Average X/Q and D/Q Data by Operating Unit

Operating Unit	ODCM Site Boundary Critical Organ Doses Inhalation, Ground Plane (0.5 / 0.8 mi N)			
	Excluding C-14		Including C-14	
	Total Body (mrem)	Organ (mrem)	Total Body (mrem)	Organ (mrem)
SGS Unit 1	4.33E-03	4.34E-03	5.44E-03	8.18E-03
SGS Unit 2	2.01E-03	2.03E-03	3.70E-03	1.03E-02
HCGS	1.64E-02	1.80E-02	2.03E-02	3.05E-02
Site Total	2.27E-02	2.44E-02	2.94E-02	4.90E-02
Operating Unit	ODCM Dairy Critical Organ Doses Inhalation, Ground Plane, Milk (4.9 mi W)			
	Excluding C-14		Including C-14	
	Total Body (mrem)	Organ (mrem)	Total Body (mrem)	Organ (mrem)
SGS Unit 1	1.08E-03	1.08E-03	1.76E-02	7.73E-02
SGS Unit 2	4.96E-04	4.98E-04	2.13E-02	9.73E-02
HCGS	1.77E-03	2.31E-03	2.87E-02	1.26E-01
Site Total	3.35E-03	3.90E-03	6.75E-02	3.01E-01
Operating Unit	Nearest Resident Critical Organ Doses Inhalation, Ground Plane (3.7 mi NW)			
	Excluding C-14		Including C-14	
	Total Body (mrem)	Organ (mrem)	Total Body (mrem)	Organ (mrem)
SGS Unit 1	7.66E-04	7.69E-04	9.63E-04	1.45E-03
SGS Unit 2	3.57E-04	3.60E-04	6.57E-04	1.83E-03
HCGS	1.34E-03	1.47E-03	1.66E-03	2.49E-03
Site Total	2.47E-03	2.60E-03	3.28E-03	5.77E-03
Operating Unit	Resident - Garden Critical Organ Doses Inhalation, Ground Plane, Vegetation (4.4 mi WSW)			
	Excluding C-14		Including C-14	
	Total Body (mrem)	Organ (mrem)	Total Body (mrem)	Organ (mrem)
SGS Unit 1	1.56E-03	1.56E-03	1.59E-02	7.18E-02
SGS Unit 2	1.78E-04	1.80E-04	3.28E-04	9.12E-04
HCGS	6.66E-04	7.32E-04	8.28E-04	1.25E-03
Site Total	2.40E-03	2.47E-03	1.70E-02	7.40E-02

Table 5

2019 Total Body and Critical Organ Doses at Receptor Locations Using Annual Average X/Q and D/Q Data by Each Operating Unit (continued)

Operating Unit	Meat Critical Organ Doses Inhalation, Ground Plane, Meat 4.2 mi NNE			
	Excluding C-14		Including C-14	
	Total Body (mrem)	Organ (mrem)	Total Body (mrem)	Organ (mrem)
SGS Unit 1	7.52E-04	7.55E-04	4.23E-03	1.80E-02
SGS Unit 2	3.49E-04	3.51E-04	4.81E-03	2.26E-02
HCGS	1.29E-03	1.39E-03	7.04E-03	2.99E-02
Site Total	2.39E-03	2.50E-03	1.61E-02	7.05E-02
Operating Unit	Meat - Garden Critical Organ Doses Inhalation, Ground Plane, Meat, Vegetation 4.6 mi SW			
	Excluding C-14		Including C-14	
	Total Body (mrem)	Organ (mrem)	Total Body (mrem)	Organ (mrem)
SGS Unit 1	3.08E-03	1.26E-02	2.13E-02	9.67E-02
SGS Unit 2	8.78E-04	8.80E-04	2.52E-02	1.22E-01
HCGS	3.83E-03	4.08E-03	4.29E-02	1.95E-01
Site Total	7.79E-03	1.76E-02	8.93E-02	4.14E-01

As set forth in 10CFR50 Appendix I, ALARA requirements for gaseous effluent were met if a licensee demonstrates that the estimated annual external dose from gaseous effluents to any individual in unrestricted areas does not exceed 5 mrem to the total body or 15 mrem to the skin. Compliance with these limits was demonstrated for 2019 gaseous effluents by the calculated total body and skin doses from external exposure pathways (i.e., plume and ground deposition) at the controlling site boundary location in the north sector. The calculated total body dose and skin dose from the combined gaseous releases for the site represent less than 0.46% (Total Body) and less than 0.32% (Organ) of the respective dose limits (Table 5 Site Boundary Location). This confirms that no single unit's radioactive gaseous effluent releases exceeded the Appendix I dose limits. These doses (presented below) were calculated using the GASPAR computer program, which was consistent with the methods described in Regulatory Guide 1.109.

Dose Parameter from Table 5 Site Boundary	Annual Dose (mrem)
Total Body Dose from Noble Gases, Iodines, Particulates, H-3 and C-14:	2.28E-02
Percent of Appendix I Annual Limit (5 mrem):	0.46%
Organ Dose from Noble Gases, Iodines, Particulates, H-3 and C-14:	4.75E-02
Percent of Appendix I Annual Limit (15 mrem):	0.32%

2. Total Dose to a Member of the Public, Resulting from Radioactive Effluent Releases and Radiation from Uranium Fuel Cycle Sources

40 CFR 190 and 10 CFR 72.104 limit the total dose to a “Real Individual” to 25 mrem to the total body, 75 mrem to the thyroid and 25 mrem to other organs other than the thyroid. The maximum annual total body and organ doses from gaseous and liquid pathways with all other uranium fuel cycle sources present on site were calculated as required by section 3.11.4 of the SGS and HCGS ODCMs. The direct dose from the ISFSI pad was determined using the Radiological Environmental Monitoring Program (REMP) and the guidance provided in ANSI/HPS N13.37-2014 (see page 9).

The direct shine dose from the ISFSI to the Critical Receptor located at 4.6 miles in the SW sector was conservatively estimated at 4.54E-03 mrem. The doses from the gaseous and liquid radioactive effluents released from SGS Units 1 and Unit 2 and HCGS in 2019 resulted in a calculated total body and an organ dose of 1.06E-01 mrem and 4.58E-01 mrem, respectively. The majority of dose was from the gaseous dose pathways from C-14. The total dose was calculated as 5.68E-01mrem, which was below the limits of 40 CFR 190 and 10 CFR 72.104. The results of this analysis are in Table 6.

Table 6

2019 Total Body and Organ Doses due to Liquid and Gaseous Effluents and Direct Shine ISFSI Dose to the Critical Receptor Located at 4.6 miles SW

Generating Station	Total Body Dose (mrem)		Critical Organ Dose (mrem)		ISFSI (mrem)
	Liquid	Gaseous*	Liquid	Gaseous*	
SGS Unit 1	1.35E-02	2.13E-02	1.67E-02	9.67E-02	
SGS Unit 2	3.99E-03	2.52E-02	2.60E-02	1.22E-01	
HCGS	7.92E-04	4.11E-02	2.41E-03	1.94E-01	
Total	1.83E-02	8.76E-02	4.51E-02	4.13E-01	
Total of Liquid and Gaseous (mrem)	1.06E-01		4.58E-01		5.02E-03
Total Dose (mrem)	5.69E-01				

* Includes C-14 dose.

3. Dose to Members of the Public Due to Activities inside the Site Boundary

In accordance with 10 CFR 20.1301 Members of the Public may receive up to a limit of 100 mrem Total Effective Dose Equivalent (TEDE) in a year. The TEDE dose is the combined organ Committed Dose Equivalent (CDE) and the Total Body Dose. The Total Body Dose includes the direct shine dose from the ISFSI. There were no liquid or airborne releases from the ISFSI. The dose from radioactive liquid and gaseous effluents to a Member of the Public performing activities inside the site boundary are to be calculated as required by ODCM 6.9.1.8 (SGS) and 6.9.1.7 (HCGS).

Two sets of TEDE doses were calculated to two different members of the public. The first TEDE dose calculation assumes that an adult emergency worker (i.e. National Guard, Police, etc.) was located at the site vehicle Security Checkpoint entrance. The second calculation was to an adult contract worker stationed at the Sewage Treatment Plant (STP). Both sets of members of the public have assigned duties that do not involve exposure to radiation or to radioactive material. Neither group have Radiation Control Access. In addition, exposure time was limited to 2000 hours in a year (0.25 occupancy).

The vehicle Security Checkpoint was located at 0.89 miles E from the gaseous release points for SGS Units 1 and 2, 0.94 miles E from the HCGS and 1.18 miles from the ISFSI. The STP workers were located about 575 feet SW from the ISFSI pad.

The active exposure pathways at both locations were plume immersion, ground deposition and inhalation of airborne radioactivity in gaseous effluent. There was no liquid dose pathway to Members of the Public on site.

The 2019 atmospheric dispersion factors were imputed into the GASPAR computer program to calculate the gaseous effluent doses. For purposes of these calculations the gaseous doses for the STP worker used the highest site boundary sector doses located in the SW sector.

The calculated TEDE dose from gaseous effluents from the three reactors for each location was calculated by summing the total body and highest organ doses from SGS U1, SGS U2 and HCGS. The ISFSI dose was then added to each and then compared to the 10 CFR 20.1301 limit of 100 mrem. The results of this analysis are in Table 7.

Table 7
Summary of TEDE doses to Members of the Public
Due to Activities Inside the Site Boundary

Location	Operating Unit	CDE (Thyroid) mrem	Total Body Dose mrem	TEDE mrem	% of Limit (100 mrem) per 10 CFR 20.1301
Security Checkpoint	SGS U1	1.67E-03	1.67E-03		
	SGS U2	8.96E-04	8.96E-04		
	HCGS	2.51E-03	2.50E-03		
	ISFSI	N/A	1.88E-02		
	Total	5.08E-03	2.39E-02		
STP	SGS U1	5.76E-03	5.75E-03		
	SGS U2	3.08E-03	3.08E-03		
	HCGS	1.07E-01	1.06E-01		
	ISFSI	N/A	2.24E+00		
	Total	1.15E-01	2.35E+00		

N/A Not Applicable

The calculated doses were well below the 100 mrem limit of 10 CFR 20.1301.

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APPENDIX A-1

Effluent and Waste Disposal Summary, SGS Unit 1

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

Facility: SGS Unit 1

Period: 2019

A. Fission & Activation Gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
Total Release	Ci	9.43E-02	1.10E-01	4.56E-02	5.92E-02	3.09E-01	3.400E+01
Average release rate for the period	μCi/sec	1.21E-02	1.40E-02	5.74E-03	7.44E-03	9.81E-03	
Percent of limit (ODCM 3.11.2.2(a))	Gamma Air % Beta Air %	See Table 2 on page 18					
B. Iodine and Halogens							
Total	Ci	1.12E-04	7.24E-06	< LLD	< LLD	1.20E-04	3.00E+01
Average release rate for the period	μCi/sec	1.45E-05	9.20E-07	N/A	N/A	3.79E-06	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
C. Particulates							
Particulates with half-lives > 8 days	Ci	3.75E-05	2.23E-05	< LLD	< LLD	5.97E-05	3.00E+01
Average release rate for the period	μCi/sec	4.82E-06	2.83E-06	N/A	N/A	1.89E-06	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
Gross alpha radioactivity	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	
D. Tritium							
Total Release	Ci	4.87E+01	8.67E+01	5.86E+01	4.32E+01	2.37E+02	3.10E+01
Average release rate for the period	μCi/sec	6.27E+00	1.10E+01	7.37E+00	5.43E+00	7.52E+00	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
E. C-14							
Total Release	Ci	2.22E+00	2.15E+00	2.33E+00	2.37E+00	9.07E+00	N/A ^a
Average release rate for the period	μCi/sec	2.85E-01	2.74E-01	2.93E-01	2.98E-01	2.88E-01	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
F. I-131, I-133, H-3 & Particulates > 8 day half-life							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					
G. I-131, I-133, H-3, Particulates > 8 day half-life & C-14							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					

N/A Not Applicable

* Iodine, Tritium, C-14, and Particulates were treated as a group. Although listed separately in the above table, the percent ODCM Limit is based on most limiting nuclide and organ dose for the group (even in cases when a sub-group member was not identified in effluents).

^a It is not necessary to calculate uncertainties for C-14 or to include C-14 uncertainty in any subsequent calculation of overall uncertainty. (Regulatory Guide 1.21 revision 2)

TABLE 1C-1

GASEOUS EFFLUENTS – GROUND LEVEL RELEASES

Facility: SGS Unit 1

Period: 2019

Nuclides Released		Continuous Mode					Batch Mode				
1.Fission gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Ar-41	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	5.62E-02	9.81E-03	3.61E-02	4.52E-02	1.47E-01
Kr-85m	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	2.36E-04	< LLD	< LLD	2.36E-04
Xe-133m	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.37E-03	< LLD	< LLD	1.37E-03
Xe-133	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	3.80E-02	8.49E-02	9.55E-03	1.40E-02	1.46E-01
Xe-135	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	1.08E-04	1.38E-02	< LLD	< LLD	1.39E-02
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	9.43E-02	1.10E-01	4.56E-02	5.92E-02	3.09E-01
2. Iodines and Halogens											
Br-82	Ci	< LLD	7.24E-06	< LLD	< LLD	7.24E-06	< LLD	< LLD	< LLD	< LLD	< LLD
I-131	Ci	1.15E-06	< LLD	< LLD	< LLD	1.15E-06	< LLD	< LLD	< LLD	< LLD	< LLD
I-133	Ci	1.11E-04	< LLD	< LLD	< LLD	1.12E-04	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	1.12E-04	7.24E-06	< LLD	< LLD	1.20E-04	< LLD	< LLD	< LLD	< LLD	< LLD
3. Particulates											
Co-58	Ci	< LLD	2.22E-05	< LLD	< LLD	2.22E-05	< LLD	< LLD	< LLD	< LLD	< LLD
Co-60	Ci	< LLD	3.09E-08	< LLD	< LLD	3.09E-08	< LLD	< LLD	< LLD	< LLD	< LLD
As-76	Ci	3.75E-05	< LLD	< LLD	< LLD	3.75E-05	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	3.75E-05	2.23E-05	< LLD	< LLD	5.97E-05	< LLD	< LLD	< LLD	< LLD	< LLD
4. Tritium	Ci	4.84E+01	8.65E+01	5.70E+01	4.16E+01	2.34E+02	3.25E-01	1.29E-01	1.55E+00	1.54E+00	3.54E+00
5. C-14	Ci	2.22E+00	2.15E+00	2.33E+00	2.37E+00	9.07E+00	< LLD	< LLD	< LLD	< LLD	< LLD

Note: Only radionuclides with positive activity reported in this table.

TABLE 2A-1

LIQUID EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: SGS Unit 1

Period: 2019

A. Fission & Activation Products	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
1. Total Release (not including tritium, gases & alpha)	Ci	2.18E-03	4.55E-03	1.39E-03	1.31E-04	8.25E-03	2.70E+01
2. Average diluted concentration during period	µCi/ml	3.74E-11	8.03E-11	2.86E-11	2.57E-12	3.84E-11	
3. Percent of applicable limit (ODCM 3.11.1(a) & (b))	Total Body % Organ %	See Table 3 on page 20					
B. Tritium							
1. Total List	Ci	4.01E+02	4.21E+02	5.76E+01	1.13E+02	9.92E+02	2.70E+01
2. Average diluted concentration during period	µCi/ml	6.87E-06	7.43E-06	1.19E-06	2.20E-06	4.62E-06	
3. Percent of applicable limit (ODCM 3.11.1(a) & (b))	Total Body % Organ %	See Table 3 on page 20					
C. Dissolved & Entrained Gases							
1. Total Release	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.70E+01
2. Average diluted concentration during period	µCi/ml	N/A	N/A	N/A	N/A	N/A	
3. Percent of applicable limit (ODCM 3.11.1.1)	%	N/A	N/A	N/A	N/A	N/A	
D. Gross Alpha Activity							
Total Release	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.70E+01
E. Volume Of Waste Released (prior to dilution)							
	Liters	4.07E+07	3.12E+07	2.88E+07	4.31E+07	1.44E+08	
F. Volume Of Dilution Water Used During Period							
	Liters	5.83E+10	5.66E+10	4.85E+10	5.11E+10	2.14E+11	

N/A Not Applicable

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

TABLE 2B-1

LIQUID EFFLUENTS

Facility: SGS Unit 1

Period: 2019

Nuclides Released	Unit	Continuous Mode					Batch Mode				
		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
H-3	Ci	3.09E-02	1.89E-02	3.57E-02	9.72E-02	1.83E-01	4.01E+02	4.21E+02	5.76E+01	1.12E+02	9.92E+02
Fission & Activation Products											
Co-58	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	9.05E-04	3.62E-03	7.96E-04	1.91E-05	5.34E-03
Co-60	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	7.65E-04	8.94E-04	5.92E-04	1.11E-04	2.36E-03
Nb-95	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.32E-05	1.32E-05	< LLD	1.32E-05
Nb-97	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	5.11E-06	< LLD	< LLD	< LLD	5.11E-06
Ag-110m	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	5.20E-06	< LLD	< LLD	< LLD	5.20E-06
Sb-125	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.29E-05	2.02E-05	< LLD	< LLD	4.30E-05
Cs-134	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.33E-05	< LLD	< LLD	< LLD	2.33E-05
Cs-137	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	4.43E-04	< LLD	< LLD	9.93E-07	4.54E-04
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.18E-03	4.55E-03	1.39E-03	1.31E-04	8.25E-03
Dissolved and Entrained Noble Gases											
None	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD

Note: Only radionuclides with positive activity reported in this table.

