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U.S. Nuclear Regulatory Commission
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DOMINION ENERGY NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 1, 2, AND 3
2019 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

This letter transmits the Annual Radiological Environmental Operating Report for the Millstone Power Station, for the period January 2019 through December 2019. This satisfies the provisions of Section 5.7.2 of Millstone Power Station Unit 1 Permanently Defueled Technical Specifications (PDTs), and Sections 6.9.1.6a and 6.9.1.3 of the Millstone Power Station Units 2 and 3 Technical Specifications, respectively.

Should you have any questions, please contact Mr. Jeffrey A. Langan at (860) 444-5544.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. J. Armstrong".

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Attachments: 1

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1. None.

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ATTACHMENT 1

2019 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

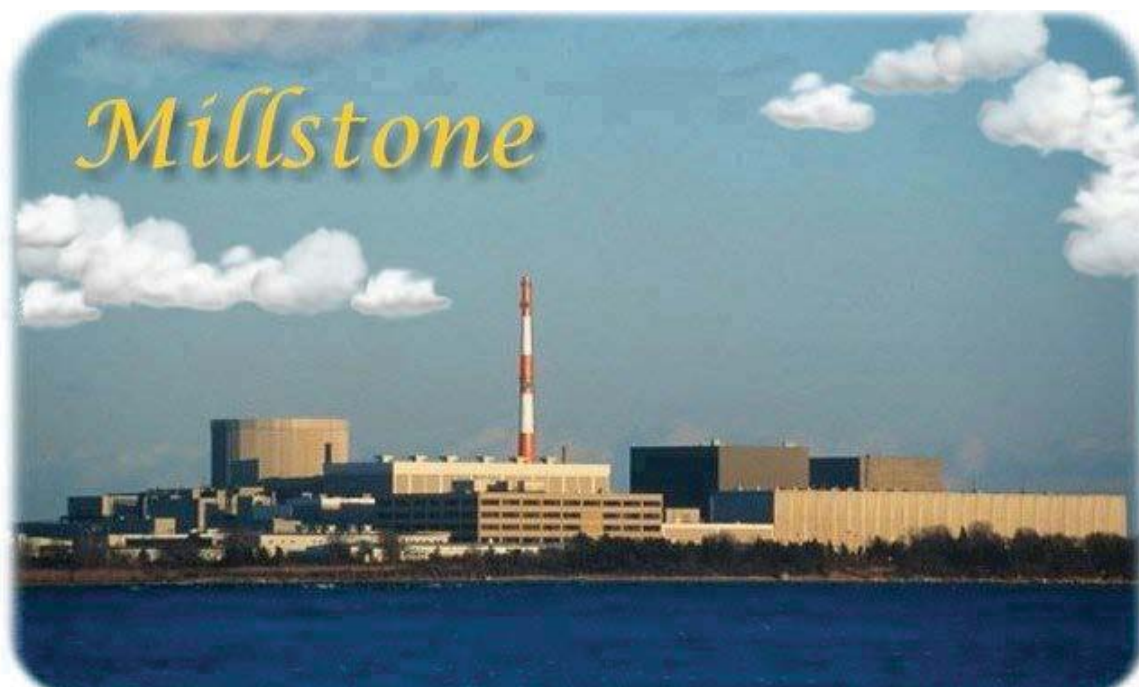
**MILLSTONE POWER STATION UNITS 1, 2, AND 3
DOMINION ENERGY NUCLEAR CONNECTICUT, INC. (DENC)**

Millstone Power Station

2019

Radiological Environmental Operating Report

January 1, 2019 – December 31, 2019



Dominion Nuclear Connecticut, Inc.

Unit	License	Docket
1	DPR-21	50-245
2	DPR-65	50-336
3	NPF-49	50-423



**ANNUAL
RADIOLOGICAL ENVIRONMENTAL
OPERATING REPORT**

MILLSTONE POWER STATION

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

2019

**Millstone Power Station Unit 1, DOCKET NO. 50-245
Millstone Power Station Unit 2, DOCKET NO. 50-336
Millstone Power Station Unit 3, DOCKET NO. 50-423**

**Dominion Nuclear Connecticut, Inc.
Waterford, Connecticut**

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EXECUTIVE SUMMARY

INTRODUCTION

This report summarizes the results of the Radiological Environmental Monitoring Program (REMP) conducted in the vicinity of the Millstone Nuclear Power Station (MPS) during the period from January 1 to December 31, 2019. This document has been prepared in accordance with the requirements of the separate MPS Unit 1 (MPS1) Permanently Defueled Technical Specifications and the Technical Specifications for Millstone Units 2 and 3 (MPS2 and MPS3).

The REMP has been established to monitor the radiation and radioactivity released to the environment as a result of MPS's operation. This program, initiated in April 1967, includes the collection, analysis, and evaluation of radiological data in order to assess the impact of MPS on the environment and on the general public.

SAMPLING AND ANALYSIS

The environmental sampling media collected in the vicinity of MPS and at distant locations included aquatic, atmospheric, and terrestrial samples. These samples were air particulate filters, charcoal cartridges, soil, well water, broadleaf vegetation, fruits and vegetables, seawater, bottom sediment, aquatic flora, fish, oysters, clams, and lobsters.

During 2019, there were 546 samples collected from the atmospheric, aquatic, and terrestrial environments. In addition, 172 exposure measurements were obtained using environmental thermoluminescent dosimeters (TLDs). A discussion of all discrepancies from the sample collection requirements in the MPS Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) is given in Section 2.3 of this report. Teledyne Brown Engineering, Inc. of Knoxville, Tennessee performed the sample analyses and Environmental Dosimetry Company of Sterling, Massachusetts performed the TLD analyses.

LAND USE CENSUS

The annual land use census in the vicinity of MPS was conducted as required by the MPS REMODCM. To determine the dairy exposure pathway, a list of cow milk and goat milk locations is established. The list of cow milk locations is identified by a review of the annual registration information obtained from the State of Connecticut Department of Agriculture. The list of goat milk locations is identified by the information obtained from the American Dairy Goat Association list and by inspections performed in the field. Although broadleaf sampling was performed and may be used in lieu of a garden census, gardens were included in the 2019 census. Only vegetable gardens having an area of more than 500 square feet were identified. Due to the difficulty of measuring individual gardens, the nearest garden within each directional sector identified by a drive-by survey is listed. However, for dose calculation, garden distances are based on nearest resident assuming that a resident may plant a new garden. This gives a more conservative dose result.

RADIOLOGICAL IMPACT TO THE ENVIRONMENT

The radionuclides detected in some samples were from non-station, naturally occurring radionuclides.

All terrestrial samples collected as part of the MPS REMP did not show any station related isotopes.

The seawater exiting the stations quarry is monitored for all station generated radionuclides. Tritium was only found in seawater onsite inside the mixing zone of the quarry discharge at levels that were expected from routine station operation.

Offsite ambient radiation measurements using environmental TLDs beyond the site boundary ranged between 39 - 100 milliRoentgens (mrem) per year. The range of ambient radiation levels observed with the TLDs is consistent with natural background radiation levels for Connecticut.

RADIOLOGICAL IMPACT TO THE GENERAL PUBLIC

During 2019, radiation doses to the general public as a result of Millstone's operation continued to be well below the federal limits and much less than the dose due to other sources of man-made (e.g., X-rays, medical) and naturally-occurring (e.g., cosmic, radon) radiation.

The calculated total body (whole body) dose to the maximally exposed member of the public from radioactive effluents and ambient radiation resulting from MPS operations for 2019 was approximately 0.234 mrem for the year. This conservative estimate is well below the Environmental Protection Agency's (EPA) annual dose limit to any member of the general public and is a fraction of a percent of the typical dose received from natural and other sources of man-made radiation.

CONCLUSIONS

The 2019 REMP for MPS resulted in the collection and analysis of 718 environmental samples and measurements. The data obtained were used to determine the impact of Millstone's operation on the environment and on the general public.

An evaluation of direct radiation measurements, environmental sample analyses, and dose calculations indicates all applicable federal criteria were met with margin. Furthermore, radiation levels and the consequential dose from station operation were small in comparison to those attributed to naturally occurring and man-made background radiation.

Based on this information, there is no significant radiological impact on the environment or on the general public due to Millstone's operation.

1. INTRODUCTION

This section provides an overview of the MPS REMP. It also includes background information to allow a reader to have an informed understanding of radiation and nuclear power operation.

1.1 Overview

The 2019 REMP performed by Dominion Energy Nuclear Connecticut (DENC) for MPS is discussed in this report. Since the operation of a nuclear power station results in the release of small amounts of radioactivity and low levels of radiation, the Nuclear Regulatory Commission (NRC) requires by regulations and technical specifications that a program be established to monitor radiation and radioactivity in the environment (References 1, 6, 9, 10, & 11). This report published annually per Millstone's Technical Specifications (section 5.7.2 for MPS1, section 6.9.1.6A for MPS2 and Section 6.9.1.3 for MPS3), summarizes the results of measurements of radiation and radioactivity in the environment in the vicinity of the MPS and at distant locations during the period January 1 to December 31, 2019.

The REMP consists of taking radiation measurements and collecting samples from the environment, analyzing them for radioactivity content, and interpreting the results. With emphasis on the critical radiation exposure pathways to humans, samples from the aquatic, atmospheric, and terrestrial environments are collected. These samples include, but are not limited to: air, soil, well water, broadleaf vegetation, fruits, vegetables, seawater, bottom sediment, aquatic flora, fish, oysters, clams, and lobsters.

Thermoluminescent dosimeters (TLDs) are placed in the environment to measure gamma radiation levels. The TLDs are processed and the environmental samples are analyzed to measure the very low levels of radiation and radioactivity present in the environment as a result of MPS operation and other natural and man-made sources. These results are reviewed by Millstone's radiological staff and have been reported semiannually or annually to the NRC and others for over 30 years.

In order to more fully understand how a nuclear power station impacts humans and the environment, background information on radiation and radioactivity, natural and man-made sources of radiation, reactor operations, radioactive effluent controls, and radiological impact on humans is provided. It is believed that this information will assist the reader in understanding the radiological impact on the environment and humans from the operation of Millstone.

1.2 Radiation and Radioactivity

All matter is made of atoms. Nuclear radiation is energy or particles that are given off from atoms in an excited state (e.g., unstable, radioactive atoms).

Radioactive material exists naturally and has always been a part of our environment. The earth's crust, for example, contains radioactive uranium, radium, thorium, and potassium. Some radioactivity is a result of fallout from nuclear weapons testing. Examples of radioactive fallout that could be present in environmental samples are cesium-137 and strontium-90. Some examples of radioactive materials released from a nuclear power station are hydrogen-3 (tritium), cesium-137, iodine-131, strontium-90, and cobalt-60.

Radiation is measured in units of mrem, much like temperature is measured in degrees. A mrem is a measure of the biological effect of the energy deposited in tissue. The letter ‘m’ is for ‘milli’, or one-thousandth of a ‘rem’. The word ‘rem’ is an acronym for roentgen equivalent man. One rem is equal to a ‘rad’ multiplied by factors to account for type of radiation and distribution within the body. The word ‘rad’ is an acronym for radiation absorbed dose. One rad is equal to the absorption of 100 ergs of energy per gram of tissue. The natural and man-made radiation dose received in one year by the average American is 300 to 600 mrem (References 2, 3, 4 & 5). The per capita dose has increased since the early 1980’s because of the increased usage of medical procedures involving exposure to radiation (Reference 3).

Radioactivity is measured in Curies. Levels of radioactivity commonly seen in the environment are typically a small fraction of a Curie, therefore radioactivity in the environment is typically measured in picocuries. One picocurie (pCi) is one-trillionth of a Curie and is equal to 0.037 disintegrations per second (2.22 disintegrations per minute).

1.3 Sources of Radiation

As mentioned previously, naturally occurring radioactivity has always been a part of our environment. Table 1.3 shows the sources and doses of radiation from natural and man-made sources.

Table 1.3-1
Radiation Sources and Corresponding Approximate Doses⁽¹⁾

NATURAL		MAN-MADE	
Source	Radiation Dose (mrem/year)	Source	Radiation Dose (mrem/year)
Internal, inhalation ⁽²⁾	228	Medical ⁽³⁾	300
External, space	33	Consumer ⁽⁴⁾	13
Internal, ingestion	29	Industrial, security, educational, research	0.3
External, terrestrial	21	Occupational	0.5
		Weapons Fallout	< 1
		Nuclear Power Stations	< 1
Approximate Total	311	Approximate Total	314

(1) information from References 3 and 4

(2) from radon and thoron

(3) includes computerized tomography (147 mrem), nuclear medicine (77 mrem), interventional fluoroscopy (43 mrem) and conventional radiography and fluoroscopy (33 mrem)

(4) primarily from cigarette smoking (4.6 mrem), commercial air travel (3.4 mrem), building materials (3.5 mrem) and mining and agriculture (0.8 mrem)

Cosmic radiation (external, space) from the sun and outer space penetrates the earth's atmosphere and continuously bombards us with rays and charged particles. Some of this cosmic radiation interacts with gases and particles in the atmosphere, making them radioactive. These radioactive byproducts from cosmic ray bombardment are referred to as cosmogenic radionuclides. Isotopes such as beryllium-7 and carbon-14 are formed in this way. Exposure to cosmic and cosmogenic sources of radioactivity results in about 33 mrem of radiation dose per year.

Additionally, natural radioactivity is in our body and in the food we eat (about 29 mrem/year), the ground we walk on (about 21 mrem/year) and the air we breathe (about 228 mrem/year). The majority of a person's annual dose results from exposure to radon and thoron in the air we breathe. These gases and their radioactive decay products arise from the decay of naturally occurring uranium, thorium and radium in the soil and building products such as brick, stone, and concrete. Radon and thoron levels vary greatly with location, primarily due to changes in the concentration of uranium and thorium in the soil. Residents at some locations in Colorado, New York, Pennsylvania, New Jersey, and even Connecticut have a higher annual dose as a result of higher levels of radon/thoron gases in these areas. In total, these various sources of naturally-occurring radiation and radioactivity contribute to a total dose of about 311 mrem per year.

In addition to natural radiation, we are normally exposed to radiation from a number of man-made sources. The single largest doses from man-made sources result from therapeutic and diagnostic applications of x-rays and radiopharmaceuticals. The annual dose to an individual in the United States from medical and dental exposure is approximately 300 mrem. Consumer products/uses, such as cigarettes, building materials and commercial air travel contribute about 13 mrem/year. Much smaller doses result from weapons fallout (less than 1 mrem/year) and nuclear power stations (less than 1 mrem/year). Typically, the average person in the United States receives approximately 314 mrem per year from man-made sources.

1.4 Nuclear Reactor Operations

MPS generates about 2100 megawatts of electricity at full power, which provides approximately one-third of the power consumed in the State of Connecticut. MPS2 and MPS3 are pressurized water reactors (MPS1, which is permanently shutdown, was a boiling water reactor). The nuclear station is located on an approximate 500-acre site about 5 kilometers (three miles) west of New London, Connecticut. Commercial operation of MPS2 began in December 1975 and MPS3 in May 1986.

MPS was operational during most of 2019, with the exception of the downpowered event in April through May for MPS2 due to emergent repair activities and refueling outage in April for MPS3. The annual capacity factor for MPS2 was 95.04% and for MPS3 was 89.58%.

Nuclear-generated electricity is produced by many of the same techniques used for conventional oil and coal-generated electricity. Both systems use heat to boil water in order to produce steam. The steam turns a turbine, which turns a generator, producing electricity. In both cases, the steam passes through a condenser where it changes back into water and recirculates back through the system (see Figure 1.4-1). The cooling water source for MPS is the Niantic Bay.

The key difference between nuclear power and conventional power is the source of heat used to boil the water. Conventional stations burn fossil fuels in a boiler, while nuclear stations use uranium fission in a nuclear reactor.

Inside the reactor, a nuclear reaction called fission takes place. Particles, called neutrons, strike the nucleus of a uranium-235 atom, causing it to split into fragments called radioactive fission products. The splitting of the atoms releases both heat and more neutrons. The newly-released neutrons then collide with and split other uranium atoms, thus making more heat and releasing even more neutrons, and on and on until the uranium fuel is depleted or spent. This process is called a chain reaction. When this chain reaction is self-sustaining, the reactor is called "critical."

The operation of a nuclear reactor results in the release of small amounts of radioactivity and low levels of radiation. The radioactivity originates from two major sources, radioactive fission products and radioactive activation products. Radioactive fission products, as illustrated in Figure 1.4-1, originate from the fissioning of the nuclear fuel. These fission products get into the reactor coolant from their release by minute amounts of uranium on the outside surfaces of the fuel cladding, by diffusion through the fuel pellets and cladding and, on occasion, through defects or failures in the fuel cladding. These fission products circulate along with the reactor coolant water and will deposit on the internal surfaces of pipes and equipment. The radioactive fission products on the pipes and equipment emit radiation. Examples of some fission products are krypton-85 (Kr-85), strontium-90 (Sr-90), iodine-131 (I-131), xenon-133 (Xe-133), and cesium-137 (Cs-137).

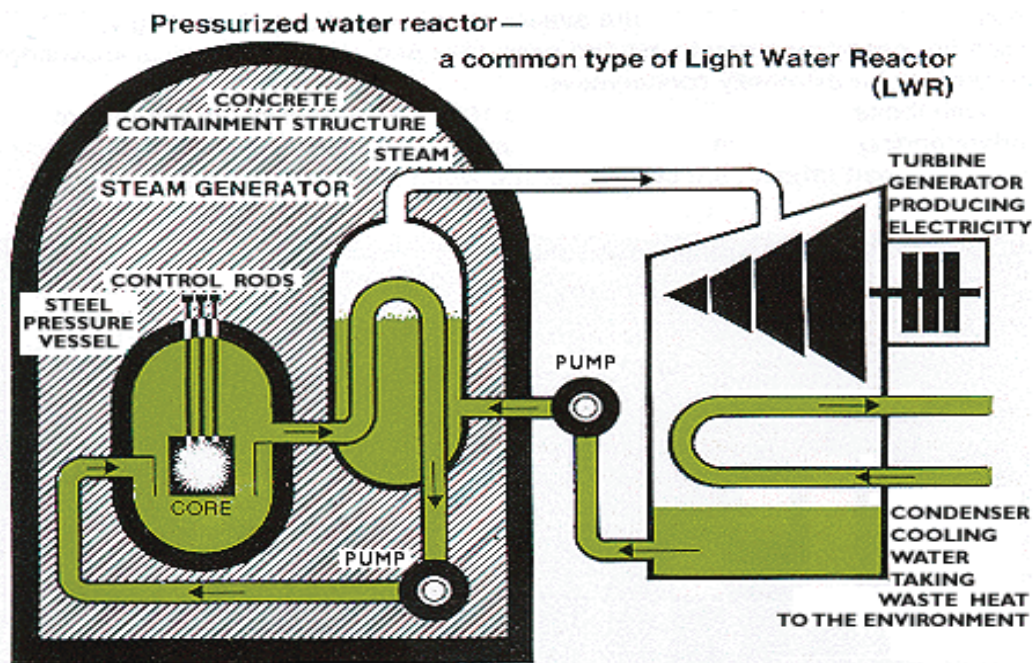


Figure 1.4-1: SIMPLIFIED DIAGRAM OF A PRESSURIZED WATER REACTOR

Nuclear Fission: fission is the splitting of atoms (e.g., uranium-235) by a neutron to release heat and more neutrons, creating a chain reaction. Radiation and fission products are by-products of the process as illustrated in Figure 1.4-2.

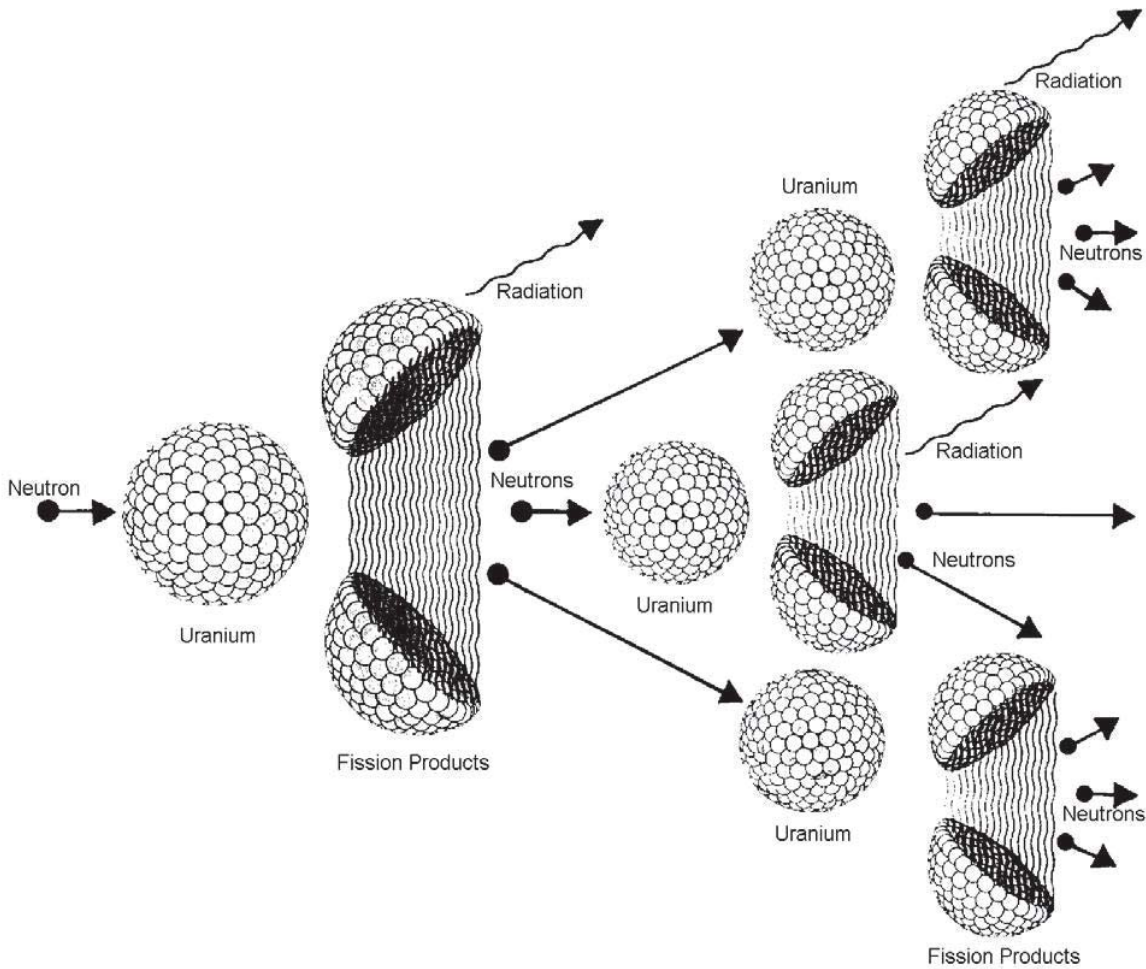


Figure 1.4-2: Radioactive Fission Product Formation

Radioactive activation products (Figure 1.4-3), on the other hand, originate from two sources. The first is by neutron bombardment of the hydrogen, oxygen and other gas (helium, argon, nitrogen) molecules in the reactor cooling water. The second is a result of the fact that the internals of any piping system or component are subject to minute yet constant corrosion from the reactor cooling water. These minute metallic particles (for example: nickel, iron, cobalt, or magnesium) are transported through the reactor core into the fuel region, where neutrons may react with the nuclei of these particles, producing radioactive products. Therefore, activation products are nothing more than ordinary naturally- occurring atoms that are made unstable or radioactive by neutron bombardment. These activation products circulate along with the reactor coolant water and will deposit on the internal surfaces of pipes and equipment. The radioactive activation products on the pipes and equipment emit radiation. Examples of some activation products are manganese-54 (Mn-54), iron-59 (Fe-59), cobalt-60 (Co-60), and zinc-65 (Zn-65).