TABLE 4A-1

SUMMARY SHEET FOR LIQUID RADIOACTIVE EFFLUENTS RELEASED IN A BATCH MODE

Facility: SGS Unit 1

Period: 2019

Liquid	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Batch Releases	24	38	10	12	84
Total time period for batch releases (min)	9.80E+03	1.99E+04	3.80E+03	5.03E+03	3.85E+04
Maximum time period for batch release (min)	6.92E+02	1.96E+03	5.37E+02	6.86E+02	1.96E+03
Average time period for batch release (min)	4.08E+02	5.23E+02	3.80E+02	4.19E+02	4.59E+02
Minimum time period for batch release (min)	2.27E+02	6.70E+01	2.51E+02	1.50E+01	1.50E+01
Average stream flow during periods of release of effluents into a flowing stream (Lpm)	5.95E+06	2.85E+06	1.28E+07	1.02E+07	5.56E+06

TABLE 4B-1

SUMMARY SHEET FOR GASEOUS RADIOACTIVE EFFLUENTS RELEASED IN A BATCH MODE

Facility: SGS Unit 1

Period: 2019

Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Batch Releases	17	19	14	5	55
Total time period for batch releases (min)	1.25E+05	3.09E+04	1.19E+05	1.33E+05	4.08E+05
Maximum time period for batch release (min)	3.45E+04	2.58E+04	4.64E+04	4.46E+04	4.46E+04
Average time period for batch release (min)	7.33E+03	1.63E+03	8.51E+03	2.66E+04	7.42E+03
Minimum time period for batch release (min)	3.90E+01	4.80E+01	2.20E+01	1.04E+02	3.90E+01

APPENDIX A-2

Effluent and Waste Disposal Summary, SGS Unit 2

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TABLE 1A-2

GASEOUS EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: SGS Unit 2

Period: 2019

A. Fission & Activation Gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
Total Release	Ci	5.17E-02	4.42E-02	5.23E-02	7.55E-02	2.24E-01	3.400E+01
Average release rate for the period	µCi/sec	6.65E-03	5.62E-03	6.59E-03	9.49E-03	7.09E-03	
Percent of limit (ODCM 3.11.2.2(a))	Gamma Air % Beta Air %	See Table 2 on page 18					
B. Iodine and Halogens							
Total	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	3.00E+01
Average release rate for the period	µCi/sec	< LLD	< LLD	< LLD	< LLD	< LLD	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
C. Particulates							
Particulates with half-lives > 8 days	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	3.00E+01
Average release rate for the period	µCi/sec	< LLD	< LLD	< LLD	< LLD	< LLD	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
Gross alpha radioactivity	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	
D. Tritium							
Total Release	Ci	3.69E+00	3.84E+01	3.01E+01	3.72E+01	1.09E+02	3.10E+01
Average release rate for the period	µCi/sec	4.75E-01	4.88E+00	3.79E+00	4.68E+00	3.47E+00	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
E. C-14							
Total Release	Ci	2.75E+00	2.73E+00	2.84E+00	3.05E+00	1.14E+01	N/A ^a
Average release rate for the period	µCi/sec	3.53E-01	3.47E-01	3.58E-01	3.83E-01	3.60E-01	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
F. I-131, I-133, H-3 & Particulates > 8 day half-life							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					
G. I-131, I-133, H-3, Particulates > 8 day half-life & C-14							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					

* Iodine, Tritium, C-14, and Particulates were treated as a group. Although listed separately in the above table, the percent ODCM Limit is based on most limiting nuclide and organ dose for the group (even in cases when a sub-group member was not identified in effluent).

^a It is not necessary to calculate uncertainties for C-14 or to include C-14 uncertainty in any subsequent calculation of overall uncertainty. (Regulatory Guide 1.21 revision 2)

TABLE 1C-2

GASEOUS EFFLUENTS – GROUND LEVEL RELEASES

Facility: SGS Unit 2

Period: 2019

Nuclides Released		Continuous Mode					Batch Mode				
1. Fission gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Ar-41	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	4.69E-02	4.42E-02	3.85E-02	7.55E-02	2.05E-01
Xe-133m	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	4.65E-04	< LLD	4.65E-04
Xe-133	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	4.86E-03	< LLD	1.29E-02	< LLD	1.78E-02
Xe-135	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	4.64E-04	< LLD	4.64E-04
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	5.17E-02	4.42E-02	5.23E-02	7.55E-02	2.24E-01
2. Iodines and Halogens											
None	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD
3. Particulates											
None	Ci	< LLD	< LLD	< LLD	1.38E-06	1.38E-06	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	< LLD	< LLD	< LLD	4.65E-06	4.65E-06	< LLD	< LLD	< LLD	< LLD	< LLD
4. Tritium	Ci	3.65E+00	3.83E+01	3.01E+01	3.68E+01	1.09E+02	3.74E-02	1.75E-02	6.47E-02	3.98E-01	5.17E-01
5. C-14	Ci	2.75E+00	2.73E+00	2.84E+00	3.05E+00	1.14E+01	< LLD	< LLD	< LLD	< LLD	< LLD

Note: Only radionuclides with positive activity reported in this table.

TABLE 2A-2

LIQUID EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: SGS Unit 2

Period: 2019

A. Fission & Activation Products	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
1. Total Release (not including tritium, gases & alpha)	Ci	1.48E-03	8.08E-03	2.31E-03	1.26E-03	1.31E-02	2.70E+01
2. Average diluted concentration during period	µCi/ml	4.23E-10	1.34E-09	8.55E-11	3.73E-10	3.29E-10	See Table 3 on page 20
3. Percent of applicable limit (ODCM 3.11.1(a) & (b))	Total Body % Organ %						
B. Tritium							
1. Total Release	Ci	1.29E+02	8.67E+01	6.75E+01	1.63E+02	4.46E+02	2.70E+01
2. Average diluted concentration during period	µCi/ml	3.69E-05	1.44E-05	2.50E-06	4.83E-05	1.12E-05	See Table 3 on page 20
3. Percent of applicable limit (ODCM 3.11.1(a) & (b))	Total Body % Organ %						
C. Dissolved & Entrained Gases							
1. Total Release	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.70E+01
2. Average diluted concentration during period	µCi/ml	< LLD	< LLD	< LLD	< LLD	< LLD	
3. Percent of applicable limit (ODCM 3.11.1.1)	%	N/A	N/A	N/A	N/A	N/A	
D. Gross Alpha Activity							
Total Release	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.70E+01
E. Volume Of Waste Released (prior to dilution)							
	Liters	1.32E+07	1.43E+07	1.61E+07	2.37E+07	6.73E+07	
F. Volume Of Dilution Water Used During Period							
	Liters	3.48E+09	6.01E+09	2.70E+10	3.35E+09	3.98E+10	

N/A Not Applicable

TABLE 2B-2
LIQUID EFFLUENTS

Facility: SGS Unit 2

Period: 2019

	Unit	Continuous Mode					Batch Mode				
		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
H-3	Ci	7.93E-03	< LLD	2.14E-03	< LLD	1.01E-02	1.29E+02	8.67E+01	6.75E+01	1.63E+02	4.46E+02
Fission and Activation Products											
Cr-51	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	3.27E-05	1.26E-04	< LLD	< LLD	1.59E-04
Mn-54	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	2.72E-05	< LLD	< LLD	2.72E-05
Co-57	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.74E-05	< LLD	< LLD	1.74E-05
Co-58	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	6.76E-04	5.77E-03	9.97E-04	6.91E-05	7.51E-03
Co-60	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	6.94E-04	1.74E-03	1.31E-03	1.19E-03	4.93E-03
Zr-95	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.46E-05	1.03E-04	< LLD	< LLD	1.28E-04
Nb-95	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	4.96E-05	2.17E-04	< LLD	< LLD	2.67E-04
Sb-125	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	8.11E-05	< LLD	< LLD	8.11E-05
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	1.48E-03	8.08E-03	2.31E-03	1.26E-03	1.31E-02
Dissolved and Entrained Noble Gases											
None	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD

Note: Only radionuclides with positive activity reported in this table.

**TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL
(Not Irradiated Fuel)**

Facility: SGS Units 1 and 2

Period: 2019

**b. Waste Stream; Resins, Filters, and Evaporator Bottoms
Liquid Waste Processing Resin**

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	5.50E+02	1.56E+01	8.49E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	5.50E+02	1.56E+01	8.49E+00	+/-25%
Major Nuclides for Above Table:			Percent Cutoff 1%	
Resins, Filters and Evaporator Bottoms Waste Class A				
Nuclide Name	Percent Abundance		Curies	
Fe-55	4.34%		3.68E-01	
Co-58	47.53%		4.03E+00	
Co-60	11.14%		9.45E-01	
Ni-63	30.89%		2.62E+00	
Sb-125	2.39%		2.03E-01	
Cs-137	1.52%		1.29E-01	
Resins, Filters and Evaporator Bottoms Waste Class B				
Nuclide Name	Percent Abundance		Curies	
None				
Resins, Filters and Evaporator Bottoms Waste Class C				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Resins, Filters and Evaporator Bottoms Waste Class All				
Nuclide Name	Percent Abundance		Curies	
Fe-55	4.34%		3.68E-01	
Co-58	47.53%		4.03E+00	
Co-60	11.14%		9.45E-01	
Ni-63	30.89%		2.62E+00	
Sb-125	2.39%		2.03E-01	
Cs-137	1.52%		1.29E-01	

N/A Not Applicable

**TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

c. Waste Stream; Dry Active Waste

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	1.94E+04	5.49E+02	1.74E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	1.94E+04	5.49E+02	1.74E+00	+/-25%

Major Nuclides for Above Table: Percent Cutoff 1%

Dry Active Waste

Waste Class A

Nuclide Name	Percent Abundance	Curies
H-3	1%	1.75E-02
Cr-51	2.64%	4.61E-02
Mn-54	1.68%	2.94E-02
Fe-55	10.71%	1.87E-01
Co-58	23.46%	4.09E-01
Co-60	31.63%	5.52E-01
Ni-63	16.64%	2.90E-01
Zr-95	4.95%	8.63E-02
Nb-95	2.52%	4.40E-02
Sb-125	2.1%	3.66E-02
Cs-137	1.15%	2.01E-02

Dry Active Waste

Waste Class B

Nuclide Name	Percent Abundance	Curies
None	N/A	N/A

Dry Active Waste

Waste Class C

Nuclide Name	Percent Abundance	Curies
None	N/A	N/A

Dry Active Waste

Waste Class All

Nuclide Name	Percent Abundance	Curies
H-3	1%	1.75E-02
Cr-51	2.64%	4.61E-02
Mn-54	1.68%	2.94E-02
Fe-55	10.71%	1.87E-01
Co-58	23.46%	4.09E-01
Co-60	31.63%	5.52E-01
Ni-63	16.64%	2.90E-01
Zr-95	4.95%	8.63E-02
Nb-95	2.52%	4.40E-02
Sb-125	2.1%	3.66E-02
Cs-137	1.15%	2.01E-02

N/A Not Applicable

**TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

d. Waste Stream; Irradiated Components

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	0.00E+00	0.00E+00	0.00E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	0.00E+00	0.00E+00	0.00E+00	+/-25%
Major Nuclides for Above Table:				Percent Cutoff 1%
Irradiated Components				
Waste Class A				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Irradiated Components				
Waste Class B				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Irradiated Components				
Waste Class C				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Irradiated Components				
Waste Class All				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	

N/A Not Applicable

**TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

e. Waste Stream; Other Waste

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	0.00E+00	0.00E+00	0.00E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	0.00E+00	0.00E+00	0.00E+00	+/-25%
Major Nuclides for Above Table: Percent Cutoff 1%				
Other Waste				
Waste Class A				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	
Other Waste				
Waste Class B				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	
Other Waste				
Waste Class C				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	
Other Waste				
Waste Class All				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	

N/A Not Applicable

**TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

f. Waste Stream; Sum of All 4 Categories

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	1.99E+04	5.64E+02	1.02E+01	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	1.99E+04	5.64E+02	1.02E+01	+/-25%
Major Nuclides for Above Table:				Percent Cutoff 1%
Waste Stream; Sum of All 4 Categories				
Waste Class A				
Nuclide Name	Percent Abundance		Curies	
Fe-55	5.43%		5.55E-01	
Co-58	43.43%		4.44E+00	
Co-60	14.64%		1.50E+00	
Ni-63	28.46%		2.91E+00	
Sb-125	2.34%		2.40E-01	
Cs-137	1.46%		1.49E-0	
Waste Stream; Sum of All 4 Categories				
Waste Class B				
Nuclide Name	Percent Abundance		Curies	
None				
Waste Stream; Sum of All 4 Categories				
Waste Class C				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Waste Stream; Sum of All 4 Categories				
Waste Class All				
Nuclide Name	Percent Abundance		Curies	
Fe-55	5.43%		5.55E-01	
Co-58	43.43%		4.44E+00	
Co-60	14.64%		1.50E+00	
Ni-63	28.46%		2.91E+00	
Sb-125	2.34%		2.40E-01	
Cs-137	1.46%		1.49E-0	

N/A Not Applicable

TABLE 3A-2
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
 (Not Irradiated Fuel)

Number of Shipments	Mode Of Transportation	Destination
1	Hittman Transport Services, Inc.	Barnwell Disposal Facility Operated by Chem-Nuclear Systems, Inc.
4	Hittman Transport Services, Inc.	Barnwell Processing Facility Energy Solutions, LLC
4	Hittman Transport Services, Inc.	Energy Solutions Services Inc. 1560 Bear Creek Road
4	Interstate Ventures	UniTech Processing Facility. 2323 Zirconium Road

TABLE 4A-2

SUMMARY SHEET FOR LIQUID RADIOACTIVE EFFLUENTS RELEASED IN A BATCH MODE

Facility: SGS Unit 2

Period: 2019

Liquid	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Batch Releases	15	16	10	11	52
Total time period for batch releases (min)	4.61E+03	8.10E+03	4.72E+03	4.51E+03	2.19E+04
Maximum time period for batch release (min)	5.48E+02	7.73E+02	6.66E+02	5.43E+02	7.73E+02
Average time period for batch release (min)	3.07E+02	5.06E+02	4.72E+02	4.10E+02	4.22E+02
Minimum time period for batch release (min)	1.00E+00	3.24E+02	3.37E+02	1.62E+02	1.00E+00
Average stream flow during periods of release of effluents into a flowing stream (Lpm)	7.57E+05	7.44E+05	5.72E+06	7.49E+05	1.82E+06

TABLE 4B-2

SUMMARY SHEET FOR GASEOUS RADIOACTIVE EFFLUENTS RELEASED IN A BATCH MODE

Facility: SGS Unit 2

Period: 2019

Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Batch Releases	14	7	8	3	32
Total time period for batch releases (min)	1.23E+05	1.03E+05	1.23E+05	1.33E+05	4.82E+05
Maximum time period for batch release (min)	3.85E+04	3.33E+04	4.46E+04	4.46E+04	4.46E+04
Average time period for batch release (min)	8.79E+03	1.47E+04	1.54E+04	4.42E+04	1.51E+04
Minimum time period for batch release (min)	1.90E+01	3.50E+01	5.80E+01	4.32E+04	1.90E+01

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APPENDIX A-3

Effluent and Waste Disposal Summary, HCGS

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TABLE 1A-3

GASEOUS EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: HCGS

Period: 2019

A. Fission & Activation Gases	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %
Total Release	Ci	2.50E+00	2.51E-02	2.45E+01	4.56E+00	3.16E+01	3.40E+01
Average release rate for the period	µCi/sec	3.21E-01	3.19E-03	3.09E+00	5.74E-01	1.00E+00	
Percent of limit (ODCM 3.11.2.2(a))	Gamma Air %	See Table 2 on page 18					
	Beta Air %						
B. Iodines and Halogens							
Total Release	Ci	3.80E-04	4.08E-06	6.62E-05	1.21E-04	5.72E-04	3.00E+01
Average release rate for the period	µCi/sec	4.89E-05	5.18E-07	8.33E-06	1.53E-05	1.81E-05	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
C. Particulates							
Particulates with half-lives > 8 days	Ci	4.26E-06	< LLD	6.39E-06	4.31E-05	5.38E-05	3.00E+01
Average release rate for the period	µCi/sec	5.48E-07	< LLD	8.04E-07	5.43E-06	1.71E-06	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
Gross alpha radioactivity	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	
D. Tritium							
Total Release	Ci	1.12E+02	1.15E+02	1.16E+02	4.09E+01	3.84E+02	3.10E+01
Average release rate for the period	µCi/sec	1.71E-06	1.71E-06	1.71E-06	1.71E-06	1.71E-06	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
E. C-14							
Total Release	Ci	3.38E+00	3.69E+00	3.71E+00	4.18E+00	1.50E+01	N/A
Average release rate for the period	µCi/sec	4.35E-01	4.69E-01	4.67E-01	5.26E-01	4.74E-01	
Percent of limit (ODCM 3.11.2.3(a))	%	*	*	*	*	*	
F. I-131, I-133, H-3 & Particulates > 8 day half-life							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					
G. I-131, I-133, H-3, Particulates > 8 day half-life & C-14							
Percent of limit (ODCM 3.11.2.3(a))	%	See Table 2 on page 18					