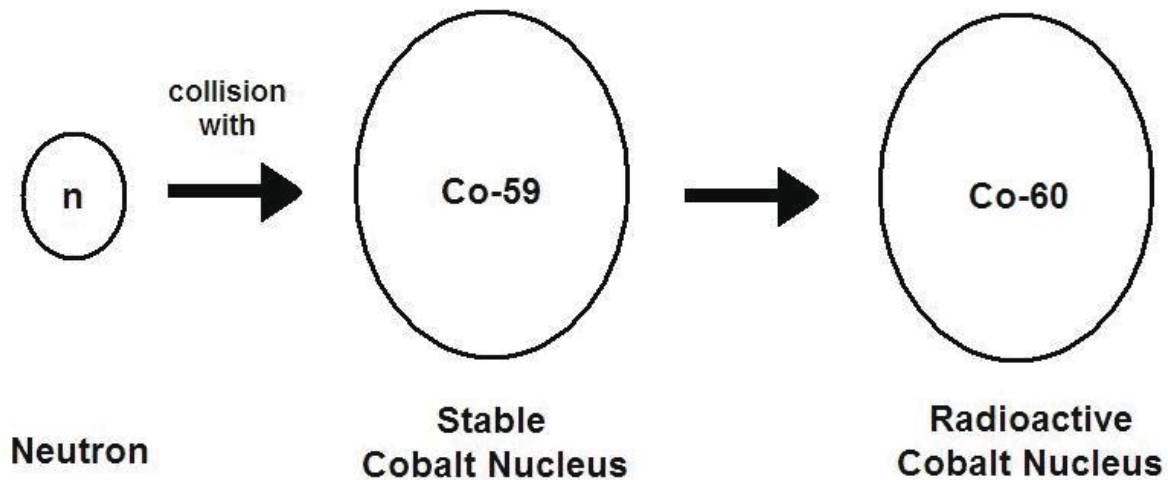


Figure 1.4-3: Radioactive Activation Product Formation

At MPS there are five independent protective barriers that confine these radioactive materials. These five barriers are:

- fuel pellets;
- fuel cladding;
- reactor vessel and associated piping and equipment;
- primary containment and,
- secondary containment (enclosure building).

The ceramic uranium fuel pellets provide the first barrier. Most of the radioactive fission products are either physically trapped or chemically bound between the uranium atoms, where they will remain. However, a few fission products that are volatile or gaseous may diffuse through the fuel pellets into small gaps between the pellets and the fuel cladding.

The second barrier, the fuel cladding, consists of zirconium alloy tubes that confine the fuel pellets. The small gaps between the fuel and the cladding contain the noble gases and volatile iodines that are types of radioactive fission products. This radioactivity can diffuse to a small extent through the fuel cladding into the reactor coolant water. Radioactivity can also escape into coolant water through cladding defects and failures.

The third barrier consists of the reactor pressure vessel, steel piping and equipment that confine the reactor cooling water. The reactor pressure vessel, which holds the reactor fuel, is typically a steel tank 40 feet high by 14 feet in diameter with walls about five to nine inches thick. These vessels and associated piping provide containment for radioactivity in the primary coolant and the reactor core. However, during the course of operations and maintenance, small amounts of radioactive fission and activation products can escape through valve leaks or upon breaching of the primary coolant system for maintenance.

The fourth barrier is the primary containment. It is a cylindrical enclosure with approximately five-foot thick steel reinforced concrete walls lined by steel on the inside. During operation the containment is closed but small amounts of radioactivity may be released from primary containment by venting during operation to maintain proper containment pressure. During maintenance and refueling outages containment is open and small amounts of radioactivity is released during this time when the fuel has been moved out of the reactor cavity in containment.

The fifth barrier is the secondary containment or enclosure building. The enclosure building is a steel building that surrounds the primary containment. This barrier is an additional safety feature at Millstone's reactor units to contain radioactivity that may escape from the primary containment. This enclosure building is equipped with a filtered ventilation system that is used when needed to reduce the radioactivity that escapes from the primary containment.

The five barriers confine most of the radioactive fission and activation products. However, small amounts of radioactivity do escape via mechanical failures and maintenance on valves, piping, and equipment associated with the reactor cooling water system. The small amounts of radioactive liquids and gases that do escape the various containment systems are further controlled by the liquid purification and ventilation filtration systems. The control of radioactive effluents at MPS will be discussed in more detail in the next section.

1.5 Radioactive Effluent Control

The small amounts of radioactive liquids and gases that might escape the first two barriers are processed in the liquid and gaseous waste treatment systems, then monitored for radioactivity, and released only if the radioactivity levels are below the federal release limits.

Radioactivity released from the liquid effluent system to the environment is limited, controlled and monitored by a variety of systems and procedures which include:

- reactor water cleanup system;
- liquid radioactive waste treatment system;
- sampling and analysis of the liquid radioactive waste tanks; and,
- liquid waste effluent discharge radioactivity monitor.

The purpose of the reactor water cleanup system is to continuously purify the reactor cooling water by removing radioactive atoms and non-radioactive impurities that may become activated by neutron bombardment. A slip stream of the reactor coolant water is diverted from the primary coolant system and is directed through ion exchange resins where radioactive elements, dissolved and suspended in the water, are removed through chemical processes. The net effect is a substantial reduction of the radioactive material that is present in the primary coolant water and consequently the amount of radioactive material that might escape from the system.

Reactor cooling water that might escape the primary cooling system and other radioactive water sources are collected in floor and equipment drains. These drains direct this radioactive liquid waste to large holdup tanks. The liquid waste collected in the tanks is purified again using the liquid radioactive waste treatment system, which consists of a filter and ion exchange resins.

Processing of liquid radioactive waste results in large reductions of radioactivity in liquids discharged into Niantic Bay. Wastes processed through liquid radioactive waste treatment can be purified and, in some cases, re-used in station systems.

Prior to release, the radioactivity in any liquid radioactive waste tank is sampled and analyzed to determine if the level of radioactivity is below the release limits and to quantify the total amount of radioactive liquid effluent that will be released. If the levels are below the federal release limits, the tank is drained to the liquid effluent discharge header.

This liquid waste effluent discharge line is provided with a shielded radioactivity monitor. This detector is connected to a radiation level meter and a recorder in the Control Room. The radiation alarm is set so that the detector will alarm before radioactivity levels exceed the release limits. In addition to the alarm function, the radiation monitor also signals both discharge valves to close thus terminating the discharge release to the environment. Gamma spectroscopy analysis, tritium analysis and the effluent radiation monitors prevent any liquid radioactivity from being released in excess of release rate and total activity limits. An audible alarm notifies the Control Room operator that this has occurred.

Some liquid waste sources, which have a low potential for containing radioactivity, and/or may contain very low levels of contamination, may be discharged directly to the environment. One such source of liquid is the turbine building sump. However, periodic representative samples are collected for analysis of radioactivity content to track the amounts of radioactivity being discharged.

The preceding discussion illustrates that many controls exist to reduce the radioactive liquid effluents released to the environment to as far below the release limits as is reasonably achievable.

Radioactive releases from the radioactive gaseous effluent system to the environment are limited, controlled, and monitored by a variety of systems and procedures which include:

- containment building ventilation system;
- containment building radioactivity monitors;
- sampling and analysis of containment building vent and purge effluents;
- process gas treatment system;
- auxiliary building (and engineered safeguards and fuel building for MPS3) ventilation system;
- MPS stack and units' vent effluent radioactivity monitors;
- sampling and analysis of MPS stack and units' vent effluents;
- process radiation monitors; and
- steam jet air ejector (SJAЕ) monitor

The primary sources of gaseous radioactive waste are degassing of the primary coolant, gaseous liquid drains, and gaseous vents. Additional sources of gaseous waste activity include ventilation air released from the auxiliary building and purging and venting of the containment building. The radiation level meter and recorders for the effluent radioactivity monitors are located in the Control Room. The station process computer aids in tracking the monitor readings. To supplement the information continuously provided by the detector, air samples are taken periodically from the units' containments, MPS stack and units' vents. These samples are analyzed to quantify the total amount of radioactive gases, radioactive iodines, radioactive particulate, and tritium released in gaseous effluents.

Gases from the primary coolant are held up in waste gas decay tanks for decay at MPS2. Gaseous waste at MPS3 is purified through a process gas system, consisting of high-efficiency particulate air filters and charcoal absorber beds. Gases from periodic venting of the MPS2 containment are released through a similar process system (Enclosure Building Filtration System) while gases from the MPS3 containment vacuum pumps are released without treatment. If necessary, MPS3 containment air can be filtered by an internal particulate and charcoal treatment system. Containment purges (purge is the forced ventilation process while containment vents are pressure releases) for MPS2 are filtered by high-efficiency particulate filters while at MPS3 these are not normally filtered. If necessary, particulate and charcoal filters can be used for these purges.

Normally, for MPS2, the air released from the unit vent is from the ventilation of the auxiliary (which includes the fuel pool), service and enclosure buildings. For MPS2, fuel pool and enclosure building ventilation can be redirected to the MPS Site Stack. Normally, for MPS3, the air released from the unit vent is from the ventilation of the auxiliary, fuel, service, waste disposal and enclosure buildings. For MPS3, enclosure building ventilation can be redirected to the MPS Site Stack.

Therefore, for both liquid and gaseous releases, radioactive effluent control systems exist to collect and purify the radioactive effluents in order to reduce releases to the environment to as low as is reasonably achievable. The effluents are always monitored, sampled and analyzed to make sure that radioactivity levels are below the release limits. If the release limits are being approached, isolation valves are closed to stop the release and ensure that federal regulatory limits are always met.

1.6 Radiological Impact on Humans

The final step in the effluent control process is the determination of the radiological dose impact to humans and comparison with the federal dose limits to the public. As mentioned previously, the purpose of continuous radiation monitoring and periodic sampling and analysis is to measure the quantities of radioactivity being released to determine compliance with the radioactivity release limits. This is the first stage for assessing releases to the environment.

The second stage is calculation of the dose impact to the general public from MPS's radioactive effluents. The purpose of this calculation is to periodically assess the dose to the general public resulting from radioactive effluents to ensure that the dose is being maintained as far below the federal dose limit as is reasonably achievable. This is the second stage for assessing releases to the environment.

The types and quantities of radioactive liquid and gaseous effluents released from MPS during each year are reported to the NRC annually in the Radiological Effluent Release Report (RERR). Similar to this report, the RERR is submitted annually to the NRC. The liquid and gaseous effluents were well below the federal release limits and were a small percentage of the MPS REMODCM effluent control limits.

The measurements of the physical and chemical nature of the effluents are used to determine how the radionuclides will interact with the environment and how they can result in radiation exposure to humans. The environmental interaction mechanisms depend upon factors such as the hydrological (water) and meteorological (atmospheric) characteristics in the area. Information on the water flow, wind speed, wind direction, and atmospheric mixing characteristics are used to estimate how radioactivity will distribute and disperse in the ocean and the atmosphere.

The most important type of information that is used to evaluate the radiological impact on humans is data on the use of the environment. Information on fish and shellfish consumption, boating usage, beach usage, locations of cows and goats, locations of residences, locations of gardens, and other usage information are utilized to estimate the amount of radiation and radioactivity received by the general public.

The radiation exposure pathway to humans is the path radioactivity takes from its release point at MPS to its effect on man. The movement of radioactivity through the environment and its transport to humans is portrayed in Figure 1.6-1.