* Iodine, Tritium, C-14, and Particulates were treated as a group. Although listed separately in the above table, the percent ODCM Limit is based on most limiting nuclide and organ dose for the group (even in cases when a sub-group member was not identified in effluent).

a. It is not necessary to calculate uncertainties for C-14 or to include C-14 uncertainty in any subsequent calculation of overall uncertainty. (Regulatory Guide 1.21 revision 2)

TABLE 1C-3

GASEOUS EFFLUENTS – GROUND LEVEL RELEASES

Facility: HCGS

Period: 2019

Nuclides Released	Unit	Continuous Mode					Batch Mode				
		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
1. Fission gases											
Ar-41	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.87E-03	1.87E-03
Kr-85m	Ci	7.49E-02	< LLD	< LLD	< LLD	7.49E-02	< LLD	< LLD	< LLD	3.41E-05	3.41E-05
Kr-87	Ci	4.99E-02	< LLD	< LLD	< LLD	4.99E-02	< LLD	< LLD	< LLD	6.43E-04	6.43E-04
Kr-88	Ci	9.98E-02	< LLD	< LLD	< LLD	9.98E-02	< LLD	< LLD	< LLD	4.29E-04	4.29E-04
Xe-133	Ci	1.52E+00	< LLD	< LLD	< LLD	1.52E+00	1.57E-03	2.50E-02	< LLD	9.72E-04	2.75E-02
Xe-135m	Ci	4.99E-02	< LLD	< LLD	< LLD	4.99E-02	< LLD	< LLD	< LLD	< LLD	< LLD
Xe-135	Ci	6.99E-01	< LLD	7.58E+00	1.16E+00	9.44E+00	9.17E-05	7.31E-05	< LLD	4.16E-04	5.81E-04
Xe-138	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	2.85E-03	2.85E-03
Total for Period	Ci	2.50E+00	< LLD	2.45E+01	4.56E+00	3.16E+01	1.66E-03	2.51E-02	< LLD	7.22E-03	3.39E-02
2. Iodines and Halogens											
I-131	Ci	1.12E-04	4.08E-06	1.55E-05	8.17E-05	2.13E-04	< LLD	< LLD	< LLD	< LLD	< LLD
I-133	Ci	2.69E-04	< LLD	5.07E-05	3.96E-05	3.59E-04	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	3.80E-04	4.08E-06	6.62E-05	1.21E-04	5.72E-04	< LLD	< LLD	< LLD	< LLD	< LLD
3. Particulates											
Co-60	Ci	4.26E-06	< LLD	6.39E-06	4.31E-05	5.38E-05	< LLD	< LLD	< LLD	< LLD	< LLD
Total for Period	Ci	4.26E-06	< LLD	6.39E-06	4.31E-05	5.38E-05	< LLD	< LLD	< LLD	< LLD	< LLD
4. Tritium											
	Ci	1.12E+02	1.15E+02	1.16E+02	4.09E+01	3.84E+02	1.70E-03	< LLD	< LLD	2.02E-03	3.72E-03
5. C-14											
	Ci	3.38E+00	3.69E+00	3.71E+00	4.18E+00	1.50E+01	< LLD	< LLD	< LLD	< LLD	< LLD

Note: Only radionuclides with positive activity reported in this table.

TABLE 2A-3

LIQUID EFFLUENTS – SUMMATION OF ALL RELEASES

Facility: HCGS

Period: 2019

A. Fission & Activation Products	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Est. Total Error %	
1. Total Release (not including tritium, gases & alpha)	Ci	1.28E-05	9.33E-04	1.75E-04	1.55E-02	1.66E-02	2.70E+01	
2. Average diluted concentration during period	μCi/ml	2.10E-12	1.66E-10	2.77E-11	2.37E-09	6.76E-10		
3. Percent of applicable limit (ODCM 3.11.1(a) & (b))	Total Body % Organ %	See Table 3 on page 20						
B. Tritium								
1. Total Release	Ci	1.15E+01	1.05E+01	2.72E+00	9.23E+01	1.17E+02	2.70E+01	
2. Average diluted concentration during period	μCi/ml	1.89E-06	1.87E-06	4.32E-07	1.41E-05	4.77E-06		
3. Percent of applicable limit (ODCM 3.11.1(a) & (b))	Total Body % Organ %	See Table 3 on page 20						
C. Dissolved & Entrained Gases								
1. Total Release	Ci	1.44E-03	2.63E-04	5.62E-05	2.78E-04	2.03E-03	2.70E+01	
2. Average diluted concentration during period	μCi/ml	2.36E-10	4.69E-11	8.92E-12	4.25E-11	8.29E-11		
3. Percent of applicable limit (ODCM 3.11.1.1)	%	See Table 3 on page 20						
D. Gross Alpha Activity								
Total Release	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	2.70E+01	
E. Volume Of Waste Released (prior to dilution)								
	Liters	1.60E+07	2.12E+06	2.01E+07	1.41E+07	5.23E+07		
F. Volume Of Dilution Water Used During Period								
	Liters	6.08E+09	5.62E+09	6.28E+09	6.52E+09	2.45E+10		

TABLE 2B-3
LIQUID EFFLUENTS

Facility: HCGS

Period: 2019

Continuous Mode							Batch Mode				
Nuclides Released	Unit	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
H-3	Ci	3.09E-02	1.89E-02	3.57E-02	9.72E-02	1.83E-01	4.01E+02	4.21E+02	5.76E+01	1.12E+02	9.91E+02
Fission and Activation Products											
Cr-51	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	4.58E-05	4.58E-05
Mn-54	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	8.02E-08	3.49E-05	1.30E-05	2.49E-03	2.54E-03
Co-58	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	9.53E-06	1.91E-03	1.92E-03
Co-60	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	1.27E-05	8.74E-04	1.34E-04	4.81E-03	5.84E-03
Zn-65	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.79E-05	1.50E-04	1.68E-04
Sb-122	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.39E-04	1.39E-04
Sb-124	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	3.27E-03	3.27E-03
Sb-125	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	6.48E-04	6.48E-04
I-131	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	3.40E-04	3.40E-04
I-133	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	1.42E-07	1.42E-07
Cs-134	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	8.66E-04	8.66E-04
Cs-136	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	2.18E-05	2.18E-05
Cs-137	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	< LLD	2.45E-05	< LLD	7.97E-04	8.21E-04
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	1.28E-05	9.33E-04	1.75E-04	1.55E-02	1.66E-02
Dissolved and Entrained Noble Gases											
Xe-133	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	1.41E-03	2.63E-04	4.38E-05	2.76E-04	1.99E-03
Xe-135		< LLD	< LLD	< LLD	< LLD	< LLD	2.70E-05	0.00E+00	1.24E-05	1.61E-06	4.10E-05
Total for Period	Ci	< LLD	< LLD	< LLD	< LLD	< LLD	1.44E-03	2.63E-04	5.62E-05	2.78E-04	2.03E-03

Note: Only radionuclides with positive activity reported in this table.

**TABLE 3A-3
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL
(Not Irradiated Fuel)**

Facility: HCGS

Period: 2019

a. Waste Stream; Resins, Filters, and Evaporator Bottoms

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	2.85E+03	8.06E+01	5.93E+01	+/-25%
B	9.30E+01	2.63E+00	7.13E+01	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	2.94E+03	8.33E+01	1.31E+02	+/-25%
Major Nuclides for Above Table: Percent Cutoff: 1%				
Resins, Filters and Evaporator Bottoms				
Waste Class A				
Nuclide Name	Percent Abundance		Curies	
C-14	6.26%		3.71E+00	
Mn-54	8.3%		4.92E+00	
Fe-55	19.92%		1.18E+01	
Co-60	55.06%		3.26E+01	
Ni-63	6.01%		3.56E+00	
Zn-65	1.56%		9.24E-01	
Cs-137	1.39%		8.24E-01	
Resins, Filters and Evaporator Bottoms				
Waste Class B				
Nuclide Name	Percent Abundance		Curies	
Fe-55	59.69%		4.25E+01	
Co-60	29.6%		2.11E+01	
Ni-63	9.47%		6.75E+00	
Cs-137	1%		7.13E-01	
Resins, Filters and Evaporator Bottoms				
Waste Class C				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Resins, Filters and Evaporator Bottoms				
Waste Class All				
Nuclide Name	Percent Abundance		Curies	
C-14	2.84%		3.71E+00	
Mn-54	3.77%		4.92E+00	
Fe-55	41.64%		5.44E+01	
Co-60	41.16%		5.37E+01	
Ni-63	7.9%		1.03E+01	
Cs-137	1.18%		1.54E+00	

N/A Not Applicable

**TABLE 3A-3
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

b. Waste Stream; Dry Active Waste

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	0.00E+00	0.00E+00	0.00E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	0.00E+00	0.00E+00	0.00E+00	+/-25%
Major Nuclides for Above Table:			Percent Cutoff: 1%	
Dry Active Waste				
Waste Class A				
Nuclide Name		Percent Abundance		Curies
None		N/A		N/A
Dry Active Waste				
Waste Class B				
Nuclide Name		Percent Abundance		Curies
None		N/A		N/A
Dry Active Waste				
Waste Class C				
Nuclide Name		Percent Abundance		Curies
None		N/A		N/A
Dry Active Waste				
Waste Class All				
Nuclide Name		Percent Abundance		Curies
None		N/A		N/A

N/A Not Applicable

**TABLE 3A-3
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

c. Waste Stream; Irradiated Components

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	0.00E+00	0.00E+00	0.00E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	1.58E+01	4.48E+01	2.68E+04	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All				+/-25%
Major Nuclides for Above Table:				Percent Cutoff: 1%
Irradiated Components				
Waste Class A				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Irradiated Components				
Waste Class B				
Nuclide Name	Percent Abundance		Curies	
None	N/A		N/A	
Irradiated Components				
Waste Class C				
Nuclide Name	Percent Abundance		Curies	
Mn-54	2.24%		6.02E+02	
Fe-55	54.12%		1.45E+04	
Co-60	36.88%		9.90E+03	
Ni-63	6.39%		1.72E+03	
Irradiated Components				
Waste Class All				
Nuclide Name	Percent Abundance		Curies	
Mn-54	2.24%		6.02E+02	
Fe-55	54.12%		1.45E+04	
Co-60	36.88%		9.90E+03	
Ni-63	6.39%		1.72E+03	

N/A Not Applicable

**TABLE 3A-3
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

d. Waste Stream; Other Waste

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	0.00E+00	0.00E+00	0.00E+00	+/-25%
B	0.00E+00	0.00E+00	0.00E+00	+/-25%
C	0.00E+00	0.00E+00	0.00E+00	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	0.00E+00	0.00E+00	0.00E+00	+/-25%
Major Nuclides for Above Table:			Percent Cutoff: 1%	
Other Waste				
Waste Class A				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	
Other Waste				
Waste Class B				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	
Other Waste				
Waste Class C				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	
Other Waste				
Waste Class All				
Nuclide Name		Percent Abundance	Curies	
None		N/A	N/A	

N/A Not Applicable

**TABLE 3A-3
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

e. Waste Stream; Sum of All 4 Categories

Waste Class	Volume		Curies Shipped	% Error (Activity)
	ft ³	m ³		
A	2.85E+03	8.06E+01	5.93E+0	+/-25%
B	9.30E+01	2.63E+00	7.13E+01	+/-25%
C	1.58E+01	4.48E-01	2.68E+04	+/-25%
Unclassified	0.00E+00	0.00E+00	0.00E+00	+/-25%
All	2.96E+03	8.37E+01	2.70E+04	+/-25%
Major Nuclides for Above Table:			Percent Cutoff: 1%	
Sum of All 4 Categories				
Waste Class A				
Nuclide Name	Percent Abundance		Curies	
C-14	6.26%		3.71E+00	
Mn-54	8.3%		4.92E+00	
Fe-55	19.92%		1.18E+01	
Co-60	55.06%		3.26E+01	
Ni-63	6.01%		3.56E+00	
Zn-65	1.56%		9.24E-01	
Cs-137	1.39%		8.24E-01	
Waste Class B				
Nuclide Name	Percent Abundance		Curies	
Fe-55	59.69%		4.25E+01	
Co-60	29.6%		2.11E+01	
Ni-63	9.47%		6.75E+00	
Cs-137	1%		7.13E-01	
Waste Class C				
Nuclide Name	Percent Abundance		Curies	
Mn-54	2.24%		6.02E+02	
Fe-55	54.12%		1.45E+04	
Co-60	36.88%		9.90E+03	
Ni-63	6.39%		1.72E+03	
Sum of All 4 Categories				
Waste Class All				
Nuclide Name	Percent Abundance		Curies	
Mn-54	2.25%		6.07E+02	
Fe-55	54.06%		1.46E+04	
Co-60	36.9%		9.95E+03	
Ni-63	6.4%		1.73E+03	

N/A Not Applicable

**TABLE 3A-3
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
SOLID RADWASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (continued)
(Not Irradiated Fuel)**

Number of Shipments	Mode Of Transportation	Destination
8	Hittman Transport Services, Inc.	Energy Solutions – BDF Barnwell Disposal Facility.
1	Hittman Transport Services Inc	Energy Solutions, LLC Barnwell Processing Facility
8	Hittman Transport Services, Inc.	Energy Solutions – BDF Barnwell Disposal Facility
5	Hittman Transport Services Inc	Energy Solutions, LLC Barnwell Processing Facility

TABLE 4A-3

SUMMARY SHEET FOR LIQUID RADIOACTIVE EFFLUENTS RELEASED IN A BATCH MODE

Facility: HCGS

Period: 2019

Liquid	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Batch Releases	14	12	29	84	139
Total time period for batch releases (min)	1.07E+03	9.05E+02	2.20E+03	8.79E+03	1.30E+04
Maximum time period for batch release (min)	8.60E+01	8.60E+01	8.90E+01	1.03E+03	1.03E+03
Average time period for batch release (min)	7.62E+01	7.54E+01	7.59E+01	1.05E+02	9.32E+01
Minimum time period for batch release (min)	3.80E+01	4.00E+01	4.10E+01	3.80E+01	3.80E+01
Average stream flow during periods of release of effluents into a flowing stream (Lpm)	5.71E+06	6.21E+06	2.86E+06	7.44E+05	1.89E+06

TABLE 4B-3

SUMMARY SHEET FOR GASEOUS RADIOACTIVE EFFLUENTS RELEASED IN A BATCH MODE

Facility: HCGS

Period: 2019

Gaseous	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Number of Batch Releases	1	1	0	2	4
Total time period for batch releases (min)	1.20E+03	7.26E+02	0.00E+00	1.69E+03	3.62E+03
Maximum time period for batch release (min)	1.20E+03	7.26E+02	0.00E+00	1.25E+03	1.25E+03
Average time period for batch release (min)	1.20E+03	7.26E+02	0.00E+00	8.47E+02	9.05E+02
Minimum time period for batch release (min)	1.20E+03	7.26E+02	0.00E+00	4.41E+02	4.41E+02

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APPENDIX B

Meteorological Data

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Salem/Hope Creek Meteorological Tower

Joint Frequency Distribution of Wind Direction and Speed
All Stability Classes Total Hours and Frequency (%)

33 Ft. Wind Level

150 – 33 Ft. Delta Temperature

January – December 2019

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

**SALEM / HOPE CREEK
 JOINT FREQUENCY DISTRIBUTION OF WIND DIRECTION AND SPEED BY ATMOSPHERIC STABILITY CLASS
 JANUARY - DECEMBER 2019
 WIND LEVEL: 33 FT
 DELTA T: (150-33 FT)
 ALL STABILITY CLASSES
 TOTAL HOURS**

WIND DIRECTION (blowing from)		WIND SPEED GROUPS (m/sec)											Total
		< 0.5	0.5 - 1.0	1.1 - 1.5	1.6 - 2.0	2.1 - 3.0	3.1 - 4.0	4.1 - 5.0	5.1 - 6.0	6.1 - 8.0	8.1 - 10.0	> 10.0	
Degrees	Sect.												
348.75 - 11.25	N	0	12	42	53	177	142	77	26	15	2	0	546
11.25 - 33.75	NNE	1	13	42	48	192	117	67	58	36	0	0	574
33.75 - 56.25	NE	0	14	42	85	199	113	38	30	4	0	0	525
56.25 - 78.75	ENE	0	24	65	89	115	60	28	19	2	0	1	403
78.75 - 101.25	E	0	19	75	68	109	35	13	3	1	0	0	323
101.25 - 123.75	ESE	0	11	26	46	140	57	17	8	5	1	0	311
123.75 - 146.25	SE	0	7	17	31	133	125	148	138	152	18	1	770
146.25 - 168.75	SSE	0	7	22	46	110	92	111	83	78	7	3	559
168.75 - 191.25	S	0	9	22	52	113	90	79	61	44	13	6	489
191.25 - 213.75	SSW	0	5	30	50	114	89	50	38	25	6	1	408
213.75 - 236.25	SW	0	9	22	47	186	138	58	29	10	1	1	501
236.25 - 258.75	WSW	0	7	21	45	179	142	57	13	13	0	1	478
258.75 - 281.25	W	1	9	25	50	124	115	69	34	57	31	11	526
281.25 - 303.75	WNW	0	9	32	48	125	81	60	51	106	34	9	555
303.75 - 326.25	NW	1	13	27	52	189	155	127	121	150	46	4	885
326.25 - 348.75	NNW	0	9	34	52	155	109	88	70	38	0	0	555

Total 8,408

MISSING HOURS: 352
 JOINT DATA RECOVERY: 96.0%

**SALEM / HOPE CREEK
 JOINT FREQUENCY DISTRIBUTION OF WIND DIRECTION AND SPEED BY ATMOSPHERIC STABILITY CLASS
 JANUARY - DECEMBER 2019
 WIND LEVEL: 33 FT
 DELTA T: (150-33 FT)
 ALL STABILITY CLASSES
 FREQUENCY (%)**

WIND DIRECTION (blowing from)		WIND SPEED GROUPS (m/sec)											Total
		< 0.5	0.5 - 1.0	1.1 - 1.5	1.6 - 2.0	2.1 - 3.0	3.1 - 4.0	4.1 - 5.0	5.1 - 6.0	6.1 - 8.0	8.1 - 10.0	> 10.0	
Degrees	Sect.												
348.75 - 11.25	N	0.000	0.143	0.500	0.630	2.105	1.689	0.916	0.309	0.178	0.024	0.000	6.49
11.25 - 33.75	NNE	0.012	0.155	0.500	0.571	2.284	1.392	0.797	0.690	0.428	0.000	0.000	6.83
33.75 - 56.25	NE	0.000	0.167	0.500	1.011	2.367	1.344	0.452	0.357	0.048	0.000	0.000	6.24
56.25 - 78.75	ENE	0.000	0.285	0.773	1.059	1.368	0.714	0.333	0.226	0.024	0.000	0.012	4.79
78.75 - 101.25	E	0.000	0.226	0.892	0.809	1.296	0.416	0.155	0.036	0.012	0.000	0.000	3.84
101.25 - 123.75	ESE	0.000	0.131	0.309	0.547	1.665	0.678	0.202	0.095	0.059	0.012	0.000	3.70
123.75 - 146.25	SE	0.000	0.083	0.202	0.369	1.582	1.487	1.760	1.641	1.808	0.214	0.012	9.16
146.25 - 168.75	SSE	0.000	0.083	0.262	0.547	1.308	1.094	1.320	0.987	0.928	0.083	0.036	6.65
168.75 - 191.25	S	0.000	0.107	0.262	0.618	1.344	1.070	0.940	0.725	0.523	0.155	0.071	5.82
191.25 - 213.75	SSW	0.000	0.059	0.357	0.595	1.356	1.059	0.595	0.452	0.297	0.071	0.012	4.85
213.75 - 236.25	SW	0.000	0.107	0.262	0.559	2.212	1.641	0.690	0.345	0.119	0.012	0.012	5.96
236.25 - 258.75	WSW	0.000	0.083	0.250	0.535	2.129	1.689	0.678	0.155	0.155	0.000	0.012	5.69
258.75 - 281.25	W	0.012	0.107	0.297	0.595	1.475	1.368	0.821	0.404	0.678	0.369	0.131	6.26
281.25 - 303.75	WNW	0.000	0.107	0.381	0.571	1.487	0.963	0.714	0.607	1.261	0.404	0.107	6.60
303.75 - 326.25	NW	0.012	0.155	0.321	0.618	2.248	1.843	1.510	1.439	1.784	0.547	0.048	10.53
326.25 - 348.75	NNW	0.000	0.107	0.404	0.618	1.843	1.296	1.047	0.833	0.452	0.000	0.000	6.60

Total 100.00

MISSING HOURS: 352
 JOINT DATA RECOVERY: 96.0%

Salem and Hope Creek Ground Level Release

Dispersion (X/Q)

and

Deposition Factors (D/Q)

January – December 2019

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2019 SALEM GROUND LEVEL RELEASE DISPERSION (X/Q) AND DEPOSITION FACTORS (D/Q)

SPECIFIC POINTS OF INTEREST

Location	Direction From Site	Distance (MI)	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Depleted	D/Q (1/M ²)
SITE BOUNDARY	S	0.17	1.70E-05	1.70E-05	1.60E-05	6.90E-08
SITE BOUNDARY	SSW	0.13	2.80E-05	2.80E-05	2.70E-05	1.10E-07
SITE BOUNDARY	SW	0.11	3.20E-05	3.20E-05	3.10E-05	1.10E-07
SITE BOUNDARY	WSW	0.11	3.10E-05	3.10E-05	3.10E-05	8.70E-08
SITE BOUNDARY	W	0.12	2.50E-05	2.50E-05	2.40E-05	6.30E-08
SITE BOUNDARY	WNW	0.16	1.30E-05	1.30E-05	1.20E-05	4.30E-08
SITE BOUNDARY	NW	0.28	6.40E-06	6.40E-06	6.10E-06	4.40E-08
SITE BOUNDARY	NNW	0.68	1.20E-06	1.20E-06	1.00E-06	8.00E-09
SITE BOUNDARY	N	0.83	7.90E-07	7.90E-07	7.00E-07	4.90E-09
SITE BOUNDARY	NNE	0.89	6.50E-07	6.50E-07	5.70E-07	3.60E-09
SITE BOUNDARY	NE	1.07	6.80E-07	6.80E-07	5.90E-07	3.30E-09
SITE BOUNDARY	ENE	0.88	7.80E-07	7.80E-07	6.90E-07	4.40E-09
SITE BOUNDARY	E	0.89	7.50E-07	7.50E-07	6.60E-07	4.70E-09
SITE BOUNDARY	ESE	0.24	5.50E-06	5.50E-06	5.20E-06	4.00E-08
SITE BOUNDARY	SE	0.15	2.20E-05	2.20E-05	2.10E-05	1.30E-07
SITE BOUNDARY	SSE	0.15	1.80E-05	1.80E-05	1.70E-05	8.20E-08
NEAREST RES	S	5.22	9.00E-08	9.00E-08	6.70E-08	2.20E-10
NEAREST RES	SSW	3.85	1.30E-07	1.30E-07	1.00E-07	4.00E-10
NEAREST RES	SW	4.29	1.10E-07	1.10E-07	8.40E-08	3.00E-10
NEAREST RES	WSW	4.41	1.00E-07	1.00E-07	7.90E-08	2.20E-10
NEAREST RES	W	3.98	1.10E-07	1.10E-07	8.30E-08	2.10E-10
NEAREST RES	WNW	3.42	1.10E-07	1.10E-07	8.20E-08	2.70E-10
NEAREST RES	NW	3.67	1.40E-07	1.40E-07	1.10E-07	5.90E-10
NEAREST RES	NNW	4.23	8.80E-08	8.80E-08	6.70E-08	3.30E-10
NEAREST RES	N	5.65	5.50E-08	5.50E-08	4.00E-08	1.70E-10
NEAREST RES	NNE	4.97	6.00E-08	6.00E-08	4.40E-08	1.80E-10
NEAREST RES	NE	3.85	1.20E-07	1.20E-07	9.20E-08	3.50E-10
NEAREST RES	ENE	3.85	1.00E-07	1.00E-07	7.80E-08	3.30E-10
NEAREST RES	E	5.28	6.30E-08	6.30E-08	4.70E-08	2.10E-10
NEAREST RES	ESE	5.84	5.00E-08	5.00E-08	3.60E-08	1.80E-10
NEAREST RES	SE	9.44	4.30E-08	4.30E-08	2.90E-08	1.30E-10
NEAREST RES	SSE	9.44	3.50E-08	3.50E-08	2.40E-08	8.20E-11
GARDENS	NNW	0.57	1.50E-06	1.50E-06	1.40E-06	1.10E-08
GARDENS	SE	0.18	1.60E-05	1.60E-05	1.50E-05	9.90E-08
GARDENS	N	0.57	1.40E-06	1.40E-06	1.30E-06	9.20E-09
GARDENS	NW	0.58	1.90E-06	1.90E-06	1.80E-06	1.40E-08
GARDENS	SSW	3.9	1.30E-07	1.30E-07	1.00E-07	3.90E-10
GARDENS	NE	4.9	8.60E-08	8.60E-08	6.40E-08	2.30E-10
GARDENS	ENE	5	7.00E-08	7.00E-08	5.30E-08	2.10E-10
GARDENS	NE	5	8.40E-08	8.40E-08	6.20E-08	2.20E-10
GARDENS	E	6	5.30E-08	5.30E-08	3.80E-08	1.70E-10
GARDENS	ENE	6	5.50E-08	5.50E-08	4.00E-08	1.50E-10
GARDENS	ESE	6.3	4.50E-08	4.50E-08	3.20E-08	1.60E-10
GARDENS	NW	7	6.00E-08	6.00E-08	4.30E-08	1.80E-10
GARDENS	NNE	7.5	3.40E-08	3.40E-08	2.40E-08	8.70E-11
GARDENS	NW	8.3	4.80E-08	4.80E-08	3.30E-08	1.40E-10
GARDENS	NE	9.3	3.60E-08	3.60E-08	2.50E-08	7.60E-11

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Location	Direction From Site	Distance (MI)	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Depleted	D/Q (1/M ²)
GARDENS	N	10.9	2.30E-08	2.30E-08	1.50E-08	5.70E-11
GARDENS	NNE	13.2	1.60E-08	1.60E-08	1.00E-08	3.40E-11
GARDENS	WNW	12.1	2.00E-08	2.00E-08	1.30E-08	3.00E-11
GARDENS	NE	23.3	1.10E-08	1.10E-08	6.10E-09	1.60E-11
GARDENS	SW	4.6	1.00E-07	1.00E-07	7.60E-08	2.70E-10
DAIRY & CATTL	W	4.9	8.20E-08	8.20E-08	6.10E-08	1.50E-10
DAIRY & CATTL	WNW	8.5	3.20E-08	3.20E-08	2.20E-08	5.40E-11
DAIRY & CATTL	NE	11.3	2.80E-08	2.80E-08	1.90E-08	5.50E-11
DAIRY & CATTL	N	11.7	2.10E-08	2.10E-08	1.30E-08	5.10E-11
DAIRY & CATTL	NNE	11.8	1.80E-08	1.80E-08	1.20E-08	4.20E-11
DAIRY & CATTL	NE	4.2	1.10E-07	1.10E-07	8.10E-08	3.00E-10
DAIRY & CATTL	NE	5.8	6.90E-08	6.90E-08	5.00E-08	1.70E-10
DAIRY & CATTL	SSW	8.3	4.80E-08	4.80E-08	3.30E-08	1.00E-10
DAIRY & CATTL	N	11.5	2.10E-08	2.10E-08	1.40E-08	5.20E-11
DAIRY & CATTL	NE	17.7	1.60E-08	1.60E-08	9.40E-09	2.50E-11

VENT AND BUILDING PARAMETERS:			
Release Height (Meters)	0.00	Rep. Wind Height (Meters)	10.00
Diameters (Meters)	0.00	Building Height (Meters)	61.00
Exit Velocity (Meters)	0.00	BLDG.MIN.CRS. SEC.AREA (Square Meters)	3720.00
		Heat Emission Rate (Cal/Sec)	0.00

2019 HOPE CREEK GROUND LEVEL RELEASE DISPERSION (X/Q) AND DEPOSITION FACTORS (D/Q)

SPECIFIC POINTS OF INTEREST

LOCATION	DIRECTION FROM SITE	Distance (MI)	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Depleted	D/Q (1/M ²)
SITE BOUNDARY	S	0.25	8.00E-06	8.00E-06	7.60E-06	3.70E-08
SITE BOUNDARY	SSW	0.19	1.30E-05	1.30E-05	1.30E-05	5.90E-08
SITE BOUNDARY	SW	0.17	1.50E-05	1.50E-05	1.50E-05	6.40E-08
SITE BOUNDARY	WSW	0.17	1.50E-05	1.50E-05	1.50E-05	4.90E-08
SITE BOUNDARY	W	0.18	1.20E-05	1.20E-05	1.20E-05	3.60E-08
SITE BOUNDARY	WNW	0.22	7.10E-06	7.10E-06	6.70E-06	2.70E-08
SITE BOUNDARY	NW	0.31	5.60E-06	5.60E-06	5.20E-06	3.90E-08
SITE BOUNDARY	NNW	0.55	1.60E-06	1.60E-06	1.40E-06	1.10E-08
SITE BOUNDARY	N	0.5	1.70E-06	1.70E-06	1.60E-06	1.10E-08
SITE BOUNDARY	NNE	0.63	1.10E-06	1.10E-06	9.60E-07	6.50E-09
SITE BOUNDARY	NE	0.74	1.10E-06	1.10E-06	1.00E-06	6.10E-09
SITE BOUNDARY	ENE	0.94	7.00E-07	7.00E-07	6.20E-07	3.90E-09
SITE BOUNDARY	E	0.94	6.90E-07	6.90E-07	6.10E-07	4.30E-09
SITE BOUNDARY	ESE	0.75	8.90E-07	8.90E-07	7.90E-07	6.70E-09
SITE BOUNDARY	SE	0.47	2.90E-06	2.90E-06	2.60E-06	2.30E-08
SITE BOUNDARY	SSE	0.42	2.80E-06	2.80E-06	2.60E-06	1.70E-08
NEAREST RES	S	5.22	9.00E-08	9.00E-08	6.70E-08	2.20E-10
NEAREST RES	SSW	3.85	1.30E-07	1.30E-07	1.00E-07	4.00E-10
NEAREST RES	SW	4.29	1.10E-07	1.10E-07	8.40E-08	3.00E-10
NEAREST RES	WSW	4.41	1.00E-07	1.00E-07	7.80E-08	2.20E-10
NEAREST RES	W	3.98	1.10E-07	1.10E-07	8.30E-08	2.10E-10
NEAREST RES	WNW	3.42	1.10E-07	1.10E-07	8.20E-08	2.70E-10
NEAREST RES	NW	3.67	1.40E-07	1.40E-07	1.10E-07	5.90E-10
NEAREST RES	NNW	4.23	8.80E-08	8.80E-08	6.70E-08	3.30E-10
NEAREST RES	N	5.65	5.50E-08	5.50E-08	4.00E-08	1.70E-10
NEAREST RES	NNE	4.97	5.90E-08	5.90E-08	4.40E-08	1.80E-10
NEAREST RES	NE	3.85	1.20E-07	1.20E-07	9.20E-08	3.50E-10
NEAREST RES	ENE	3.85	1.00E-07	1.00E-07	7.80E-08	3.30E-10
NEAREST RES	E	5.28	6.30E-08	6.30E-08	4.70E-08	2.10E-10
NEAREST RES	ESE	5.84	5.00E-08	5.00E-08	3.60E-08	1.80E-10
NEAREST RES	SE	9.44	4.30E-08	4.30E-08	2.90E-08	1.30E-10
NEAREST RES	SSE	9.44	3.50E-08	3.50E-08	2.40E-08	8.20E-11
GARDENS	NNW	0.57	1.50E-06	1.50E-06	1.40E-06	1.10E-08
GARDENS	SE	0.18	1.60E-05	1.60E-05	1.50E-05	9.90E-08
GARDENS	N	0.57	1.40E-06	1.40E-06	1.30E-06	9.20E-09
GARDENS	NW	0.58	1.90E-06	1.90E-06	1.70E-06	1.40E-08
GARDENS	SSW	3.9	1.30E-07	1.30E-07	1.00E-07	3.90E-10
GARDENS	NE	4.9	8.60E-08	8.60E-08	6.40E-08	2.30E-10
GARDENS	ENE	5	7.00E-08	7.00E-08	5.20E-08	2.10E-10
GARDENS	NE	5	8.40E-08	8.40E-08	6.20E-08	2.20E-10
GARDENS	E	6	5.30E-08	5.30E-08	3.80E-08	1.70E-10
GARDENS	ENE	6	5.50E-08	5.50E-08	4.00E-08	1.50E-10
GARDENS	ESE	6.3	4.50E-08	4.50E-08	3.20E-08	1.60E-10
GARDENS	NW	7	6.00E-08	6.00E-08	4.30E-08	1.80E-10
GARDENS	NNE	7.5	3.40E-08	3.40E-08	2.40E-08	8.70E-11
GARDENS	NW	8.3	4.80E-08	4.80E-08	3.30E-08	1.40E-10
GARDENS	NE	9.3	3.60E-08	3.60E-08	2.50E-08	7.60E-11