EXAMPLES OF Millstone's RADIATION EXPOSURE PATHWAYS

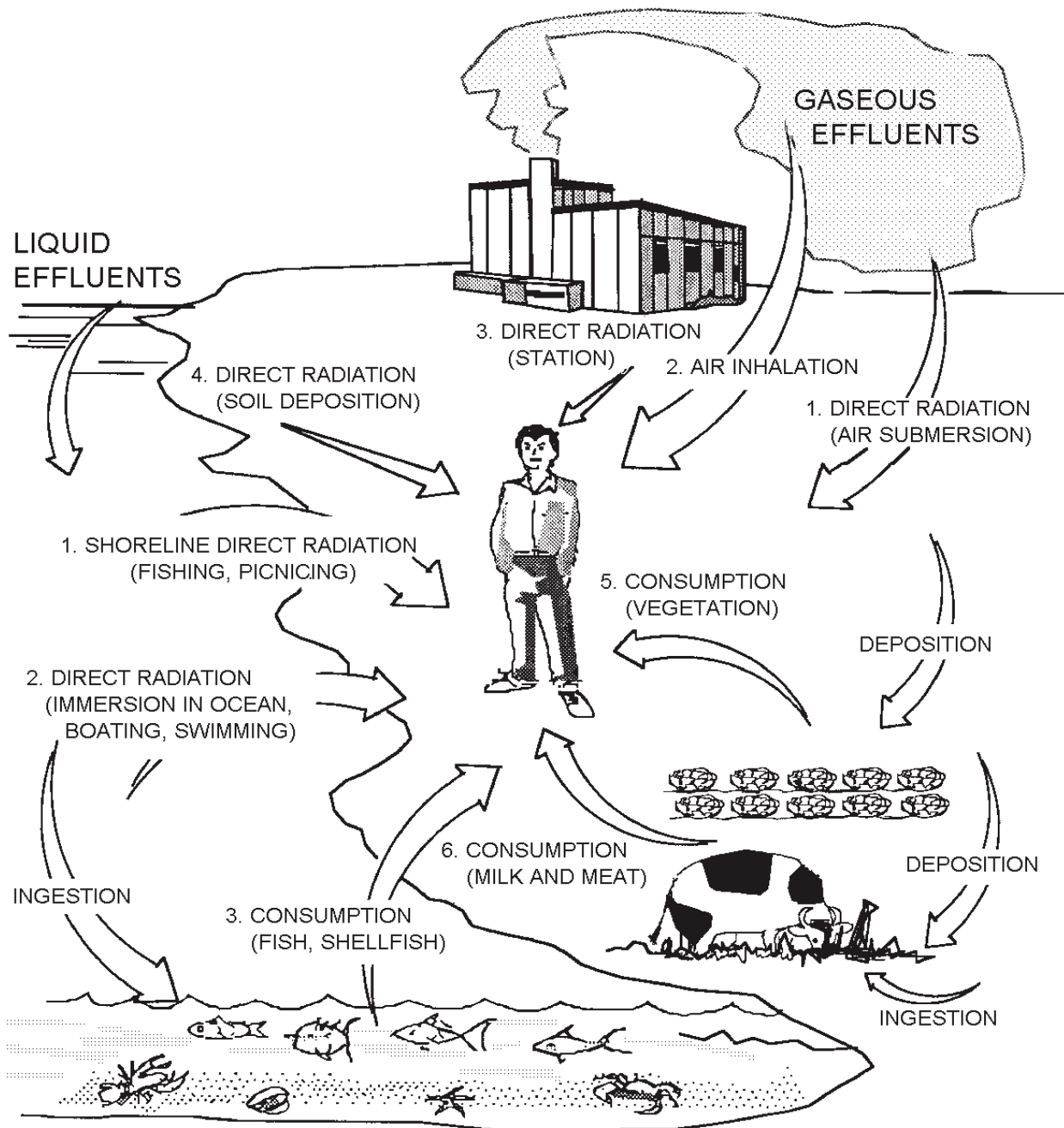


Figure 1.6-1: Radiation Exposure Pathways

There are four pathways in which liquid effluents affect humans:

- external radiation from liquid effluents that deposits and accumulates on the shoreline;
- external radiation during boating from radioactivity in ocean water;
- external radiation from immersion in ocean water containing radioactivity; and,
- internal radiation from consumption of fish and shellfish containing radioactivity absorbed from the liquid effluents.

There are six major pathways in which gaseous effluents affect humans:

- external radiation from immersion in an airborne plume of radioactivity;
- external radiation from shine from an overhead, airborne plume of radioactivity;
- internal radiation from inhalation of airborne radioactivity;
- external radiation from deposition of radioactive effluents on the ground;
- internal radiation from consumption of vegetation containing radioactivity deposited on the vegetation from airborne deposition and absorbed from the soil due to ground deposition of radioactive effluents; and,
- internal radiation from consumption of milk and meat containing radioactivity deposited on forage that is eaten by cattle and other livestock.

Drinking water is not a pathway of exposure for radioactivity released in liquid or gaseous effluents from Millstone. All liquid effluents are released to either Long Island Sound or Niantic Bay. Both are salt water bodies which are not used as sources of drinking water. The closest reservoir is Lake Konomoc, 6.5 miles from Millstone. Radioactivity deposited in the reservoir from MPS gaseous effluents would not yield a significant dose to the public compared to doses from the six major pathways listed.

Ambient (direct) radiation emitted from sources of radioactivity at MPS comes from low-level radioactive waste being processed and stored at the site prior to shipping and disposal. Also, the operation of the Independent Spent Fuel Storage Installation (ISFSI) which began in 2005 results in a small amount of direct radiation at the site boundary.

The radiological dose impact on humans is based both on effluent analyses and modeling and on direct measurements of radiation and radioactivity in the environment. However, the operation of MPS results in releases of only small amounts of radioactivity, and, as a result of dilution in the atmosphere and ocean, even the most sensitive radioactivity measurement and analysis techniques cannot usually detect these tiny amounts of radioactivity above that which is naturally present in the environment. Therefore, radiation doses are calculated using radioactive effluent release data and computerized dose calculations that are based on conservative NRC-recommended models that tend to result in over-estimates of the resulting dose. These computerized dose calculations are performed by DENC personnel. These computer codes use the guidelines and methodology set forth by the NRC in Regulatory Guide 1.109 (Reference 7). The dose calculations are specified in the Millstone's REMODCM (Reference 8), which has been reviewed by the NRC.

It should be emphasized that the conservative assumptions made in the computer code calculations; the maximum hypothetical dose to an individual is considerably higher than the dose that would actually be received by a real individual.

After dose calculations are performed, the results are compared to the dose limits for the public as specified in NRC's technical specifications for MPS (References 9-11).

The technical specifications limits for the dose to a member of the general public from radioactive material in liquid effluents released to unrestricted areas are:

- less than or equal to 3 mrem per year to the total body; and,
- less than or equal to 10 mrem per year to any organ.

The technical specifications limits for dose due to release of radioactivity in gaseous effluents is restricted to:

- less than or equal to 10 mrad per year for gamma radiation from noble gases,
- less than or equal to 20 mrad per year for beta radiation from noble gases and
- less than or equal to 15 mrem per year to any organ from iodine-131, iodine-133, tritium, and all particulate radionuclides with half-lives greater than 8 days.

The Technical Specifications limits for total dose from all three MPS units due to release of radioactivity in gaseous and liquid effluents and direct radiation is restricted to:

- less than or equal to 25 mrem per year to the total body;
- less than or equal to 75 mrem per year to the thyroid; and,
- less than or equal to 25 mrem per year to any other organ.

2. PROGRAM DESCRIPTION

2.1 Sampling Schedule and Locations

The sample locations, types, and frequency of analysis are given in Tables 2.1-1 and 2.1-2 and are shown in Figures 2.1-1 and 2.1-2. The program as described in Table 2.1-1 lists the required samples collected as specified in the REMODCM, as well as, any other extra samples collected under the program.

Table 2.1-1 Environmental Monitoring Program Sampling Types and Locations

No.- Type*	Location Name	Distance, Direction From Release Point**	Sample Media
1-I	Onsite – NAP Parking Lot N	0.6 Mi, NNW	TLD, Air Particulate, Iodine, Vegetation
2-I	Onsite - Weather Shack	0.3 Mi, S	TLD, Air Particulate, Iodine
3-I	Onsite - Bird Sanctuary	0.3 Mi, NE	TLD, Air Particulate, Iodine, Soil
4-I	Onsite - Albacore Drive	1.0 Mi, N	TLD, Air Particulate, Iodine, Soil
5-I	Onsite – Quarry East	0.1 Mi, SSE	TLD
6-I	Onsite - Quarry Discharge	0.3 Mi, SSE	TLD
7-I	Onsite – Env. Lab Dock	0.3 Mi, SE	TLD
8-I	Onsite – Env. Lab	0.3 Mi, SE	TLD
9-I	Onsite - Bay Point Beach	0.4 Mi, W	TLD
10-I	Goshen Fire Dept.	1.2 Mi, E	TLD, Air Particulate, Iodine, Vegetation
11-I	Great Neck Country Club	1.6 Mi, ENE	TLD, Air Particulate, Iodine
13-C	Mystic, CT	11.5 Mi, ENE	TLD
14-C	Ledyard, CT	12.0 Mi, NE	TLD, Soil
15-C	Norwich, CT	14.0 Mi, N	TLD, Air Particulate, Iodine
16-C	Old Lyme, CT – Halls Rd.	8.8 Mi, W	TLD
17-I	Site Boundary	0.5 Mi, NE	Vegetation
25-I,	Fruits & Vegetables	< 10 Miles	Vegetation
26-C,	Fruits & Vegetables	> 10 Miles	Vegetation
27-I	East Lyme Police Dept.	1.7 Mi, WNW	TLD, Air Particulate, Iodine
28-I	Two Tree Island ¹	0.8 Mi, SSE	Fish ¹
29-I	West Jordan Cove ¹	≤ 0.5 Mi, ENE to ESE	Clams, Fucus, Fish ¹
31-I	Niantic Shoals	1.8 Mi, NW	Bottom Sediment, Clams
32-I	Vicinity of Discharge ^{1,2}		Bottom Sediment, Fish ¹ , Seawater, Aquatic Flora
33-I	Seaside Point	1.8 Mi, ESE	Bottom Sediment
34-I	Thames River Yacht Club	4.0 Mi, ENE	Bottom Sediment
35-I	Niantic Bay	≤0.5 Mi, SSW to W	Lobster, Fish ¹ , Aquatic Flora
36-C	Black Point	2.7 Mi, WSW	Aquatic Flora
37-C	Giant's Neck	3.5 Mi, WSW	Bottom Sediment, Seawater
41-I	Waterford - Myrock Avenue	3.2 Mi, ENE	TLD
42-I	East Lyme - Billow Road	2.4 Mi, WSW	TLD
43-I	East Lyme–Old Black Point	2.6 Mi, SW	TLD
44-I	Onsite – Schoolhouse	0.1 Mi, NNE	TLD
45-I	Onsite - Access Road #1	0.5 Mi, NNW	TLD
46-I	Old Lyme - Hillcrest Ave.	4.6 Mi, WSW	TLD
47-I	East Lyme - W. Main St.	4.5 Mi, W	TLD
48-I	East Lyme – Corey&Roxbury	3.4 Mi, WNW	TLD
49-I	East Lyme - Society Rd.	3.6 Mi, NW	TLD
50-I	East Lyme – Manwaring Rd & Terrace Ave	2.1 Mi, W	TLD
51-I	East Lyme - Smith Ave.	1.5 Mi, NW	TLD
52-I	Waterford - River Rd.	1.1 Mi, NNW	TLD
53-I	Waterford - Gardiners Wood	1.4 Mi, NNE	TLD
55-I	Waterford - Magonk Point	1.8 Mi, ESE	TLD
56-I	New London – Ocean&Mott	3.7 Mi, E	TLD

1. Fish required to be sampled from one of three other locations (#28, #29 or #32).

2. Vicinity of discharge includes the Quarry and shoreline area from Fox Island to western point of Red Barn recreation Area and Offshore out to 500 feet.

Footnotes:

*1 = Indicator; C = Control, X - Extra - sample not required by the REMODCM

** = The release points are the Millstone Stack for terrestrial location and the end of the quarry for aquatic location.

Table 2.1-1 Environmental Monitoring Program Sampling Types and Locations
(Continues)

No.- Type ¹	Location Name	Distance, Direction From Release Point ²	Sample Media
57-I	New London - Ocean Ave.	3.6 Mi, ENE	TLD
59-I	Waterford -Miner Ave.	3.4 Mi, NNE	TLD
60-I	Waterford-Parkway South&Cross	4.0 Mi, N	TLD
61-I	Waterford–Oil Mill&Boston Post	4.3 Mi, NNW	TLD
62-I	East Lyme - Columbus Ave.	1.9 Mi, WNW	TLD
63-I	Waterford - Gardiners Wood & Jordon Cove	0.8 Mi, NE	TLD
64-I	Waterford - Shore Rd.	1.1 Mi, ENE	TLD
65-I	Waterford – Boston Post Rd.	3.2 Mi, NE	TLD
66-X	NAP Parking Lot - Fit Center	0.4 Mi, NW	TLD
71-I	1-MW-XFMR-03	Onsite	Well Water
72-I	MW-GPI-1	Onsite	Well Water
73-X	Site Switchyard Fence	0.3 Mi, N	TLD
74-X	Ball Field Foul Pole	0.6 Mi, N	TLD
75-X	Waterford – Windward Way & Shotgun	0.5 Mi, NE	TLD
76-X	ISFSI-1	Up-gradient of ISFSI	Well Water
77-X	ISFSI-2	Down-gradient of ISFSI	Well Water
78-X	ISFSI-3	Down-gradient of ISFSI	Well Water
79-I	M3-MW-1	Onsite	Well Water
81-I	S2-MW-1	Onsite	Well Water
82-I	MW-6B	Onsite	Well Water
83-I	S3-MW-2	Onsite	Well Water
89-C	Aquatic background	>4 miles of discharge	Lobster

1. Fish required to be sampled from one of three other locations (#28, #29 or #32).

2. Vicinity of discharge includes the Quarry and shoreline area from Fox Island to western point of Red Barn recreation Area and Offshore out to 500 feet.