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

LOCATION	DIRECTION FROM SITE	Distance (MI)	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Undepleted	X/Q (Sec/M ³) No Decay Depleted	D/Q (1/M ²)
GARDENS	N	10.9	2.30E-08	2.30E-08	1.50E-08	5.70E-11
GARDENS	NNE	13.2	1.60E-08	1.60E-08	1.00E-08	3.40E-11
GARDENS	WNW	12.1	2.00E-08	2.00E-08	1.30E-08	3.00E-11
GARDENS	NE	23.3	1.10E-08	1.10E-08	6.10E-09	1.60E-11
GARDENS	SW	4.6	1.00E-07	1.00E-07	7.50E-08	2.70E-10
DAIRY & CATTL	W	4.9	8.10E-08	8.10E-08	6.10E-08	1.50E-10
DAIRY & CATTL	WNW	8.5	3.20E-08	3.20E-08	2.20E-08	5.40E-11
DAIRY & CATTL	NE	11.3	2.80E-08	2.80E-08	1.80E-08	5.50E-11
DAIRY & CATTL	N	11.7	2.10E-08	2.10E-08	1.30E-08	5.10E-11
DAIRY & CATTL	NNE	11.8	1.80E-08	1.80E-08	1.20E-08	4.20E-11
DAIRY & CATTL	NE	4.2	1.10E-07	1.10E-07	8.10E-08	3.00E-10
DAIRY & CATTL	NE	5.8	6.80E-08	6.80E-08	5.00E-08	1.70E-10
DAIRY & CATTL	SSW	8.3	4.80E-08	4.80E-08	3.30E-08	1.00E-10
DAIRY & CATTL	N	11.5	2.10E-08	2.10E-08	1.40E-08	5.20E-11
DAIRY & CATTL	NE	17.7	1.60E-08	1.60E-08	9.30E-09	2.50E-11

VENT AND BUILDING PARAMETERS:			
Release Height (Meters)	0.00	Rep. Wind Height (Meters)	10.0
Diameters (Meters)	0.00	Building Height (Meters)	61.8
Exit Velocity (Meters)	0.00	BLDG.MIN.CRS.SEC.AR EA (Square Meters)	3819.0
		Heat Emission Rate (Cal/Sec)	0.0

APPENDIX C

Maximum Permissible Concentration (MPC) Data

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2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

The following radionuclide concentrations were obtained from 10 CFR 20 Appendix B, Table II, Column 2 as revised January 1, 1991.

Maximum Permissible Concentrations			
Element	Isotope	Soluble Conc. ($\mu\text{Ci/ml}$)	Insoluble Conc. ($\mu\text{Ci/ml}$)
Actinium (89)	Ac-227	2E-6	3E-4
	Ac-228	9E-5	9E-5
Americium (95)	Am-241	4E-6	3E-5
	Am-242m	4E-6	9E-5
	Am-242	1E-4	1E-4
	Am-243	4E-6	3E-5
Antimony (51)	Am-244	5E-3	5E-3
	Sb-122	3E-5	3E-5
	Sb-124	2E-5	2E-5
Arsenic (33)	Sb-125	1E-4	1E-4
	Sb-126	3E-6	3E-6
	As-73	5E-4	5E-4
	As-74	5E-5	5E-5
Astatine (85)	As-76	2E-5	2E-5
	As-77	8E-5	8E-5
	At-211	2E-6	7E-5
Barium (56)	Ba-131	2E-4	2E-4
	Ba-140	3E-5	2E-5
Berkelium (97)	Bk-249	6E-4	6E-4
	Bk-250	2E-4	2E-4
Beryllium (4)	Be-7	2E-3	2E-3
Bismuth (83)	Bi-206	4E-5	4E-5
	Bi-207	6E-5	6E-5
	Bi-210	4E-5	4E-5
	Bi-212	4E-4	4E-4
Bromine (35)	Br-82	3E-4	4E-5
	Br-83	3E-6	3E-6
Cadmium (48)	Cd-109	2E-4	2E-4
	Cd-115m	3E-5	3E-5
	Cd-115	3E-5	4E-5
Calcium (20)	Ca-45	9E-6	2E-4
	Ca-47	5E-5	3E-5
Californium (98)	Cf-249	4E-6	2E-5
	Cf-250	1E-5	3E-5
	Cf-251	4E-6	3E-5
	Cf-252	7E-6	7E-6
	Cf-253	1E-4	1E-4
Carbon (6)	Cf-254	1E-7	1E-7
	C-14	8E-4	-----
	Cerium (58)	Ce-141	9E-5
Ce-143		4E-5	4E-5
Ce-144		1E-5	1E-5
Cesium (55)	Cs-131	2E-3	9E-4
	Cs-134m	6E-3	1E-3
	Cs-134	9E-6	4E-5

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Maximum Permissible Concentrations			
Element	Isotope	Soluble Conc. ($\mu\text{Ci/ml}$)	Insoluble Conc. ($\mu\text{Ci/ml}$)
	Cs-135	1E-4	2E-4
	Cs-136	9E-5	6E-5
	Cs-137	2E-5	4E-5
Chlorine (17)	Cl-36	8E-5	6E-5
	Cl-38	4E-4	4E-4
Chromium (24)	Cr-51	2E-3	2E-3
Cobalt (27)	Co-57	5E-4	4E-4
	Co-58m	3E-3	2E-3
	Co-58	1E-4	9E-5
	Co-60	5E-5	3E-5
Copper (29)	Cu-64	3E-4	2E-4
Curium (96)	Cm-242	2E-5	2E-5
	Cm-243	5E-6	2E-5
	Cm-244	7E-6	3E-5
	Cm-245	4E-6	3E-5
	Cm-246	4E-6	3E-5
	Cm-247	4E-6	2E-5
	Cm-248	4E-7	1E-6
	Cm-249	2E-3	2E-3
Dysprosium (66)	Dy-165	4E-4	4E-4
	Dy-166	4E-5	4E-5
Einsteinium (99)	Es-253	2E-5	2E-5
	Es-254m	2E-5	2E-5
	Es-254	1E-5	1E-5
	Es-255	3E-5	3E-5
Erbium (68)	Er-169	9E-5	9E-5
	Er-171	1E-4	1E-4
Europium (63)	Eu-152 (9.2 hrs)	6E-5	6E-5
	Eu-152 (13 yrs)	8E-5	8E-5
	Eu-154	2E-5	2E-5
	Eu-155	2E-4	2E-4
Fermium (100)	Fm-254	1E-4	1E-4
	Fm-255	3E-5	3E-5
	Fm-256	9E-7	9E-7
Fluorine (9)	F-18	8E-4	5E-4
Gadolinium (64)	Gd-153	2E-4	2E-4
	Gd-159	8E-5	8E-5
Gallium (31)	Ga-72	4E-5	4E-5
Germanium (32)	Ge-71	2E-3	2E-3
Gold (79)	Au-196	2E-4	1E-4
	Au-198	5E-5	5E-5
	Au-199	2E-4	2E-4
Hafnium (72)	Hf-181	7E-5	7E-5
Holmium (67)	Ho-166	3E-5	3E-5
Hydrogen (3)	H-3	3E-3	3E-3
Indium (49)	In-113m	1E-3	1E-3
	In-114m	2E-5	2E-5
	In-115m	4E-4	4E-4

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Maximum Permissible Concentrations			
Element	Isotope	Soluble Conc. ($\mu\text{Ci/ml}$)	Insoluble Conc. ($\mu\text{Ci/ml}$)
	In-115	9E-5	9E-5
Iodine (53)	I-125	2E-7	2E-4
	I-126	3E-7	9E-5
	I-129	6E-8	2E-4
	I-130	3E-6	3E-6
	I-131	3E-7	6E-5
	I-132	8E-6	2E-4
	I-133	1E-6	4E-5
	I-134	2E-5	6E-4
	I-135	4E-6	7E-5
Iridium (77)	Ir-190	2E-4	2E-4
	Ir-192	4E-5	4E-5
	Ir-194	3E-5	3E-5
Iron (26)	Fe-55	8E-4	2E-3
	Fe-59	6E-5	5E-5
Lanthanum (57)	La-140	2E-5	2E-5
Lead (82)	Pb-203	4E-4	4E-4
	Pb-210	1E-7	2E-4
	Pb-212	2E-5	2E-5
Lutetium (71)	Lu-177	1E-4	1E-4
Manganese (25)	Mn-52	3E-5	3E-5
	Mn-54	1E-4	1E-4
	Mn-56	1E-4	1E-4
Mercury (80)	Hg-197m	2E-4	2E-4
	Hg-197	3E-4	5E-4
	Hg-203	2E-5	1E-4
Molybdenum (42)	Mo-99	2E-4	4E-5
Neodymium (60)	Nd-144	7E-5	8E-5
	Nd-147	6E-5	6E-5
	Nd-149	3E-4	3E-4
Neptunium (93)	Np-237	3E-6	3E-5
	Np-239	1E-4	1E-4
Nickel (28)	Ni-59	2E-4	2E-3
	Ni-63	3E-5	7E-4
	Ni-65	1E-4	1E-4
Niobium (41)	Nb-93m	4E-4	4E-4
	Nb-95	1E-4	1E-4
	Nb-97	9E-4	9E-4
Osmium (76)	Os-185	7E-5	7E-5
	Os-191m	3E-3	2E-3
	Os-191	2E-4	2E-4
	Os-193	6E-5	5E-5
Palladium (46)	Pd-103	3E-4	3E-4
	Pd-109	9E-5	7E-5
Phosphorus (15)	P-32	2E-5	2E-5
Platinum (78)	Pt-191	1E-4	1E-4
	Pt-193m	1E-3	1E-3

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Maximum Permissible Concentrations			
Element	Isotope	Soluble Conc. ($\mu\text{Ci/ml}$)	Insoluble Conc. ($\mu\text{Ci/ml}$)
	Pt-193	9E-4	2E-3
	Pt-197m	1E-3	9E-4
	Pt-197	1E-4	1E-4
Plutonium (94)	Pu-238	5E-6	3E-5
	Pu-239	5E-6	3E-5
	Pu-240	5E-6	3E-5
	Pu-241	2E-4	1E-3
	Pu-242	5E-6	3E-5
	Pu-243	3E-4	3E-4
Polonium (84)	Po-210	7E-7	3E-5
Potassium (19)	K-42	3E-4	2E-5
Praseodymium(59)	Pr-142	3E-5	3E-5
	Pr-143	5E-5	5E-5
Promethium (61)	Pm-147	2E-4	2E-4
	Pm-149	4E-5	4E-5
Protactinium(91)	Pa-230	2E-4	2E-4
	Pa-231	9E-7	2E-5
	Pa-233	1E-4	1E-4
Radium (88)	Ra-223	7E-7	4E-6
	Ra-224	2E-6	5E-6
	Ra-226	3E-8	3E-5
	Ra-228	3E-8	3E-5
Rhenium (75)	Re-183	6E-4	3E-4
	Re-186	9E-5	5E-5
	Re-187	3E-3	2E-3
	Re-188	6E-5	3E-5
Rhodium (45)	Rh-103m	1E-2	1E-2
	Rh-105	1E-4	1E-4
Rubidium (37)	Rb-86	7E-5	2E-5
	Rb-87	1E-4	2E-4
Ruthenium (44)	Ru-97	4E-4	3E-4
	Ru-103	8E-5	8E-5
	Ru-103m	3E-6	3E-6
	Ru-105	1E-4	1E-4
	Ru-106	1E-5	1E-5
Samarium (62)	Sm-147	6E-5	7E-5
	Sm-151	4E-4	4E-4
	Sm-153	8E-5	8E-5
Scandium (21)	Sc-46	4E-5	4E-5
	Sc-47	9E-5	9E-5
	Sc-48	3E-5	3E-5
Selenium (34)	Se-75	3E-4	3E-4
Silicon (14)	Si-31	9E-4	2E-4
Silver (47)	Ag-105	1E-4	1E-4
	Ag-110m	3E-5	3E-5
	Ag-111	4E-5	4E-5
Sodium (11)	Na-22	4E-5	3E-5
	Na-24	2E-4	3E-5

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Maximum Permissible Concentrations			
Element	Isotope	Soluble Conc. ($\mu\text{Ci/ml}$)	Insoluble Conc. ($\mu\text{Ci/ml}$)
Strontium (38)	Sr-85m	7E-3	7E-3
	Sr-85	1E-4	2E-4
	Sr-89	3E-6	3E-5
	Sr-90	3E-7	4E-5
	Sr-91	7E-5	5E-5
	Sr-92	7E-5	6E-5
Sulfur (16)	S-35	6E-5	3E-4
Tantalum (73)	Ta-182	4E-5	4E-5
Technetium (43)	Tc-96m	1E-2	1E-2
	Tc-96	1E-4	5E-5
	Tc-97m	4E-4	2E-4
	Tc-97	2E-3	8E-4
	Tc-99m	6E-3	3E-3
	Tc-99	3E-4	2E-4
Tellurium (52)	Te-125m	2E-4	1E-4
	Te-127m	6E-5	5E-5
	Te-127	3E-4	2E-4
	Te-129m	3E-5	2E-5
	Te-129	8E-4	8E-4
	Te-131m	6E-5	4E-5
	Te-132	3E-5	2E-5
Terbium (65)	Tb-160	4E-5	4E-5
Thallium (81)	Tl-200	4E-4	2E-4
	Tl-201	3E-4	2E-4
	Tl-202	1E-4	7E-5
	Tl-204	1E-4	6E-5
Thorium (90)	Th-227	2E-5	2E-5
	Th-228	7E-6	1E-5
	Th-230	2E-6	3E-5
	Th-231	2E-4	2E-4
	Th-232	2E-6	4E-5
	Th-natural	2E-6	2E-5
	Th-234	2E-5	2E-5
Thulium (69)	Tm-170	5E-5	5E-5
	Tm-171	5E-4	5E-4
Tin (50)	Sn-113	9E-5	8E-5
	Sn-124	2E-5	2E-5
Tungsten (74)	W-181	4E-4	3E-4
	W-185	1E-4	1E-4
	W-187	7E-5	6E-5
Uranium (92)	U-230	5E-6	5E-6
	U-232	3E-5	3E-5
	U-233	3E-5	3E-5
	U-234	3E-5	3E-5
	U-235	3E-5	3E-5
	U-236	3E-5	3E-5
	U-238	4E-5	4E-5
	U-240	3E-5	3E-5

Maximum Permissible Concentrations			
Element	Isotope	Soluble Conc. ($\mu\text{Ci/ml}$)	Insoluble Conc. ($\mu\text{Ci/ml}$)
	U-natural	3E-5	3E-5
Vanadium (23)	V-48	3E-5	3E-5
Ytterbium (70)	Yb-175	1E-4	1E-4
Yttrium	Y-90	2E-5	2E-5
	Y-91m	3E-3	3E-3
	Y-91	3E-5	3E-5
	Y-92	6E-5	6E-5
	Y-93	3E-5	3E-5
Zinc (30)	Zn-65	1E-4	2E-4
	Zn-69m	7E-5	6E-5
	Zn-69	2E-3	2E-3
Zirconium (40)	Zr-93	8E-4	8E-4
	Zr-95	6E-5	6E-5
	Zr-97	2E-5	2E-5
Any single radionuclide not listed above with decay mode other than alpha emission or spontaneous fission and with radioactive half-life greater than 2 hours		3E-6	3E-6
Any single radionuclide not listed above, which decays by alpha emission or spontaneous fission.		3E-8	3E-8

Notes:

1. If the identity of any radionuclide is not known, the limiting values for purposes of this table shall be: 3E-8 $\mu\text{Ci/ml}$.
2. If the identity and concentration of each radionuclide were known, the limiting values should be derived as follows: Determine, for each radionuclide in the mixture, the ratio between the quantity present in the mixture and the limit otherwise established in Appendix B for the specific radionuclide not in a mixture. The sum of such ratios for all the radionuclides in the mixture may not exceed "1" (i.e. "unity").

APPENDIX D

2019 Radiological Groundwater Protection Program (RGPP) Report

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2019 Radiological Groundwater Protection Program (RGPP) Report

Results of the Integrated Tritium Management Program

With

2019 Radiological Groundwater Protection Program (RGPP)

And

2019 Monitoring Well and Remedial Action Work Plan

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Introduction

This report presents results of the 2019 groundwater monitoring activities performed by PSEG Nuclear at both the Hope Creek Generating Station (HCGS) and Salem Generating Station (SGS); collectively referred to as “the Station”. Well locations at the Station are shown on Figures 1 and 2, respectively. To link the various groundwater monitoring programs at the Station, PSEG implemented the Integrated Tritium Management Program (ITMP) which integrates the following four broad programs:

- The Radiological Groundwater Protection Program (RGPP) is a program that was developed to ensure the timely detection of an unpermitted release of radioactive material;
- The Remedial Action Work Plan (RAWP) is a program that monitors the remediation of the historical release from the SGS Unit 1 Spent Fuel Pool;
- Investigation wells were installed as part of independent investigations into groundwater quality, that are not included as part of the RGPP or RAWP; and
- Early Site Permit (ESP) wells which are periphery wells that were installed outside of the protected area to support the potential licensing of a new nuclear plant.