Footnotes:

*I = Indicator; C = Control, X - Extra - sample not required by the REMODCM

** = The release points are the Millstone Stack for terrestrial location and the end of the quarry for aquatic location.

Table 2.1-2 Required Sampling Frequency & Type of Analysis

	Exposure Pathway and/or Sample	No. of Locations	Sampling & Collection Frequency	Type of Analysis
1.	Gamma Dose - Environmental TLD	39 ¹	Quarterly	Gamma Dose - Quarterly
2.	Airborne Particulate	8	Continuous sampler - filter change every two weeks	Gross Beta – Every two weeks Gamma Spectrum - Quarterly on composite (by location), and on individual sample if gross beta is greater than 10 times the mean of the weekly control station's gross beta results
3.	Airborne Iodine	8	Continuous sampler – canister change every two weeks	I-131 – Every two weeks
4.	Vegetation	5	One sample near middle and one near end of growing season	Gamma Isotopic on each sample
5.	Reserved			
6.	Sea Water	2	Continuous sampler with a monthly collection at indicator location. Quarterly at control location - Composite of 6 weekly grab samples.	Gamma Isotopic and Tritium on each sample.
7.	Well Water	6	Semiannual	Gamma Isotopic and Tritium on each sample
8.	Bottom Sediment	5	Semiannual	Gamma Isotopic on each sample
9.	Soil	3	Annually	Gamma Isotopic on each sample
10.	Fin Fish (edible portion)	2	Semiannual	Gamma Isotopic on each sample
11.	Aquatic flora (fucus)	4	Quarterly	Gamma isotopic on each sample
13.	Clams (edible portion)	2	Semiannual	Gamma Isotopic on each sample
14.	Lobster (edible portion)	2	Semiannual	Gamma Isotopic on each sample

Footnotes

1. Two or more TLDs or TLD with two or more elements per location.

- Oysters were previously Sample#12, REMODCM revision 27.

Figure 2.1-1. “Inner TLD, Air, Grass, Soil, and Aquatic Locations”

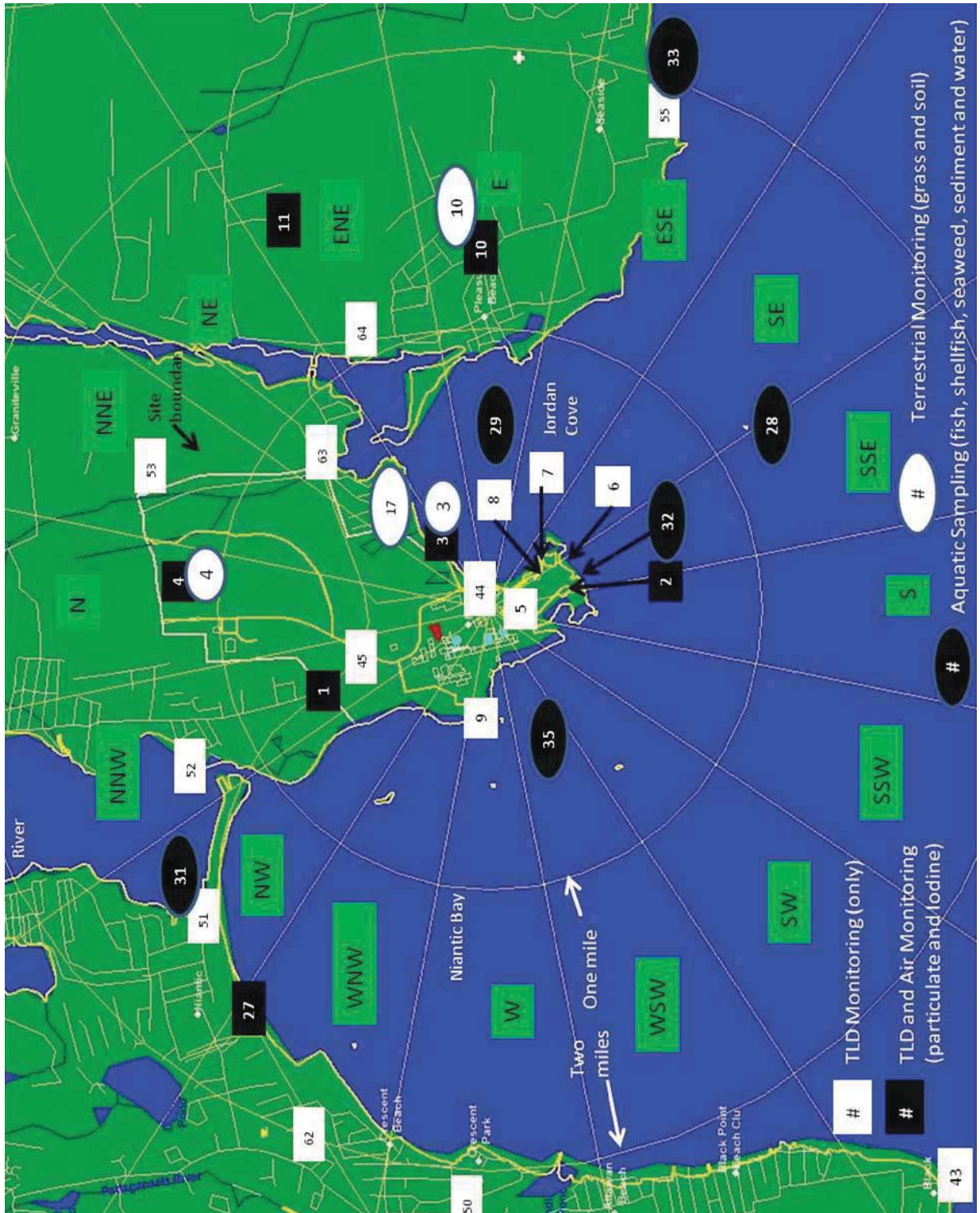
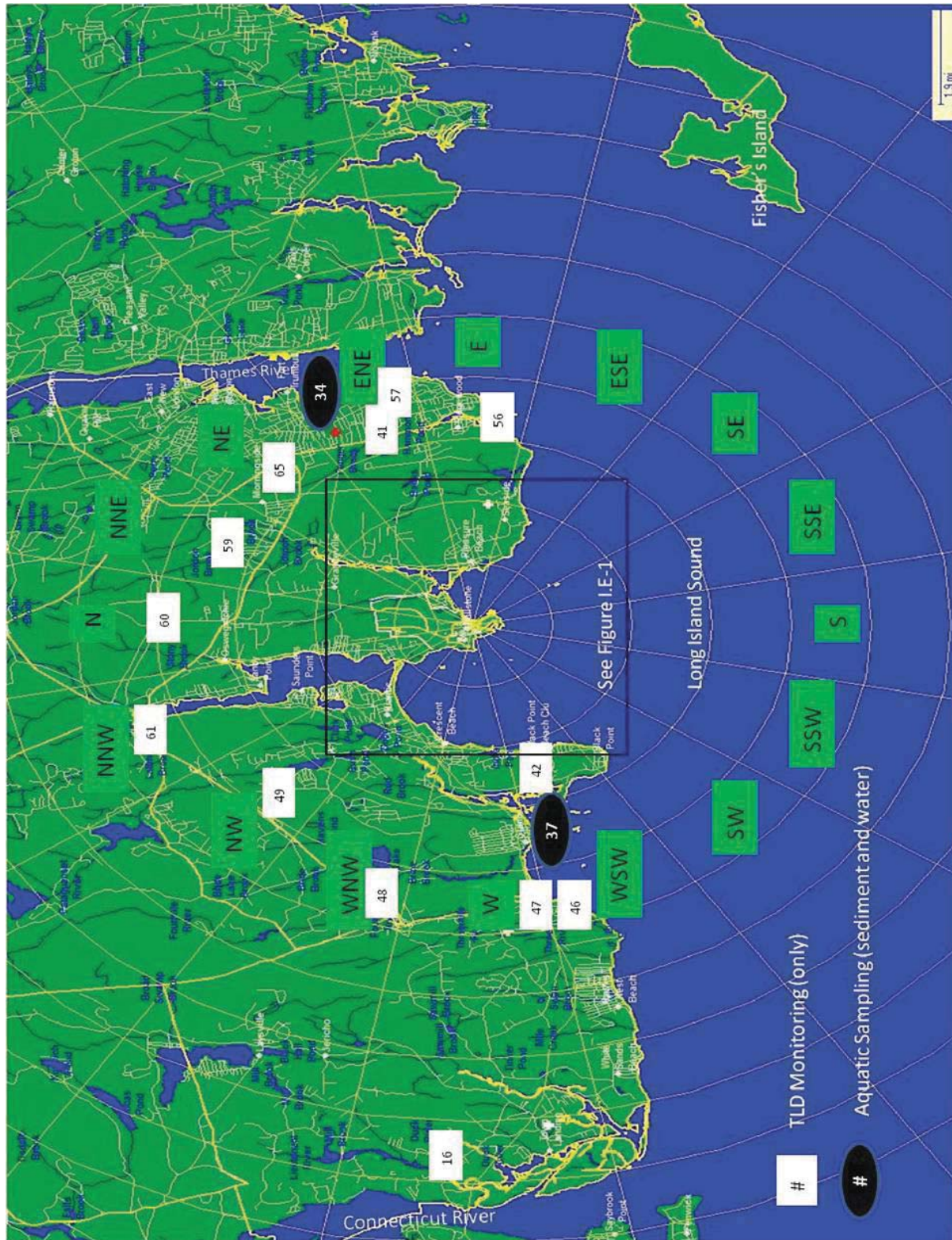


Figure 2.1-2. “Outer TLD and Aquatic Locations”



2.2 Samples Collected During Report Period

The following table summarizes the number of samples of each type collected and analyzed during 2019:

Table 2.2-1 REMP Samples Collected in 2019

Sample Type	Number of Technical Specification Required Samples	Number of Technical Specification Required Samples Analyzed	Number of Extra Samples Analyzed
Gamma Exposure (Environmental TLD)	156	156	16
Air Particulates	216	216	0
Air Iodine	216	216	0
Soil	3	3	0
Milk (cow)	0	0	0
Milk (goat)	0	0	0
Well Water	12	12	24
Vegetation	10	10	7
Sea Water	16	16	0
Bottom Sediment	10	10	0
Aquatic Flora	16	16	0
Fish	4	4	0
Oysters	0	0	4
Clams	4	4	0
Lobster	4	4	0
Total All Types	667	667	51

2.3 Required Samples Not Collected During the Report Period

During 2019 all required samples were obtained as listed in Table 2.2-1.

Prior to 2018, milk sampling was performed as an extra sample. The 2019 Land Use Census did not locate any milk farms producers within ten miles of Millstone Power Station. As a substitute for milk samples, strontium analysis of air samples and gamma analysis of broad leaf vegetation were performed.

3. RADIOCHEMICAL RESULTS

3.1 Summary Table

In accordance with the REMODCM, Section I.F.1, a summary table of the radiochemical results has been prepared and is presented on the following pages. The mean and range recorded are based only upon detectable measurements.

A more detailed analysis of the data is given in Section 4.0 where a discussion of the variations in the data explains many aspects that are not evident in the Summary Table because of the basic limitation of data summaries. The data summaries include the extra ("X") samples collected throughout the year. These samples are taken to enhance the monitoring program or replace samples from required locations when they are not available.

Furthermore, in accordance with the REMODCM, Section I.E.3, an inter-laboratory comparison was performed by Teledyne Brown Engineering Environmental Services (TBE-ES) as part of their quality assurance program for environmental monitoring in order to demonstrate that the results are reasonably valid (Appendix B). Quality Control of radioanalyses involves TBE-ES internal process control program and independent third party programs administered by Analytics and Environmental Resource Associates (ERA) and Department of Energy's (DOE) Mixed Analyte Performance Evaluation Program (MAPEP).

The Teledyne inter-laboratory comparison report concluded that 119 out of 129 quality assurance analyses performed met the specified acceptance criteria. Ten analyses did not meet the specified acceptance criteria addressed in Teledyne Non-Conformance Reports (NCRs), listed in Appendix B. A review of the Teledyne NCRs was performed and none of the ten analysis failures were found to adversely affect any of Millstone samples results and data accuracy.

**RADIOLOGICAL ENVIRONMENT MONITORING PROGRAM SUMMARY
MILLSTONE POWER STATION
Dockets 50-245, 50-336 & 50-423 2019**

Medium or Pathway Sampled (Units)	Analysis Type	Total Number	LLD*	Indicator Locations	Location with Highest Mean			Control Locations
				Number Mean (Range)	Location Number	Distance Direction	Number Mean (Range)	Number Mean (Range)
Direct Radiation <i>TLD (uR/hr)</i>	Gamma Dose	172	NA	156	9	0.04 Mi. W	4	16
				7.7 (4.5-11.3)			11.2 (11.1-11.3)	7.9 (5.7-9.5)
Air Iodine <i>(pCi/m³)</i>	I-131	216	0.07	189 <LLD	NA	NA	<LLD	27 <LLD
Air Particulate <i>(pCi/m³)</i>	GR-B	216	0.01	189 0.012 (0.007-0.017)	10	1.2 Mi. E	27 0.012 (0.008-0.017)	27 0.012 (0.007-0.017)
	SR-89	32	0.1	28 <LLD	NA	NA	<LLD	4 <LLD
	SR-90	32	0.01	28 <LLD	NA	NA	<LLD	4 <LLD
	GAMMA BE-7	32	NA	28 0.1124 (0.0731-0.1657)	3	0.3 Mi. NE	4 0.1254 (0.0744-0.1657)	4 0.1035 (0.0819-0.1269)
	Other Gammas		Note 2	<LLD	NA	NA	<LLD	<LLD
Soil <i>(pCi/g dry)</i>	GAMMA K-40	3	NA	2 13.295 (13.200-13.390)	14	12.0 Mi. NE	1 14.900 (<LLD-14.900)	1 14.900 (<LLD-14.900)
	CS-137		0.18	2 0.250 (0.189-0.312)	4	1.0 Mi. N	1 0.312 (<LLD-0.312)	1 0.154 (<LLD-0.154)
	Other Gammas		Note 3	<LLD	NA	NA	<LLD	<LLD
Cow Milk <i>(pCi/l)</i>	SR-89		10					
	SR-90		2					
	GAMMA K-40		NA					Milk was not available for collection in 2019, as a substitute, Strontium Analysis of Air Particulate filters was performed
	Other Gammas		Note 4					

**RADIOLOGICAL ENVIRONMENT MONITORING PROGRAM SUMMARY
MILLSTONE POWER STATION
Dockets 50-245, 50-336 & 50-423 2019**

Medium or Pathway Sampled (Units)	Analysis Type	Total Number	LLD*	Indicator Locations	Location with Highest Mean			Control Locations
				Number Mean (Range)	Location Number	Distance Direction	Number Mean (Range)	Number Mean (Range)
Goat Milk (pCi/l)	SR-89		10					
	SR-90		2					
	GAMMA K-40		NA		Milk was not available for collection in 2019, as a substitute, Strontium Analysis of Air Particulate filters was performed			
	Other Gammas		Note 4					
Well Water (pCi/l)	H-3	36	2000	36 <LLD	NA	NA	<LLD	NA
	GAMMA K-40	36	NA	36 <LLD	NA	NA	<LLD	NA
	Other Gammas		Note 5	<LLD	NA	NA	<LLD	NA
Fruits & Vegetables (pCi/g wet)	GAMMA Be-7	9	NA	1 0.928 (<LLD-0.928)	25	Within 10 Miles	1 0.928 (<LLD-0.928)	4 <LLD
	K-40		NA	5 2.498 (1.032-5.523)	25	Within 10 Miles	5 2.498 (1.032-5.523)	4 1.655 (0.584-02.341)
	Other Gammas		Note 6	<LLD	NA	NA	<LLD	<LLD
Broad Leaf Vegetation (pCi/g wet)	GAMMA BE-7	8	NA	6 1.340 (0.571-2.726)	1	0.6 Mi. NNW	2 1.888 (1.050-2.726)	2 1.173 (0.609-1.738)
	K-40		NA	6 3.981 (3.109-4.587)	26	>10 miles	2 4.449 (3.147-5.751)	2 4.449 (3.147-5.751)
	Other Gammas		Note 7	<LLD	NA	NA	<LLD	<LLD

**RADIOLOGICAL ENVIRONMENT MONITORING PROGRAM SUMMARY
MILLSTONE POWER STATION
Dockets 50-245, 50-336 & 50-423 2019**

Medium or Pathway Sampled (Units)	Analysis Type	Total Number	LLD*	Indicator Locations	Location with Highest Mean			Control Locations
				Number Mean (Range)	Location Number	Distance Direction	Number Mean (Range)	Number Mean (Range)
Sea Water (pCi/l)	H-3	16	3000	11 1102 (402-4780)	32	< 0.1 Mi	11 1102 (402-4780)	4 <LLD
	GAMMA K-40	16	NA	11 322 (229-408)	32	< 0.1 Mi	11 322 (229-408)	3 256 (183-300)
	Other Gammas		Note 5	<LLD	NA	NA	<LLD	<LLD
Bottom Sediment (pCi/g dry)	GAMMA K-40	10	NA	8 14.65 (12.03-19.49)	31	1.8 Mi. NW	2 15.95 (14.35-17.54)	2 14.21 (13.74-14.68)
	Ac-228			8 <LLD	37C	3.5 Mi. WSW	1 1.112 (<LLD-1.112)	1 1.112 (<LLD-1.112)
	Other Gammas		Note 3	<LLD	NA	NA	<LLD	<LLD
Flora (pCi/g wet)	GAMMA BE-7	16	NA	3 0.3208 (0.3133-0.3347)	36	2.7 Mi. WSW	2 0.3635 (0.2867-0.4402)	2 0.3635 (0.2867-0.4402)
	K-40		NA	12 6.5823 (4.8820-9.3060)	32	< 0.1 Mi	4 7.65 (6.2440-9.3060)	4 6.1343 (5.1410-6.7950)
	I-131		0.06	12 <LLD	NA	NA	<LLD	4 <LLD
	Other Gammas		Note 6	<LLD	NA	NA	<LLD	<LLD

**RADIOLOGICAL ENVIRONMENT MONITORING PROGRAM SUMMARY
MILLSTONE POWER STATION
Dockets 50-245, 50-336 & 50-423 2019**

Medium or Pathway Sampled (Units)	Analysis Type	Total Number	LLD	Indicator Locations	Location with Highest Mean			Control Locations
				Number Mean (Range)	Location Number	Distance Direction	Number Mean (Range)	Number Mean (Range)
Fish - Other (pCi/g wet)	GAMMA K-40	4	NA	4 3.342 (2.647-4.737)	32	< 0.1 Mi	2 3.831 (2.924-4.737)	NA
	Other Gammas		Note 9	<LLD	NA	NA	<LLD	NA
Oysters (pCi/g wet)	GAMMA K-40	4	NA	2 2.432 (2.288-2.575)	31	1.8 Mi. NW	2 2.432 (2.288-2.575)	2 2.21 (1.834-2.585)
	Other Gammas		Note 9	<LLD	NA	NA	<LLD	<LLD
Clams (pCi/g wet)	GAMMA K-40	4	NA	3/4 1.61 (1.539-1.718)	29	≤ 0.5 Mi. ENE to ESE	2 1.629 (1.539-1.718)	NA
	Other Gammas		Note 9	<LLD	NA	NA	<LLD	NA
Lobster (pCi/g wet)	GAMMA K-40	4	NA	2 2.657 (2.435-2.879)	89	>4.0 miles of discharge	2 2.782 (2.446-3.117)	2 2.782 (2.446-3.117)
	Other Gammas		Note 9	<LLD	NA	NA	<LLD	<LLD

NOTES FOR SUMMARY TABLE

- 1 - The required LLD is the smallest concentration of radioactivity that will be detected with 95% confidence that the activity is real. See detailed discussion below.
- 2 - LLDs for air particulate gamma are 0.05 pCi/M3 for Cs-134 and 0.06 pCi/M3 for Cs-137.
- 3 - LLD for soil and sediment gamma is 0.15 pCi/g for Cs-134.
- 4 - LLDs for milk gamma are 1 pCi/l for I-131, 15 pCi/l for Cs-134, 18 pCi/l for Cs-137, 70 pCi/l for Ba-140 and 25 pCi/l for La-140.
- 5 - LLDs for water gamma are 15 pCi/l for Mn-54, Co-58, Co-60, Nb-95, I-131, Cs-134 and La-140; 30 pCi/l for Fe-59, Zn-65 and Zr-95; 18 pCi/l for Cs-137 and 60 pCi/l for Ba-140.
- 6 - LLDs for fruits & vegetables, broadleaf vegetation and aquatic flora for gamma are 0.06 pCi/M3 for I-131, 0.06 pCi/M3 for Cs-134 and 0.08 pCi/M3 for Cs-137.
- 7 - LLDs for other gamma are 0.06 pCi/g for Cs-134 and I-131.
- 8 - LLDs for fish and shellfish for gammas are 0.13 pCi/g for Mn-54, Co-58, Co-60 and Cs-134; 0.26 pCi/g for Fe-59 and Zn-65; and 0.15 pCi/g for Cs-137.

Discussion of LLD

The LLD at a confidence level of 95% is the smallest concentration of radioactive material in a sample that will be detected with a 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system (which may include radiochemical separation):

$$LLD = \frac{4.66 S_b}{E * V * 2.22 * Y * \exp(-\lambda \Delta t)}$$

- LLD is the lower limit of detection as defined above (as pCi per unit mass or volume)
- S_b is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (as counts per minute)
- E is the counting efficiency (as counts per transformation)
- V is the sample size (in units of mass or volume)
- 2.22 is the number of transformation per minute per picoCurie
- Y is the fractional radiochemical yield (when applicable)
- λ is the radioactive decay constant for the particular radionuclide
- Δt is the elapsed time between sample collection (or end of the sample collection period) and time of counting

The LLD is defined as "a priori" (before the fact) limit representing the capability of a measurement system and not an "a posteriori" (after the fact) limit for a particular measurement.

Analyses were performed in such a manner that the stated LLDs were achieved under routine conditions. Occasionally background fluctuations, unavoidably small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may have rendered these a priori LLDs unachievable. In such cases, the contributing factors are identified and described in this report. As shown in the equation above, for composite samples taken over a period of time, the LLD is decayed to the end of the sample period.

3.2 Data Tables

The data reported in this section are results of analyses on all samples. All gamma exposure rates (Table 1) and air beta results (Table 2) are positive because of natural radioactivity. For all other results positive results are shown as bolded type. Results are considered positive when the measured value exceeds 1.5 times the listed 2σ error (i.e., the measured value exceeds 3σ). The reported error is two times the standard deviation (2σ) of the net activity. Unless otherwise noted, the overall error (counting, sample size, chemistry, errors, etc.) is estimated to be 2 to 5 times that listed. Because of counting statistics, negative values, zeros and numbers below the Minimum Detectable Level (MDL) are statistically valid pieces of data. For the purposes of this report, in order to indicate any background biases, all the valid data are presented. This practice was recommended by Health and Safety Laboratory (HASL) ("Reporting of Analytical Results from HASL," letter by Leo B. Higginbotham), NUREG 0475 and NUREG/CR-4007 (Sept. 1984).

Data are given according to sample type as indicated below.