Well construction details for the Station’s RGPP wells are presented on Tables 1 and 2, respectively. Well construction details for the wells that are not specifically part of the RGPP are presented on Table 3.

PSEG initiated the RGPP in 2006 to characterize groundwater at, and in the vicinity of, the Station with respect to historical releases of radionuclides and to provide the mechanism to detect such releases, if one were to occur. The RGPP is a voluntary program implemented by PSEG in conjunction with the nuclear industry initiatives and associated guidance (NEI 2007). The other key elements that comprise the RGPP and contribute to public safety are spill/leak prevention, effective remediation of spills and leaks, and effective stakeholder communication.

In 2002, PSEG operations personnel at SGS identified a release of tritiated water from the SGS Unit 1 Spent Fuel Pool to the environment. PSEG developed a RAWP to remediate the tritium in groundwater, which was reviewed by the United States Nuclear Regulatory Commission (USNRC) and approved by the New Jersey Department of Environmental Protection (NJDEP) Bureau of Nuclear Engineering (BNE). A Groundwater Recovery System (GRS) was installed to control the migration of groundwater in the shallow, water-bearing unit and to reduce the remaining mass of tritiated groundwater. The operation and performance of the GRS is documented in the Remedial Action Progress Reports (RAPRs) provided to the NRC and NJDEP-BNE by PSEG. PSEG generates an effluent release permit for the residual tritium in groundwater discharging to the Delaware River. The permit values are included in the liquid effluent data reported earlier in this document.

The Station is located in a flat, largely undeveloped region of southern New Jersey, which is bordered to the west and south by the Delaware River and to the east and north by extensive marshlands. The Station obtains cooling water from the Delaware River.

The Station is underlain by over 1,000 feet of inter-layered sand, silt and clay. PSEG owns seven production/potable wells, which range in depth from 270 feet below ground surface (bgs) to 1135 feet bgs. These wells are installed in deeper formations isolated by confining units beneath the Vincentown Formation.

The results from a computer based well search identified the nearest off-site permitted potable well is located approximately 3.5 miles away. Shallow groundwater and the Vincentown aquifer (the two most shallow water bearing units underlying the Station) flow toward and discharge to the Delaware River, thus reducing the potential that Station operations have or will influence off-site potable wells.

I. Radiological Groundwater Protection Program

This section of the annual report is prepared to summarize the status, activities, and groundwater analytical results collected in 2019 at the Site. This report also describes any changes made to the monitoring program during the 2019 reporting year.

4. Objectives of the Radiological Groundwater Protection Program

The long-term sampling program objectives are as follows:

- Identify suitable locations to monitor and evaluate potential impacts from Station operations before significant radiological impact to the environment or potential drinking water sources can occur.
- Refine the conceptual understanding of local hydrogeology and maintain current knowledge of potential flow paths on the surface and in groundwater beneath the Station.
- Evaluate systems, structures, components (SSCs) and work practices, which have the potential to release licensed radioactive material to the groundwater and develop strategies to mitigate potential releases to the environment.
- Perform routine groundwater monitoring and evaluate analytical results.
- Report any leaks, spills, or other detections with potential radiological significance to stakeholders in a timely manner.
- Take necessary corrective actions to protect groundwater resources.

5. Sample Collection

In 2006, the RGPP monitoring wells (Tables 1 and 2) were installed at the Station as part of site investigation activities. Details pertaining to these activities are documented in the Site Investigation Reports (Arcadis 2006A and 2006B). Groundwater samples are collected from all RGPP monitoring wells at least semi-annually, with additional monitoring conducted as appropriate. The groundwater sample collection schedule is adaptively managed to ensure that representative data are collected to provide the information necessary to evaluate groundwater quality conditions. Monitoring wells are sampled following the low-flow purging and sampling techniques in accordance with the Field Sampling Procedures Manual (NJDEP 2005). This methodology is consistent with protocols established in the RAWP.

6. New RGPP Wells

No new wells were added as part of the RGPP during 2019.

7. Sample Analysis

Groundwater samples collected from RGPP wells are analyzed for plant-related gamma emitting radionuclides (semi-annually), strontium (annually), iron 55 (biennially) and tritium (every sample) by an off-site radiochemical analytical laboratory.

The samples are maintained under chain of custody procedures throughout sample handling, screening, shipping and laboratory analysis process. Samples are submitted to the respective

Station's on-site chemistry laboratory for radiological analysis screening prior to shipment to Teledyne Brown Engineering (TBE) located in Knoxville, Tennessee, for radiological analysis. Analytical laboratories are subject to internal quality assurance programs and inter-laboratory cross-check programs. Station personnel review and evaluate analytical data obtained from the laboratory.

8. Data Evaluation

Analytical results are reviewed for adverse trends or anomalies. Investigations and corrective action program notifications (Notification) are made as required by program procedures. The radiological data collected since the inception of the RGPP program is the basis for the baseline statistical evaluation to which current operational data are compared. Several factors are important in the interpretation and evaluation of the radiological data:

A. Detection limits

The Offsite Dose Calculation Manual (ODCM) specifies detection capabilities for each isotope that may be produced by the Station. While the detection capability for tritium specified in the ODCM is 3,000 picocuries per liter (pCi/L) in water, RGPP tritium analyses are performed to a lower value of 200 pCi/L. Lower values for LLDs are used to be consistent with the State of New Jersey where PSEG conducts split samples with the NJDEP-BNE for specific wells. Each well has a statistically derived action level. When an action level is exceeded, PSEG may increase monitoring frequency and evaluates potential sources of the elevated tritium. Relevant groundwater evaluation criteria are listed in Table 4.

B. Laboratory Measurements Uncertainty

Statistically, the value of a measurement is expressed as a range with a stated level of confidence. PSEG is required to report results with a 95% level of confidence.

Analytical uncertainties are reported at the 95% confidence level in this report and are consistent with the methodologies used to report data in the Annual Radiological Environmental Operating Report.

9. RGPP Data Quality

Groundwater samples consist of up to four aliquots. One of the aliquots is submitted to the respective Site's on-site chemistry laboratory for initial screening, which includes tritium and gamma spectroscopy analysis. The second aliquot is sent to TBE for tritium analysis. In accordance with NJDEP request, the third aliquot is collected from specific wells and submitted for split sample analysis to GEL Laboratories located in Charleston, South Carolina. The fourth aliquot is held as a back-up, "retained" sample until all the analytical results are received and determined to be valid.

All radionuclide results are compared to the following limitations defined as part of the RGPP:

- Internal Administrative Control Limits are defined within the RGPP procedures. They are developed based on a statistical analysis of the historical baseline concentrations of tritium in each specific well and are used to identify tritium concentrations that warrant further investigation for that specific well. Solely exceeding an Administrative Control Limit does not initiate external communication, unless the external reporting limit is also exceeded.

- The Courtesy Communication Limit is a tritium concentration, below regulatory requirements, based on agreements with NJDEP-BNE, USNRC and other stakeholders ensuring the stakeholders are cognizant of potential issues. If a confirmed tritium result, collected from a RGPP well, exceeds the Courtesy Communication Limit of 3,000 pCi/L, PSEG provides a courtesy communication by telephone no later than the end of the next business day to NJDEP-BNE. The NRC Site Resident is also informed. This is not a regulatory required communication.
- Voluntary Communication Limits are those concentrations of radionuclides that require voluntary communication and reporting to regulators and/or stakeholders based on NEI 07-07, the ODCMs, and Site procedures.

II. Discussion

The locations of the RGPP monitoring wells located at HCGS and SGS are depicted on Figures 1 and 2, respectively. Additionally, well construction details for the HCGS RGPP wells and SGS RGPP wells are presented on Tables 1 and 2, respectively. The relevant radiological parameters used to evaluate the groundwater analytical results are provided in Table 4. The groundwater tritium analytical results for HCGS and SGS are shown on Tables 5 and 6, respectively.

1. Groundwater Results - RGPP

Groundwater samples were collected from all RGPP monitoring wells during 2019 in accordance with the Station and PSEG's Laboratory and Testing Services (LTS) procedures for the RGPP. Sample results are discussed below.

A. HCGS RGPP Wells

Tritium analytical results for groundwater samples collected during 2019 from HCGS RGPP monitoring wells are summarized below and are presented in Table 5.

- Tritium was not detected in groundwater samples collected from 8 of the 13 HCGS RGPP wells (wells BH, BK, BL, BP, BQ, BR, BS, and BT).
- Well BI: Tritium concentrations detected in well BI ranged from 254 pCi/L (November 2019) to 1,350 pCi/L (May 2019) and averaged 692 pCi/L, during 2019. Well BI is located west of the reactor containment and is a sentinel (source) well for facilities and buried piping.
- Well BJ: Tritium concentrations detected in well BJ ranged from 2,770 pCi/L (June 2019) to 5,140 pCi/L (December 2019) and averaged 3,411 pCi/L, during 2019. Well BJ is located near the HCGS main permitted gaseous effluent vent (i.e., south plant vent).
- Well BM: Tritium was detected at concentrations ranging from 420 pCi/L (February 2019) to 529 pCi/L (August 2019) and averaged 477 pCi/L, during 2019. Well BM is located northwest of the reactor containment and is a sentinel (source) well for facilities and buried piping.
- Well BN: Tritium concentrations detected in well BN ranged from 393 pCi/L (October 2019) to 2,270 pCi/L (February 2019) and averaged 1,003 pCi/L. Well BN is located northeast of the Materials Control Center and is a sentinel (source) well for the Auxiliary Boiler building and buried piping.

- Well BO: Tritium concentrations detected in well BO ranged from 437 pCi/L (November 2019) to 1,290 pCi/L (May 2019). Tritium was not detected in the sample collected in August 2019. Well BO is located northeast of the Materials Control Center and is a sentinel (source) well for the Auxiliary Boiler building and buried piping.
- There were no analytical results for which a Courtesy Communication (greater than 3,000 pCi/L tritium) was required as part of the HCGS RGPP.

With the exception of tritium, no plant-related radionuclides were detected in any HCGS RGPP well sampled in 2019.

B. SGS RGPP Wells

Tritium analytical results for groundwater samples collected during 2019 from SGS RGPP monitoring wells are summarized below and are presented on Table 6.

- Tritium was not detected in groundwater samples collected from 6 of the 13 SGS RGPP wells (wells BA, BB, BF, BU, T, and Y).
- Well AL: Well AL was sampled in May and November 2019, with results of 398 pCi/L and 697 pCi/L respectively. Well AL is located south of the SGS Unit 1 reactor building and is a sentinel (source) well.
- Well BC: Tritium was detected at concentrations ranging from 1,270 pCi/L (February 2019) to 4,780 pCi/L (December 2019) and averaged 2,743 pCi/L. Well BC is a sentinel (source)/perimeter well located southwest of Facilities, Refueling Water Storage Tank, Auxiliary Feedwater Storage Tank and Primary Water Storage Tank (RAP) tanks and piping.
- Well BD: Tritium was detected at concentrations ranging from 384 pCi/L (February 2019) to 592 pCi/L (August 2019) and averaged 465 pCi/L. Well BD is located to the west of SGS Unit 2 reactor building and is a sentinel (source) well for Facilities, RAP tanks, and piping.
- Well BE: Tritium was detected at concentrations ranging from 291 pCi/L (February 2019) to 755 pCi/L (May 2019) and averaged 532 pCi/L. Well BE is located to the west of SGS Unit 2 reactor building and is a perimeter well.
- Well BG: Tritium was detected at concentrations ranging from 191 pCi/L (May 2019) to 254 pCi/L (August 2019) and averaged 219 pCi/L. Well BG is located northwest of SGS Unit 2 reactor building and is a perimeter well.
- Well U: Tritium was detected at concentrations ranging from 227 pCi/L (August 2019) to 497 pCi/L (February 2019) and averaged 362 pCi/L. Well U is located north of SGS Unit 2 reactor building and is a sentinel (source) well for the House Heating Boilers.
- Well Z: Tritium was detected in the samples collected in May 2019 (514 pCi/L) and November 2019 at concentrations of 514 pCi/L and 545 pCi/L, respectively. Well Z is located west of the SGS Unit 1 & 2 reactor buildings and is a perimeter well.
- There were no analytical results for which a Courtesy Communication (greater than 3,000 pCi/L tritium) was required as part of the SGS RGPP.

With the exception of tritium, no plant-related radionuclides were detected in any SGS RGPP well sampled in 2019.

2. Mass Flux Estimation of Tritium to the Delaware River

PSEG uses transect methods to calculate the mass flux of tritium to the Delaware River in the shallow, water bearing unit and the deeper basal sand unit and Vincentown Formation. To calculate the mass flux, the tritium concentration was conservatively estimated using the average concentration detected in monitoring wells located nearest to the Delaware River during each quarter. During 2019, the mass flux within the shallow, water bearing unit and deeper groundwater was estimated to be 0.016 Ci and 0.041 Ci, respectively. Therefore, the total potential estimated mass flux of tritium in groundwater reaching the Delaware River during 2019 was 0.057 Ci.

The calculated mass flux of 0.057 Ci (total of four quarterly estimates) was included in the Station's liquid effluent discharge and reported in the data tables of the Annual Radiological Effluent Release Report.

3. Investigations

A. Groundwater Monitoring Well Data (Non-RGPP)

As previously discussed, PSEG monitors a series of wells located at the Station. The ITMP is comprised of the RGPP wells, the RAWP wells, the ESP wells and a series of monitoring wells that were installed to investigate groundwater quality, but are not included as part of the RGPP, RAWP, or ESP. Three new monitoring wells (wells BH-V, BM-V, and BY-V) were installed within the Vincentown Formation to refine the conceptual site model at HCGS. Well construction details and tritium analytical results for the wells described above that are not specifically part of the RGPP are presented on Table 3 and Table 7, respectively.

B. Past Spills and Leaks: Impacts to Groundwater

In 2019, there were no known active unmonitored or unevaluated releases into the groundwater at the Station.

III. RGPP 2020 Status

The RGPP long-term sampling program will be modified as required to meet the RGPP objectives. Baseline sampling and analysis of groundwater is planned to continue on the following schedule:

- Tritium will be analyzed at least semi-annually each calendar year to a detection capability less than or equal to 200 pCi/L;
- Plant-related gamma emitters will be analyzed at least semi-annually to the environmental detection limits specified in the ODCM;
- Nickel 63 will be analyzed biennially starting in 2020;
- RGPP monitoring well sample frequency will be adjusted as needed based on analytical results.

IV. References

1. Arcadis, 2004. Remedial Investigation Work Plan. PSEG Nuclear LLC. Salem Generating Station, Hancocks Bridge, New Jersey.
2. Arcadis, 2006A. Site Investigation Report July 2006. PSEG Nuclear LLC. Hope Creek Generating Station, Hancock's Bridge, New Jersey.
3. Arcadis, 2006B. Site Investigation Report July 2006. PSEG Nuclear LLC. Salem Generating Station, Hancock's Bridge, New Jersey.
4. Arcadis, 2013. Revised Salem Unit 2 Remedial Investigation Work Plan Addendum. PSEG Nuclear LLC. December 2013.
5. Arcadis, 2014. Remedial Action Work Plan Addendum. PSEG Nuclear LLC. Salem, Hancock's Bridge, New Jersey. April 10, 2014.
6. NEI, 2007. NEI 07-07, Industry Groundwater Protection Initiative – Final Guidance Document, Nuclear Energy Institute, Washington, DC, June 2007.