1. Gamma Exposure Rate
2. Air Particulates, Gross Beta Radioactivity
3. Air Particulates, Airborne I-131
4. Air Particulates, Gamma Spectra
5. Soil
6. Milk
7. Well Water
8. Fruits & Vegetables
9. Broad Leaf Vegetation
10. Seawater
11. Bottom Sediment
12. Aquatic Flora (Fucus)
13. Fin Fish
14. Oysters
15. Clams
16. Lobster

TABLE 1
QUARTERLY
GAMMA EXPOSURE RATE
(uR/hr)*

PERIOD	1	2	3	4	5	6	7	8	9	10	11
1Q	7.6 0.7	11.1 0.7	7.3 0.5	7.6 0.5	8.8 0.8	8.9 0.8	5.3 0.5	11.1 0.7	11.1 0.9	8.6 0.6	7.2 0.4
2Q	8.0 0.3	11.3 0.4	7.5 0.4	8.3 0.4	9.5 0.8	8.4 0.4	4.9 0.3	10.9 0.5	11.2 0.5	9.5 1.3	7.3 0.7
3Q	7.9 0.5	11.2 0.9	7.5 0.7	7.9 0.4	9.5 1.3	8.9 1.2	4.5 0.6	11.2 0.7	11.3 0.7	9.5 0.9	6.9 0.4
4Q	7.7 0.5	10.5 0.7	7.2 0.5	7.7 0.5	9.2 0.7	8.6 1.2	4.6 0.3	10.7 0.9	11.2 0.8	9.2 0.8	6.8 0.6
PERIOD	13C	14C	15C	16C	27	41	42	43	44	45	46
1Q	8.4 0.7	9.1 0.6	7.3 0.6	5.7 0.5	7.6 0.6	6.5 0.5	7.1 0.7	7.8 0.5	7.8 0.5	6.8 0.4	7.9 0.7
2Q	9.1 0.5	9.5 0.4	7.9 0.4	5.9 0.5	7.4 0.5	6.9 0.3	7.3 0.7	7.2 0.3	8.1 0.6	7.3 0.4	8.3 0.4
3Q	8.8 0.8	9.5 0.8	8.0 0.6	6.2 0.5	7.2 0.5	7.2 0.8	7.5 0.5	7.1 0.6	8.0 0.8	7.2 0.7	8.2 0.6
4Q	8.7 0.7	9.4 0.6	7.7 0.5	6.0 0.4	7.5 0.6	7.0 0.8	7.2 0.6	7.4 0.6	7.9 0.7	6.8 0.5	8.4 0.7
PERIOD	47	48	49	50	51	52	53	55	56	57	59
1Q	7.5 0.5	9.0 0.6	7.5 0.9	7.8 0.5	6.5 0.6	6.9 0.5	7.1 0.4	7.2 0.5	7.1 0.5	6.8 0.6	7.4 0.8
2Q	7.8 0.5	9.3 0.7	7.9 0.4	7.9 0.5	6.5 0.8	6.9 0.4	7.4 0.4	7.2 0.3	7.3 0.9	6.9 0.4	8.0 0.5
3Q	7.6 0.5	8.9 0.5	7.6 0.8	7.7 0.6	6.5 0.5	7.1 0.5	6.9 0.7	7.2 0.7	6.8 0.5	6.6 0.5	7.8 0.6
4Q	7.4 0.5	8.9 0.7	7.6 0.6	7.6 0.8	6.1 0.4	7.1 0.5	6.9 0.7	7.2 0.5	7.0 0.5	6.7 0.4	7.8 0.5
PERIOD	60	61	62	63	64	65	66	73	74	75	
1Q	6.0 0.6	6.2 0.4	8.2 0.6	8.3 0.5	7.1 0.5	7.9 0.6	7.2 0.5	7.3 0.6	7.5 0.5	6.7 0.4	
2Q	6.7 0.3	6.5 0.3	8.0 0.5	8.4 0.9	7.0 0.6	7.9 0.4	7.5 0.7	7.1 0.4	7.6 0.4	6.8 1.0	
3Q	6.3 0.5	6.3 0.7	7.8 0.9	8.3 0.5	7.2 0.5	7.6 0.5	7.1 0.5	6.6 0.4	7.3 0.9	6.6 0.5	
4Q	6.2 0.4	6.5 0.4	8.2 0.5	8.4 0.5	7.3 0.8	7.9 0.9	6.9 0.4	6.8 0.5	7.2 0.7	6.7 0.5	

* READINGS ARE THE AVERAGE OF MULTI CaSo₄(Tm) PHOSPHOR ELEMENTS WITHIN ONE PANASONIC TLD BADGE

ERRORS ARE TWO SIGMA AND INCLUDE COUNTING, TRANSIT, READER AND FADE UNCERTAINTIES

C= Control location, Background location

TABLE 2
AIR PARTICULATES
GROSS BETA RADIOACTIVITY
(pCi/m³)

LOCATIONS

PERIOD ENDING	1	2	3	4	10	11	27	15C
	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)
01/08/19	0.012	0.010	0.011	0.012	0.012	0.009	0.011	0.013
01/22/19	0.012	0.011	0.012	0.013	0.010	0.010	0.012	0.013
02/05/19	0.015	0.014	0.015	0.016	0.017	0.016	0.016	0.016
02/19/19	0.012	0.010	0.011	0.009	0.011	0.010	0.011	0.011
03/05/19	0.015	0.014	0.014	0.014	0.016	0.014	0.016	0.015
03/19/19	0.013	0.012	0.012	0.015	0.016	0.017	0.016	0.015
04/02/19	0.013	0.014	0.012	0.015	0.016	0.014	0.014	0.014
04/16/19	0.008	0.007	0.007	0.008	0.009	0.007	0.007	0.007
04/30/19	0.010	0.009	0.009	0.009	0.009	0.009	0.009	0.009
05/14/19	0.008	0.010	0.008	0.008	0.010	0.009	0.008	0.008
05/28/19	0.008	0.010	0.009	0.009	0.008	0.008	0.009	0.008
06/11/19	0.009	0.008	0.007	0.009	0.009	0.008	0.008	0.008
06/25/19	0.007	0.007	0.008	0.009	0.009	0.008	0.008	0.009
07/09/19	0.012	0.012	0.011	0.012	0.011	0.014	0.011	0.012
07/23/19	0.009	0.010	0.011	0.011	0.012	0.011	0.010	0.011
08/06/19	0.016	0.013	0.014	0.014	0.014	0.016	0.017	0.017
08/19/19	0.014	0.012	0.015	0.014	0.015	0.014	0.014	0.016
09/03/19	0.012	0.011	0.011	0.011	0.013	0.011	0.012	0.014
09/17/19	0.012	0.013	0.014	0.012	0.013	0.013	0.014	0.012
10/01/19	0.014	0.012	0.012	0.012	0.011	0.013	0.013	0.012
10/15/19	0.012	0.012	0.010	0.011	0.011	0.011	0.012	0.011
10/29/19	0.010	0.010	0.009	0.008	0.009	0.011	0.010	0.009
11/14/19	0.012	0.012	0.011	0.013	0.012	0.012	0.012	0.012
11/26/19	0.012	0.014	0.012	0.014	0.013	0.013	0.012	0.013
12/10/19	0.010	0.011	0.011	0.010	0.009	0.011	0.011	0.009
12/23/19	0.014	0.016	0.014	0.015	0.014	0.014	0.016	0.014
01/07/20	0.014	0.015	0.014	0.014	0.013	0.014	0.013	0.013

C= Control location, Background location
3-9

TABLE 3
AIRBORNE IODINE
(pCi/m³)

LOCATIONS

PERIOD ENDING	1	2	3	4	10	11	27	15C
	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)
01/08/19	-0.002	0.015	-0.002	0.014	-0.003	0.022	-0.003	0.023
01/22/19	0.005	0.017	0.004	0.015	0.031	0.025	0.013	0.025
02/05/19	-0.004	0.014	-0.006	0.023	-0.006	0.024	-0.005	0.019
02/19/19	-0.008	0.016	-0.007	0.015	0.003	0.016	0.003	0.015
03/05/19	-0.002	0.013	-0.002	0.013	-0.010	0.022	-0.009	0.022
03/19/19	-0.003	0.015	-0.003	0.014	-0.017	0.014	-0.013	0.012
04/02/19	0.009	0.025	0.008	0.023	-0.006	0.020	-0.003	0.010
04/16/19	-0.004	0.017	-0.003	0.015	0.005	0.019	0.002	0.010
04/30/19	-0.003	0.008	-0.003	0.007	-0.001	0.012	-0.001	0.012
05/14/19	-0.006	0.010	-0.007	0.011	0.004	0.016	0.004	0.015
05/28/19	-0.002	0.008	-0.002	0.009	-0.013	0.017	-0.013	0.017
06/11/19	-0.001	0.006	-0.001	0.007	0.001	0.022	0.001	0.022
06/25/19	-0.001	0.016	-0.002	0.018	0.012	0.018	0.012	0.018
07/09/19	0.002	0.012	0.002	0.013	-0.002	0.010	-0.002	0.010
07/23/19	0.001	0.009	0.001	0.010	0.008	0.016	0.006	0.012
08/06/19	-0.012	0.023	-0.013	0.024	0.004	0.016	0.003	0.014
08/19/19	-0.006	0.019	-0.006	0.020	-0.012	0.018	-0.011	0.016
09/03/19	-0.003	0.010	-0.003	0.010	0.008	0.008	0.007	0.007
09/17/19	0.006	0.017	0.006	0.017	-0.005	0.013	-0.004	0.010
10/01/19	-0.008	0.020	-0.007	0.016	-0.007	0.016	0.010	0.013
10/15/19	-0.015	0.014	-0.014	0.014	0.004	0.018	0.004	0.018
10/29/19	0.004	0.008	0.004	0.008	-0.003	0.011	-0.003	0.011
11/14/19	0.009	0.015	0.006	0.009	-0.017	0.016	-0.016	0.015
11/26/19	0.013	0.009	0.016	0.011	0.017	0.012	-0.001	0.011
12/10/19	0.000	0.012	0.000	0.011	0.000	0.008	0.000	0.008
12/23/19	-0.004	0.019	-0.003	0.017	0.004	0.013	0.005	0.013
01/07/20	-0.007	0.008	-0.006	0.007	-0.007	0.008	0.000	0.006

C= Control location, Background location

TABLE 4
AIR PARTICULATES
(pCi/m³)

GAMMA SPECTRA - QTR 1 (12/26/18 - 04/02/19)

LOCATION	Sr-89 (+/-)	Sr-90 (+/-)	Be-7 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Co-60 (+/-)	Zn-65 (+/-)
1	0.0086	0.0157	0.1363	0.0386	-0.0004	0.0012	0.0001
2	-0.0117	0.0092	0.1413	0.0299	-0.0001	0.0010	0.0006
3	-0.0050	0.0101	0.1657	0.0320	0.0000	0.0009	0.0002
4	0.0012	0.0120	0.1355	0.0521	-0.0005	0.0017	-0.0004
10	-0.0031	0.0105	0.1207	0.0305	0.0002	0.0012	-0.0002
11	0.0089	0.0144	0.1125	0.0279	-0.0006	0.0010	0.0003
27	-0.0067	0.0122	0.1472	0.0293	-0.0018	0.0013	0.0017
15C	-0.0016	0.0125	0.1048	0.0294	-0.0010	0.0015	0.0014
LOCATION	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)
1	0.0017	0.0028	0.0007	0.0040	-0.0046	0.0125	-0.0144
2	0.0010	0.0017	0.0025	0.0032	-0.0043	0.0097	-0.0566
3	0.0003	0.0015	-0.0004	0.0025	-0.0018	0.0095	0.0120
4	0.0013	0.0027	-0.0009	0.0039	-0.0034	0.0123	-0.1336
10	0.0008	0.0017	-0.0024	0.0025	-0.0029	0.0094	0.0612
11	0.0012	0.0022	-0.0017	0.0031	-0.0001	0.0101	0.0464
27	-0.0004	0.0021	0.0004	0.0057	0.0159	0.0138	-0.0177
15C	-0.0002	0.0023	-0.0003	0.0035	0.0038	0.0123	-0.0191
LOCATION	Ce-141 (+/-)	Ce-144 (+/-)					
1	-0.0007	0.0051	0.0009	0.0056			
2	0.0006	0.0038	0.0035	0.0050			
3	-0.0025	0.0036	-0.0002	0.0043			
4	0.0018	0.0057	-0.0036	0.0061			
10	0.0043	0.0040	0.0008	0.0042			
11	-0.0033	0.0039	-0.0023	0.0044			
27	-0.0064	0.0063	0.0050	0.0070			
15C	-0.0062	0.0049	0.0000	0.0060			

C= Control location, Background location
Results in bold type are positive.