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Table 1. RGPP Well Construction Details, HCGS

Well ID	Installation Date	Construction Details	Diameter (inches)	Total Depth (feet bgs)	Monitoring Interval (feet bgs)	MP Elevation (feet RPD)	MP Elevation (feet amsl)	Monitoring Purpose	Source Targets
Well BH	May-06	Sch-40 PVC	4	37.0	27.0 - 37.0	101.16	11.24	Perimeter	NA
Well BI	May-06	Sch-40 PVC	4	37.0	27.0 - 37.0	103.07	13.15	Source	Facilities; Piping
Well BJ	May-06	Sch-40 PVC	4	38.0	28.0 - 38.0	102.97	13.05	Source	Condensate Storage & Transfer; Facilities; Piping
Well BK	May-06	Sch-40 PVC	4	38.5	28.5 - 38.5	101.42	11.50	Perimeter	NA
Well BL	May-06	Sch-40 PVC	4	37.0	27.0 - 37.0	102.69	12.77	Perimeter	NA
Well BM	May-06	Sch-40 PVC	4	37.5	27.5 - 37.5	102.75	12.83	Source	Facilities; Piping
Well BN	May-06	Sch-40 PVC	4	12.5	7.5 - 12.5	102.64	12.72	Source	Auxiliary Boiler Building; Piping
Well BO	May-06	Sch-40 PVC	4	35.0	25.0 - 35.0	97.98	8.06	Perimeter/Source	Building Sewage
Well BP	May-06	Sch-40 PVC	4	38.0	28.0 - 38.0	99.06	9.14	Perimeter/Source	Building Sewage
Well BQ	May-06	Sch-40 PVC	4	42.0	32.0 - 42.0	105.62	15.70	Source	Auxiliary Boiler Building; Dry Cask Storage Building; Piping
Well BR	May-06	Sch-40 PVC	4	40.5	30.5 - 40.5	104.28	14.36	Perimeter/Source	Piping; Dry Cask Storage Building
Well BS	May-06	Sch-40 PVC	4	35.0	25.0 - 35.0	100.55	10.63	Upgradient	NA
Well BT	May-06	Sch-40 PVC	4	38.5	28.5 - 38.5	99.60	9.68	Upgradient	NA

Notes:

MP Measuring Point
 bgs Below ground surface
 RPD Relative to plant datum
 amsl Above mean sea level (NAVD 1988)
 NA Not applicable

2019 SGS AND HCGS ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Table 2. RGPP Well Construction Details, SGS

Well ID	Installation Date	Construction Details	Diameter (inches)	Total Depth (feet bgs)	Monitoring Interval (feet bgs)	MP Elevation (feet RPD)	MP Elevation (feet amsl)	Monitoring Purpose	Source Targets
Well T	Jun-03	Sch-40 PVC	2	31.2	21.2 - 31.2	104.13	14.21	Source	Facilities; House Heating Boiler
Well U ¹	May-03	Sch-40 PVC	2	32.2	27.2 - 32.2	101.46	11.54	Source	Facilities; House Heating Boiler
Well Y	Sep-03	Sch-40 PVC	2	37.0	27.0 - 37.0	101.81	11.89	Perimeter	NA
Well Z	Sep-03	Sch-40 PVC	2	37.5	27.5 - 37.5	101.86	11.94	Perimeter	NA
Well AL	Jan-04	Sch-40 PVC	2	25.3	15.3 - 25.3	99.13	9.21	Perimeter	NA
Well BA	May-06	Sch-40 PVC	4	39.5	29.5 - 39.5	101.07	11.15	Perimeter	NA
Well BB ¹	May-06	Sch-40 PVC	4	47.0	37.0 - 47.0	102.18	12.26	Perimeter	NA
Well BC	May-06	Sch-40 PVC	4	38.0	28.0 - 38.0	98.78	8.86	Source / Perimeter	Facilities; RAP Tanks; Piping
Well BD	May-06	Sch-40 PVC	4	40.5	30.5 - 40.5	98.78	8.86	Source	Facilities; RAP Tanks; Piping
Well BE	May-06	Sch-40 PVC	4	37.0	27.0 - 37.0	98.31	8.39	Perimeter	NA
Well BF ¹	May-06	Sch-40 PVC	4	42.0	32.0 - 42.0	101.45	11.53	Perimeter	NA
Well BG ¹	May-06	Sch-40 PVC	4	37.0	27.0 - 37.0	103.34	13.42	Perimeter	NA
Well BU	May-06	Sch-40 PVC	4	36.0	26.0 - 36.0	100.16	10.24	Upgradient	NA

Notes:

- MP Measuring Point
- bgs Below ground surface
- RPD Relative to plant datum
- amsl Above mean sea level (NAVD 1988)
- NA Not applicable

¹ Monitoring wells U, BB, BF, and BG were surveyed in July/August 2013 following retrofitting or repair activities.

Table 3. Well Construction Details, Investigation and Monitoring Wells

Well ID	Installation Date	Construction Details	Diameter (inches)	Total Depth (feet bgs)	Monitoring Interval (feet bgs)	Monitored Hydrogeologic Unit	MP Elevation (feet RPD)	MP Elevation (feet amsl)
Well K	Feb-03	Sch-40 PVC	2	80.0	70.0 - 80.0	Vincentown ¹	102.00	12.08
Well L	Jan-03	Sch-40 PVC	2	80.0	70.0 - 80.0	Vincentown ¹	101.46	11.54
Well M	May-03	Sch-40 PVC	1	20.0	10.0 - 20.0	Cofferdam ²	102.17	12.25
Well N	Jan-03	Sch-40 PVC	2	20.0	10.0 - 20.0	Cofferdam ²	101.65	11.73
Well O	Jan-03	Sch-40 PVC	2	20.0	10.0 - 20.0	Cofferdam ²	101.33	11.41
Well P	Mar-03	Sch-40 PVC	2	80.0	70.0 - 80.0	Vincentown ¹	101.13	11.21
Well Q	Mar-03	Sch-40 PVC	2	80.0	70.0 - 80.0	Vincentown ¹	106.59	16.67
Well EOW-4L	Jan-09	Sch-40 PVC	2	120.2	110.2-120.2	Vincentown ¹	112.23	22.31
Well R	Jun-03	Sch-40 PVC	1	19.0	9.0 - 19.0	Cofferdam ²	102.35	12.43
Well S ⁴	May-03	Sch-40 PVC	2	34.7	24.7 - 34.7	Shallow ³	99.04	9.12
Well S-V	May-14	Sch-40 PVC	4	85.0	75.0 - 85.0	Vincentown ¹	101.00	11.08
Well V ⁶	Jun-03	Sch-40 PVC	2	79.5	69.5 - 79.5	Vincentown ¹	101.72	11.80
Well W ⁶	Jun-03	Sch-40 PVC	2	35.0	25.0 - 35.0	Shallow ³	98.49	8.57
Well AA ⁴	Sep-03	Sch-40 PVC	2	36.0	26.0 - 36.0	Shallow ³	99.07	9.15
Well AA-V	May-13	Sch-40 PVC	2	85.0	75.0 - 85.0	Vincentown ¹	100.80	10.88
Well AB ⁴	Oct-03	Sch-40 PVC	2	42.0	32.0- 42.0	Shallow ³	98.93	9.01
Well AC ⁴	Sep-03	Sch-40 PVC	2	24.0	14.0 - 24.0	Cofferdam ²	98.77	8.85
Well AD ⁴	Oct-03	Sch-40 PVC	6	43.0	33.0 - 43.0	Shallow ³	98.99	9.07
Well AE	Oct-03	Sch-40 PVC	2	27.5	17.5 - 27.5	Cofferdam ²	101.54	11.62
Well AF	Oct-03	Sch-40 PVC	2	45.0	35.0 - 45.0	Shallow ³	101.61	11.69
Well AF-V	Nov-16	Sch-40 PVC	4	91.0	71.0 - 91.0	Vincentown ¹	101.38	11.46
Well AG-Shallow	Feb-04	Sch-40 PVC	1	24.2	14.2 - 24.2	Shallow ³	99.29	9.37
Well AG-Deep	Feb-04	Sch-40 PVC	1	40.0	30.0 - 40.0	Shallow ³	99.20	9.28
Well AH-Shallow	Feb-04	Sch-40 PVC	1	24.5	14.5 - 24.5	Shallow ³	102.58	12.66
Well AH-Deep	Feb-04	Sch-40 PVC	1	40.0	30.0 - 40.0	Shallow ³	102.70	12.78

Table 3. Well Construction Details, Investigation and Monitoring Wells

Well ID	Installation Date	Construction Details	Diameter (inches)	Total Depth (feet bgs)	Monitoring Interval (feet bgs)	Monitored Hydrogeologic Unit	MP Elevation (feet RPD)	MP Elevation (feet amsl)
Well AI	Jan-04	Sch-40 PVC	4	22.0	12.0 - 22.0	Cofferdam ²	98.79	8.87
Well AJ	Jan-04	Sch-40 PVC	4	35.3	15.3 - 35.3	Shallow ³	98.85	8.93
Well AM	Jan-04	Sch-40 PVC	4	20.9	10.9 - 20.9	Cofferdam ²	98.55	8.63
Well AN	Jun-04	Sch-40 PVC	4	25.0	10.0 - 25.0	Cofferdam ²	98.76	8.84
Well AO	Jun-04	Sch-40 PVC	4	21.0	11.0 - 21.0	Cofferdam ²	98.82	8.90
Well AP	Jun-04	Sch-40 PVC	4	40.0	15.0 - 40.0	Shallow ³	98.65	8.73
Well AQ ⁵	Jun-04	Sch-40 PVC	4	45.0	20.0 - 45.0	Shallow ³	99.05	9.13
Well AR	Jun-04	Sch-40 PVC	4	43.0	18.0 - 43.0	Shallow ³	99.22	9.30
Well AS	Jun-04	Sch-40 PVC	4	41.5	16.5 - 41.5	Shallow ³	99.44	9.52
Well AT	Jun-04	Sch-40 PVC	4	44.0	19.0 - 44.0	Shallow ³	99.25	9.33
Well BW ⁶	Dec-06	Sch-40 PVC	1	10.0	5.0 - 10.0	Shallow ³	101.62	11.70
Well BX ⁶	Dec-06	Sch-40 PVC	1	10.0	5.0 - 10.0	Shallow ³	101.79	11.87
Well BY	Nov-10	Sch-40 PVC	4	40.0	35.0 - 40.0	Shallow ³	103.36	13.44
Well BZ	Nov-10	Sch-40 PVC	4	36.0	31.0 - 36.0	Shallow ³	104.29	14.37
Well CA ⁶	Dec-06	Sch-40 PVC	4	38.0	28.0 - 38.0	Shallow ³	101.96	12.04
Well CB ⁷	Dec-06	Sch-40 PVC	2	80.0	70.0 - 80.0	Vincentown ¹	98.98	9.06
Well DA ⁶	Nov-10	Sch-40 PVC	4	17.0	12.0 - 17.0	Cofferdam ²	99.04	9.12
Well DB	Nov-10	Sch-40 PVC	4	21.0	16.0 - 21.0	Cofferdam ²	101.69	11.77
Well DC	Nov-10	Sch-40 PVC	4	22.0	17.0 - 22.0	Cofferdam ²	100.90	10.98
Well DD	Nov-10	Sch-40 PVC	4	19.0	14.0 - 19.0	Cofferdam ²	101.23	11.31
Well DE	Nov-10	Sch-40 PVC	4	18.0	13.0 - 18.0	Cofferdam ²	101.43	11.51
Well DF	Nov-10	Sch-40 PVC	4	19.0	14.0 - 19.0	Cofferdam ²	101.32	11.40
Well DG	Nov-10	Sch-40 PVC	2	13.5	11.5 - 13.5	Cofferdam ²	98.98	9.06

Table 3. Well Construction Details, Investigation and Monitoring Wells

Well ID	Installation Date	Construction Details	Diameter (inches)	Total Depth (feet bgs)	Monitoring Interval (feet bgs)	Monitored Hydrogeologic Unit	MP Elevation (feet RPD)	MP Elevation (feet amsl)
Well DH	Oct-10	Sch-40 PVC	4	21.0	16.0 - 21.0	Cofferdam ²	101.54	11.62
Well DI	Oct-10	Sch-40 PVC	4	18.0	13.0 - 18.0	Cofferdam ²	101.64	11.72
Well DJ	Oct-10	Sch-40 PVC	2	11.0	6.0 - 11.0	Cofferdam ²	99.03	9.11

Notes:

MP Measuring point

bgs Below ground surface

RPD Relative to plant datum

amsl Above mean sea level (NAVD 1988)

¹ Monitoring well is screened in the Vincentown Formation.

² Monitoring well is screened in the shallow, water-bearing unit at a location within the limits of the cofferdam.

³ Monitoring well is screened in the shallow, water-bearing unit at a location outside the limits of the cofferdam.

⁴ The surface completions of Monitoring Wells S, AA, AB, AC, and AD were converted from above-grade to flush-grade in February 2004.

⁵ Monitoring well AQ was abandoned in November 2016.

⁶ Monitoring wells BW, BX, CA, DA, V, and W were surveyed in July/August 2013 following retrofitting or repair activities.

⁷ Monitoring well CB was abandoned in May 2013

Table 4. Relevant Groundwater Evaluation Criteria, SGS and HCGS

Isotope	RGPP LLD (pCi/L)	PSEG Reporting Level (pCi/L)
Tritium	200	30,000
Total Strontium	2	8
Mn-54	15	1,000
Fe-59	30	400
Co-60	15	300
Zn-65	30	300
Nb-95	15	400
Zr-95	15	400
Cs-134	15	30
Cs-137	18	50
Ba-140	60	200
La-140	15	200

Notes:

LLD Lower Limit of Detection
pCi/L Picocuries per liter

Table 5. Tritium Analytical Results, HCGS RGPP Wells

Well ID	Sample Date	Tritium Result (pCi/L)
Well BH	2/6/2019	<191
Well BH	5/6/2019	<192
Well BH	8/7/2019	<186
Well BH	11/6/2019	<192
Well BI	2/7/2019	567
Well BI	5/6/2019	1,340
Well BI	6/13/2019	1,050
Well BI	7/2/2019	775
Well BI	8/5/2019	469
Well BI	9/5/2019	392
Well BI	11/6/2019	254
Well BJ	1/7/2019	2,810
Well BJ	2/7/2019	3,010
Well BJ	3/4/2019	3,110
Well BJ	4/1/2019	3,570
Well BJ	4/11/2019	3,130
Well BJ	5/9/2019	2,990
Well BJ	6/5/2019	2,770
Well BJ	7/3/2019	2,990
Well BJ	8/6/2019	3,810
Well BJ	9/5/2019	3,600
Well BJ	9/30/2019	3,690
Well BJ	11/5/2019	3,720
Well BJ	12/3/2019	5,140
Well BK	5/6/2019	<189
Well BK	11/6/2019	<192
Well BL	5/6/2019	<188
Well BL	11/6/2019	<190
Well BM	2/6/2019	420
Well BM	5/6/2019	466
Well BM	8/7/2019	529
Well BM	11/6/2019	494
Well BN	2/5/2019	2,270
Well BN	5/7/2019	1,530
Well BN	8/8/2019	546
Well BN	9/3/2019	781
Well BN	9/30/2019	393
Well BN	11/7/2019	500

Table 5. Tritium Analytical Results, HCGS RGPP Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well BO	2/5/2019	1,070
Well BO	5/7/2019	1,290
Well BO	8/8/2019	<198
Well BO	11/7/2019	437
Well BP	5/7/2019	<188
Well BP	11/8/2019	<187
Well BQ	2/5/2019	<193
Well BQ	5/9/2019	<187
Well BQ	8/7/2019	<196
Well BQ	11/6/2019	<192
Well BR	5/7/2019	<191
Well BR	11/7/2019	<193
Well BS	5/7/2019	<191
Well BS	11/7/2019	<195
Well BT	5/7/2019	<190
Well BT	11/7/2019	<188

Notes:

pCi/L Picocuries per liter
 < Tritium not detected above indicated concentration
251 Bolded values indicate tritium was detected

Table 6. Tritium Analytical Results, SGS RGPP Wells

Well ID	Sample Date	Tritium Result (pCi/L)
Well AL	5/8/2019	398
Well AL	11/7/2019	697
Well BA	5/8/2019	<186
Well BA	11/5/2019	<185
Well BB	5/8/2019	<186
Well BB	11/5/2019	<185
Well BC	2/5/2019	1,270
Well BC	5/9/2019	1,750
Well BC	8/7/2019	4,180
Well BC	9/5/2019	3,190
Well BC	10/1/2019	2,280
Well BC	11/7/2019	1,750
Well BC	12/3/2019	4,780
Well BD	2/4/2019	384
Well BD	5/7/2019	471
Well BD	8/6/2019	592
Well BD	11/4/2019	411
Well BE	2/6/2019	291
Well BE	5/9/2019	755
Well BE	8/5/2019	558
Well BE	11/5/2019	523
Well BF	5/9/2019	<182
Well BF	11/5/2019	<194
Well BG	2/7/2019	217
Well BG	5/9/2019	191
Well BG	8/8/2019	254
Well BG	11/5/2019	214
Well BU	5/7/2019	<181
Well BU	11/7/2019	<187
Well T	2/7/2019	<196
Well T	5/8/2019	<193
Well T	8/5/2019	<192
Well T	11/5/2019	<188
Well U	2/4/2019	497
Well U	5/8/2019	376
Well U	8/8/2019	227
Well U	11/5/2019	348
Well Y	5/8/2019	<191
Well Y	11/6/2019	<186

Table 6. Tritium Analytical Results, SGS RGPP Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well Z	5/8/2019	514
Well Z	11/5/2019	545

Notes:

pCi/L

Picocuries per liter

<

Tritium not detected above indicated concentration

545

Bolded values indicate tritium was detected

Table 7. Tritium Analytical Results, Investigation & Monitoring Wells

Well ID	Sample Date	Tritium Result (pCi/L)
Well AA	2/5/2019	1,120
Well AA	7/11/2019	1,300
Well AA-V	1/11/2019	4,270
Well AA-V	4/4/2019	4,310
Well AA-V	7/11/2019	5,680
Well AA-V	9/30/2019	5,410
Well AB	1/9/2019	5,800
Well AB	10/16/2019	6,730
Well AC	1/7/2019	27,300
Well AC	2/4/2019	21,300
Well AC	3/4/2019	33,200
Well AC	4/2/2019	47,800
Well AC	5/7/2019	62,600
Well AC	6/4/2019	35,500
Well AC	7/8/2019	52,600
Well AC	8/6/2019	38,100
Well AC	9/4/2019	34,600
Well AC	10/1/2019	48,300
Well AC	11/4/2019	16,900
Well AC	12/3/2019	29,400
Well AD	1/9/2019	11,100
Well AD	4/3/2019	7,170
Well AD	10/16/2019	9,630
Well AE	1/8/2019	8,110
Well AE	4/3/2019	9,410
Well AE	7/10/2019	12,000
Well AE	10/1/2019	9,750
Well AF	1/8/2019	232
Well AF	7/11/2019	240
Well AF-V	1/8/2019	472
Well AF-V	4/3/2019	313
Well AF-V	7/11/2019	426
Well AF-V	9/30/2019	252
Well AG-D	1/9/2019	834
Well AG-D	7/9/2019	964

Table 7. Tritium Analytical Results, Investigation & Monitoring Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well AG-S	1/9/2019	847
Well AG-S	7/9/2019	944
Well AH-D	1/8/2019	932
Well AH-D	7/11/2019	879
Well AH-S	1/8/2019	792
Well AH-S	7/11/2019	1,080
Well AI	1/7/2019	1,970
Well AI	7/9/2019	4,310
Well AJ	10/16/2019	4,970
Well AM	1/7/2019	37,100
Well AM	2/4/2019	13,100
Well AM	3/4/2019	15,600
Well AM	4/2/2019	14,300
Well AM	5/7/2019	7,030
Well AM	6/4/2019	33,400
Well AM	7/8/2019	10,900
Well AM	8/6/2019	13,200
Well AM	9/4/2019	5,470
Well AM	10/1/2019	6,140
Well AN	1/9/2019	11,600
Well AN	2/6/2019	21,100
Well AN	3/4/2019	17,000
Well AN	4/3/2019	22,200
Well AN	5/7/2019	23,800
Well AN	6/4/2019	21,800
Well AN	7/9/2019	21,400
Well AN	8/7/2019	3,670
Well AN	9/4/2019	22,300
Well AN	10/16/2019	24,600
Well AN	11/7/2019	24,600
Well AN	12/4/2019	22,700
Well AP	1/9/2019	4,310
Well AP	4/4/2019	1,840
Well AP	5/8/2019	1,530
Well AP	6/5/2019	1,960
Well AP	7/12/2019	1,700
Well AP	8/6/2019	1,630
Well AP	9/5/2019	1,200
Well AP	10/3/2019	1,200

Table 7. Tritium Analytical Results, Investigation & Monitoring Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well AR	1/11/2019	6,540
Well AR	4/4/2019	6,380
Well AR	7/11/2019	6,810
Well AR	9/30/2019	6,010
Well AS	1/11/2019	3,460
Well AS	7/11/2019	5,520
Well AT	1/9/2019	1,680
Well AT	7/9/2019	2,030
Well BH-V	7/2/2019	321
Well BH-V	7/2/2019	194
Well BH-V	7/2/2019	<192
Well BH-V	7/2/2019	<190
Well BH-V	8/7/2019	<182
Well BH-V	9/5/2019	211
Well BH-V	10/2/2019	<193
Well BH-V	7/2/2019	321
Well BM-V	7/3/2019	<195
Well BM-V	7/3/2019	<192
Well BM-V	7/3/2019	<194
Well BM-V	7/3/2019	<192
Well BM-V	8/7/2019	<186
Well BM-V	9/5/2019	<193
Well BM-V	10/2/2019	<193
Well BW	5/8/2019	660
Well BW	11/4/2019	636
Well BX	5/8/2019	656
Well BX	11/4/2019	350
Well BY	1/7/2019	64,700
Well BY	2/4/2019	178,000
Well BY	3/4/2019	301,000
Well BY	4/1/2019	322,000
Well BY	4/11/2019	329,000
Well BY	5/6/2019	316,000
Well BY	5/9/2019	264,000
Well BY	6/5/2019	249,000
Well BY	6/13/2019	215,000
Well BY	7/1/2019	190,000
Well BY	7/15/2019	180,000
Well BY	8/5/2019	187,000

Table 7. Tritium Analytical Results, Investigation & Monitoring Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well BY	9/4/2019	159,000
Well BY	10/2/2019	154,000
Well BY	11/6/2019	184,000
Well BY	12/3/2019	189,000
Well BY-V	6/7/2019	<873
Well BY-V	6/7/2019	<858
Well BY-V	6/7/2019	<834
Well BY-V	6/7/2019	<829
Well BY-V	6/7/2019	<840
Well BY-V	7/1/2019	3,040
Well BY-V	7/1/2019	1,990
Well BY-V	7/1/2019	479
Well BY-V	7/1/2019	271
Well BY-V	8/5/2019	4,400
Well BY-V	9/4/2019	6,390
Well BY-V	10/2/2019	7,200
Well BZ	5/9/2019	977
Well BZ	11/6/2019	1,030
Well CA	1/8/2019	1,480
Well CA	7/12/2019	1,470
Well DA	1/7/2019	4,170
Well DA	4/3/2019	3,970
Well DA	7/8/2019	3,830
Well DA	9/30/2019	2,720
Well DB	1/7/2019	8,220
Well DB	2/4/2019	9,090
Well DB	3/4/2019	9,200
Well DB	4/2/2019	9,330
Well DB	5/7/2019	12,200
Well DB	6/4/2019	15,900
Well DB	7/10/2019	18,400
Well DB	8/6/2019	16,400
Well DB	9/4/2019	13,900
Well DB	9/30/2019	10,300
Well DB	11/4/2019	8,910
Well DB	12/3/2019	11,400
Well DC	1/10/2019	7,090
Well DC	5/7/2019	6,130
Well DC	6/4/2019	3,740
Well DC	7/10/2019	3,190

Table 7. Tritium Analytical Results, Investigation & Monitoring Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well DC	8/6/2019	3,630
Well DC	9/4/2019	5,340
Well DC	9/30/2019	3,920
Well DC	11/4/2019	3,150
Well DC	12/3/2019	3,620
Well DD	1/10/2019	6,230
Well DD	4/2/2019	5,760
Well DD	7/10/2019	6,260
Well DD	9/30/2019	6,360
Well DE	1/10/2019	10,900
Well DE	4/2/2019	15,000
Well DE	7/10/2019	20,600
Well DE	9/4/2019	20,600
Well DE	9/30/2019	19,100
Well DE	11/4/2019	17,800
Well DE	12/3/2019	18,200
Well DF	1/10/2019	1,340
Well DF	7/10/2019	1,150
Well DG	1/10/2019	4,170
Well DG	4/2/2019	4,400
Well DG	7/8/2019	3,360
Well DG	9/30/2019	3,620
Well DH	1/8/2019	9,630
Well DH	4/1/2019	7,670
Well DH	7/12/2019	9,540
Well DH	10/2/2019	10,400
Well DI	1/8/2019	3,030
Well DI	4/1/2019	2,270
Well DI	7/12/2019	2,100
Well DI	10/2/2019	2,090
Well DJ	1/8/2019	1,250
Well DJ	7/12/2019	1,450
Well K	1/10/2019	<197
Well K	7/9/2019	<198
Well EOW-4L [†]	1/9/2019	<195
Well EOW-4L [†]	7/1/2019	<188
Well L	1/8/2019	<193
Well L	7/9/2019	<189
Well M	1/11/2019	5,430
Well M	4/3/2019	5,920

Table 7. Tritium Analytical Results, Investigation & Monitoring Wells (cont.)

Well ID	Sample Date	Tritium Result (pCi/L)
Well M	7/8/2019	6,090
Well M	10/3/2019	6,580
Well N	1/7/2019	6,150
Well N	4/2/2019	5,770
Well N	7/8/2019	7,910
Well N	10/1/2019	7,120
Well O	1/8/2019	15,400
Well O	4/3/2019	39,900
Well O	7/10/2019	16,700
Well O	10/1/2019	10,200
Well P	1/9/2019	<198
Well P	7/2/2019	<189
Well R	1/8/2019	3,100
Well R	7/15/2019	3,970
Well S	1/9/2019	22,700
Well S	4/3/2019	17,800
Well S	7/9/2019	21,500
Well S	10/16/2019	10,500
Well S-V	1/9/2019	2,600
Well S-V	4/4/2019	3,090
Well S-V	7/15/2019	2,920
Well S-V	10/1/2019	3,040
Well V	1/10/2019	334
Well V	7/10/2019	291
Well W	1/10/2019	4,210
Well W	4/2/2019	4,090
Well W	7/9/2019	2,650
Well W	10/3/2019	2,340

Notes:

pCi/L

Picocuries per liter

*

AC-MT samples are collected from a mobile water tank during purge activities associated with well AC.

†

EOW-4L is presented as supplemental data for Well Q

<

Tritium not detected above indicated concentration

545

Bolded values indicate tritium was detected

20,000

Tritium was detected above the New Jersey Department of Environmental Protection (NJDEP) Class II-A Groundwater Quality Standard (GWQS) of 20,000 pCi/L.

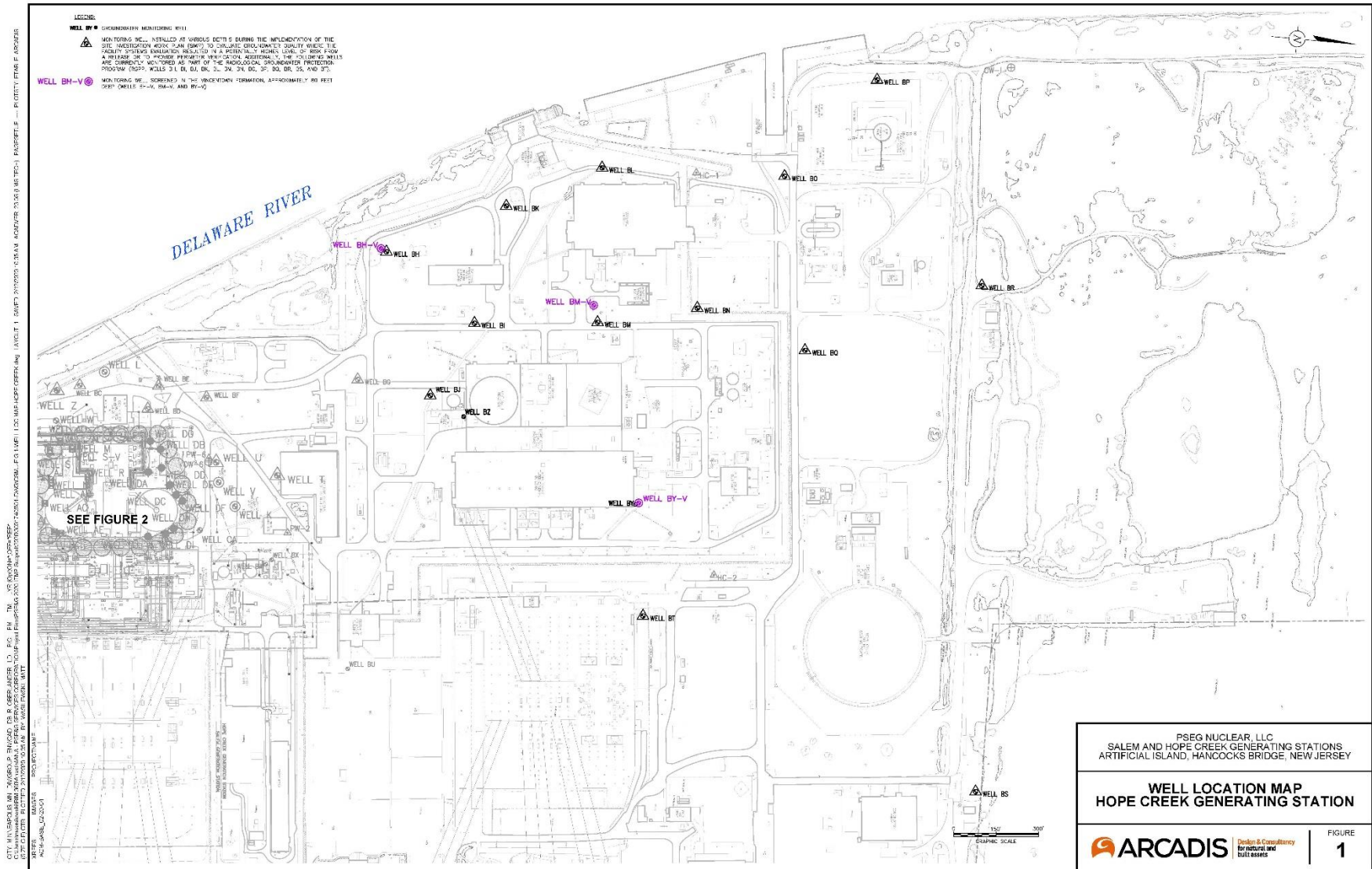


Figure 1. Well Location Map, Hope Creek Generating Station

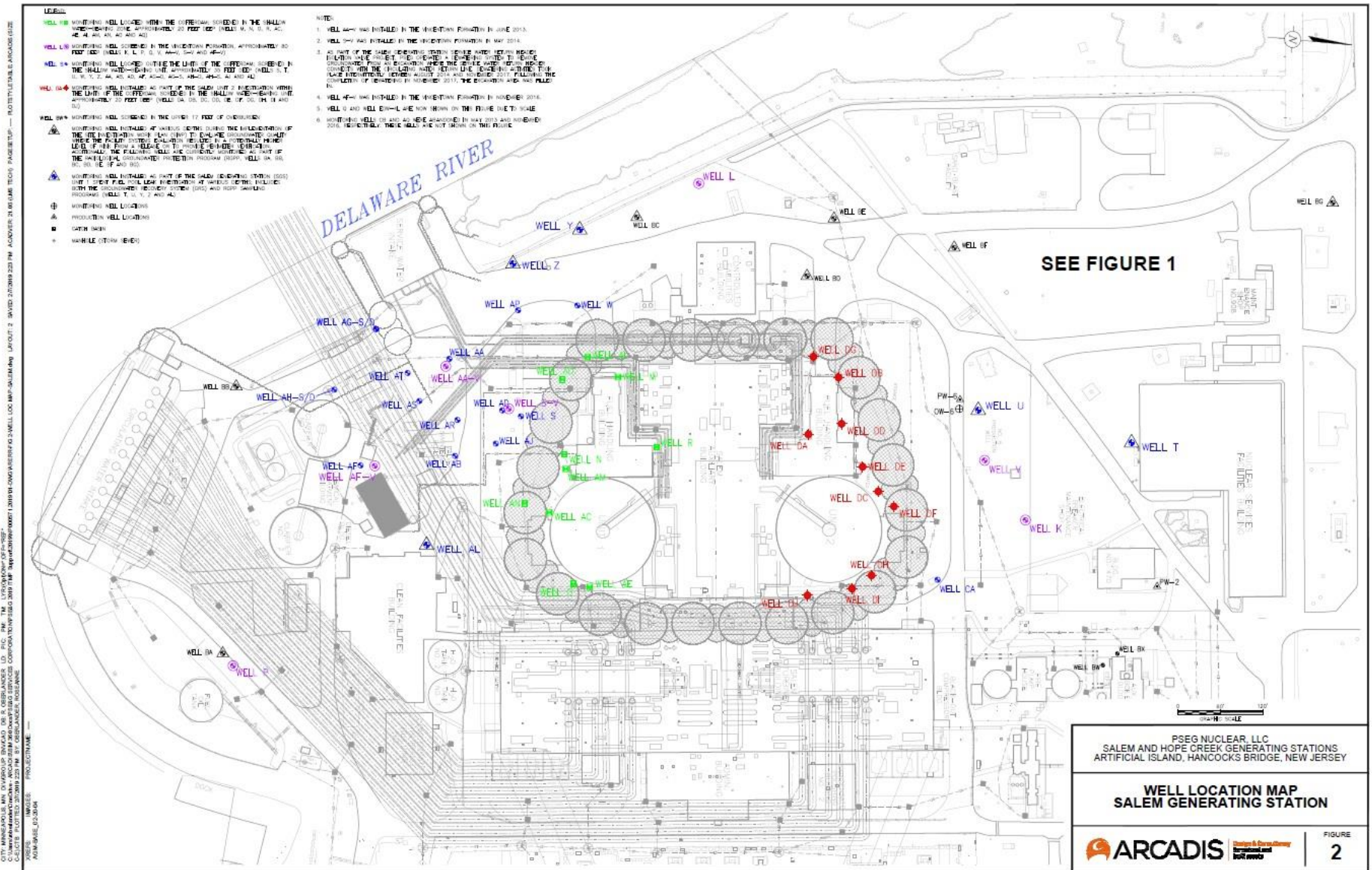


Figure 2. Well Location Map, Salem Generating Station