TABLE 4
AIR PARTICULATES
(pCi/m³)

GAMMA SPECTRA - QTR 2 (04/02/19 - 06/25/19)

LOCATION	Sr-89 (+/-)	Sr-90 (+/-)	Be-7 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Co-60 (+/-)	Zn-65 (+/-)
1	0.0065	0.0119	0.0932	-0.0001	0.0011	0.0007	0.0001
2	-0.0005	0.0114	0.1002	-0.0011	0.0016	0.0004	0.0006
3	-0.0044	0.0121	0.1270	-0.0020	0.0015	0.0003	0.0043
4	-0.0078	0.0087	0.1057	-0.0010	0.0010	-0.0008	-0.0007
10	-0.0038	0.0090	0.1434	0.0000	0.0016	-0.0006	-0.0008
11	-0.0045	0.0151	0.1406	0.0000	0.0013	-0.0013	0.0031
27	0.0061	0.0174	0.0994	0.0009	0.0014	0.0007	0.0008
15C	-0.0021	0.0126	0.1004	-0.0003	0.0011	0.0000	0.0023
LOCATION	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)
1	0.0033	0.0023	-0.0002	-0.0013	0.0094	0.0010	-0.0213
2	0.0013	0.0025	-0.0020	0.0002	0.0137	0.0008	0.0407
3	-0.0011	0.0028	0.0014	0.0003	0.0129	0.0008	0.0463
4	0.0000	0.0017	-0.0006	0.0004	0.0109	0.0001	-0.0715
10	-0.0008	0.0029	0.0016	-0.0025	0.0129	-0.0008	0.0449
11	0.0003	0.0022	0.0003	-0.0044	0.0088	0.0002	-0.0479
27	-0.0017	0.0022	-0.0013	0.0011	0.0118	0.0018	0.0751
15C	0.0010	0.0019	0.0007	-0.0027	0.0098	0.0001	-0.0155
LOCATION	Ce-141 (+/-)	Ce-144 (+/-)					
1	-0.0007	0.0047	-0.0021	0.0058			
2	-0.0067	0.0054	-0.0022	0.0065			
3	-0.0033	0.0053	0.0040	0.0070			
4	0.0028	0.0035	0.0009	0.0051			
10	0.0011	0.0056	-0.0005	0.0072			
11	0.0022	0.0031	0.0022	0.0043			
27	0.0011	0.0048	0.0022	0.0067			
15C	-0.0019	0.0040	-0.0006	0.0055			

C= Control location, Background location
Results in bold type are positive.

TABLE 4
AIR PARTICULATES
(pCi/m³)

GAMMA SPECTRA - QTR 3 (06/25/19 - 10/01/19)

LOCATION	Sr-89 (+/-)	Sr-90 (+/-)	Ba-7 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Co-60 (+/-)	Zn-65 (+/-)
1	-0.0037	0.0087	0.0786	0.0005	-0.0002	0.0000	0.0006
2	-0.0024	0.0080	0.1133	0.0017	-0.0009	0.0010	0.0001
3	0.0104	0.0146	0.1345	0.0000	-0.0003	-0.0010	0.0010
4	0.0036	0.0093	0.1091	0.0007	-0.0008	0.0005	-0.0015
10	-0.0069	0.0103	0.1136	0.0002	0.0006	0.0007	0.0009
11	0.0097	0.0118	0.1214	0.0003	0.0010	-0.0002	0.0010
27	0.0023	0.0113	0.1094	0.0000	0.0001	0.0000	0.0019
15C	0.0033	0.0106	0.1269	0.0000	-0.0003	0.0006	0.0016

LOCATION	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)
1	0.0019	0.0017	-0.0020	-0.0035	0.0010	0.0000	0.0024
2	0.0020	0.0018	0.0000	-0.0084	0.0001	-0.0001	-0.0416
3	0.0003	0.0017	-0.0022	-0.0097	0.0012	0.0013	0.0348
4	-0.0008	0.0020	-0.0010	-0.0043	0.0005	0.0001	0.0145
10	0.0000	0.0017	0.0002	0.0051	-0.0012	0.0001	-0.0407
11	0.0012	0.0013	-0.0010	0.0048	0.0008	0.0004	-0.0137
27	0.0005	0.0014	0.0006	-0.0012	-0.0001	0.0002	0.0592
15C	0.0005	0.0013	-0.0018	-0.0012	0.0003	0.0000	0.0740

LOCATION	Ce-141 (+/-)	Ce-144 (+/-)
1	0.0037	0.0033
2	0.0003	0.0026
3	-0.0004	0.0035
4	0.0015	0.0037
10	-0.0002	0.0031
11	-0.0009	0.0025
27	-0.0022	0.0035
15C	0.0016	0.0029

C= Control location, Background location
Results in bold type are positive.

TABLE 4
AIR PARTICULATES
(pCi/m³)

GAMMA SPECTRA - QTR 4 (10/01/19 - 01/07/20)

LOCATION	Sr-89 (+/-)	Sr-90 (+/-)	Be-7 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Co-60 (+/-)	Zn-65 (+/-)
1	-0.0113	0.0104	0.0914	-0.0002	0.0012	0.0016	0.0018
2	0.0013	0.0100	0.0966	0.0000	0.0012	-0.0010	0.0016
3	0.0076	0.0085	0.0744	-0.0001	0.0008	-0.0006	0.0009
4	0.0078	0.0102	0.0731	-0.0002	0.0008	0.0005	0.0013
10	-0.0006	0.0086	0.0885	-0.0007	0.0007	-0.0006	0.0014
11	0.0079	0.0108	0.0946	0.0003	0.0009	-0.0007	0.0011
27	0.0106	0.0121	0.0800	-0.0005	0.0014	-0.0004	0.0022
15C	-0.0031	0.0078	0.0819	-0.0002	0.0010	-0.0004	0.0016

LOCATION	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)
1	0.0000	0.0020	-0.0014	0.0088	0.0010	0.0002	-0.0462
2	0.0005	0.0019	-0.0016	0.0010	-0.0007	0.0002	0.0675
3	-0.0002	0.0012	0.0009	-0.0016	-0.0005	-0.0001	-0.0044
4	0.0018	0.0015	-0.0001	-0.0031	0.0008	-0.0002	-0.0252
10	-0.0002	0.0014	-0.0002	0.0079	-0.0001	-0.0001	0.0531
11	0.0003	0.0012	0.0006	-0.0041	0.0005	0.0004	0.0235
27	-0.0019	0.0024	0.0018	0.0115	0.0011	0.0003	0.0846
15C	-0.0004	0.0017	0.0014	0.0020	-0.0004	0.0003	0.0060

LOCATION	Ce-141 (+/-)	Ce-144 (+/-)
1	-0.0011	0.0034
2	0.0000	0.0041
3	0.0005	0.0027
4	0.0025	0.0025
10	-0.0008	0.0025
11	0.0005	0.0026
27	0.0017	0.0047
15C	0.0008	0.0037

C= Control location, Background location
Results in bold type are positive.

TABLE 5
SOIL
(pCi/g dry wt.)

LOCATIONS

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Be-7</u> (+/-)	<u>K-40</u> (+/-)	<u>Cr-51</u> (+/-)	<u>Mn-54</u> (+/-)	<u>Co-58</u> (+/-)	<u>Fe-59</u> (+/-)
3	05/07/19	0.031	13.200	0.022	0.003	-0.027	-0.050
4	05/07/19	0.604	13.390	0.099	0.002	0.010	0.019
14C	05/07/19	0.608	14.900	-0.129	0.020	0.004	-0.058
		0.580	1.328	0.316	0.039	0.036	0.077

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Co-60</u> (+/-)	<u>Zn-65</u> (+/-)	<u>Nb-95</u> (+/-)	<u>Zr-95</u> (+/-)	<u>Ru-103</u> (+/-)	<u>Ru-106</u> (+/-)
3	05/07/19	0.004	0.056	0.010	-0.001	-0.007	0.102
4	05/07/19	0.023	0.072	0.040	-0.044	0.020	0.350
14C	05/07/19	0.010	0.017	0.020	-0.008	-0.004	0.175
		0.042	0.100	0.040	0.064	0.036	0.303

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Sb-125</u> (+/-)	<u>Cs-134</u> (+/-)	<u>Cs-137</u> (+/-)	<u>Ce-141</u> (+/-)	<u>Ce-144</u> (+/-)	<u>Ac-228</u> (+/-)
3	05/07/19	0.009	0.018	0.189	-0.014	-0.033	0.213
4	05/07/19	-0.053	0.076	0.312	-0.026	0.066	0.091
14C	05/07/19	-0.015	0.030	0.154	0.037	0.088	1.073
		0.106	0.044	0.069	0.058	0.240	0.281

C= Control location, Background location
 Results in bold type are positive.

TABLE 6
MILK
(pCi/l)

LOCATION	COLLECTION DATE	I-131 (+/-)	Sr-89 (+/-)	Sr-90 (+/-)	K-40 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)
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22
 Cow

Milk was not available for collection in 2019.
 Strontium analysis of air samples and gamma analysis of Broadleaf vegetation were performed as a substitute
 (Table 4 & Table 9)

23
 Goat

**TABLE 7
WELL WATER
(pCi/l)**

LOCATION	COLLECTION DATE	H-3 (+/-)	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)						
71	03/13/19	-18	33.9	-17.5	47.4	-35.2	40.6	0.80	3.52	-3.39	3.62	-6.10	7.31	2.67	3.02
	05/22/19	-6	469	-12.7	61.6	3.07	41.3	-4.16	5.21	-1.32	4.85	-4.99	10.3	3.65	5.14
	08/21/19	227	551	-24.5	52.9	-30.5	40.0	-3.01	4.08	0.02	3.84	-0.40	7.58	2.77	3.94
	11/06/19	102	574	73.4	81.9	-11.9	44.9	1.83	5.60	-1.77	4.96	-7.47	9.50	0.49	3.88
72	03/13/19	-53	493	-66.5	74.8	-26.4	46.0	0.91	4.97	-1.30	4.92	0.78	8.53	-0.12	4.51
	05/22/19	-108	467	-12.9	64.5	-38.8	40.7	2.65	4.49	1.19	4.92	3.98	9.97	3.86	5.08
	08/20/19	316	555	32.9	65.6	-33.6	40.4	1.41	4.11	1.71	4.03	-8.71	8.69	-0.65	3.67
	11/06/19	368	601	0.17	84.8	8.49	41.8	-1.00	4.32	-2.04	4.49	2.15	10.1	1.40	4.34
76	02/04/19	-53	469	-14.2	49.8	-4.03	34.8	-3.23	3.87	0.94	3.29	-9.57	7.59	0.18	4.35
	05/20/19	183	495	-12.1	52.6	22.0	34.7	2.14	3.93	-1.36	3.89	-4.03	9.39	-0.54	3.96
	08/19/19	-90	551	-11.1	30.7	-0.69	19.5	-0.11	2.03	-0.43	1.88	3.98	4.51	2.23	2.18
	11/04/19	422	574	73.0	61.6	-17.7	32.2	-1.46	3.68	0.71	3.52	1.38	6.46	-0.32	3.47
77	02/05/19	192	471	-13.3	55.8	-16.5	41.3	-0.43	4.25	-4.94	4.50	6.19	8.28	2.07	3.98
	05/20/19	-29	482	41.4	93.2	46.1	51.7	-2.93	5.85	-3.01	5.78	-5.34	9.96	0.81	5.23
	08/19/19	77	563	37.0	49.0	-4.43	26.3	-0.17	2.52	0.28	2.71	-1.78	5.06	3.01	2.39
	11/04/19	201	556	-2.91	70.8	-13.9	49.0	-6.78	5.80	0.67	5.41	-0.80	11.6	0.26	5.89
78	02/04/19	46	462	-7.52	47.4	-39.9	32.1	2.78	3.78	-3.27	3.39	-1.03	6.79	0.43	4.12
	05/20/19	-12	488	-60.6	45.5	19.2	30.8	-1.52	3.70	-0.53	2.91	-0.40	5.94	0.33	3.26
	08/19/19	227	580	43.1	53.5	5.50	24.9	0.11	2.27	-0.77	2.32	2.31	5.02	-0.36	2.53
	11/04/19	261	552	9.92	54.3	-39.4	36.4	-1.63	4.43	-3.08	4.70	-4.88	9.23	0.48	4.61
79	02/06/19	324	460	-38.9	55.7	5.05	36.5	-0.25	3.91	-1.61	4.02	5.62	8.22	1.07	3.73
	05/22/19	-17	482	-55.1	70.1	18.2	45.0	-0.60	5.57	-3.33	4.80	-12.4	10.2	-0.24	6.70
	08/21/19	275	548	12.1	65.5	2.71	31.7	1.01	3.24	-1.24	3.72	0.27	6.25	1.35	3.40
	11/06/19	360	599	41.9	85.9	-23.1	41.8	-2.72	5.44	2.13	4.35	-6.07	8.61	1.37	4.17
81	03/13/19	327	524	-37.7	38.9	-4.06	43.6	1.50	3.87	-3.19	3.89	4.74	7.06	4.28	3.86
	05/22/19	502	522	-7.33	38.6	-12.0	41.8	4.20	4.73	-1.75	5.03	7.44	8.28	2.19	4.34
	07/09/19	47	511	-3.41	30.2	-5.62	30.5	-0.66	3.34	0.62	3.30	-1.94	6.45	1.38	2.97
	11/06/19	713	618	-23.6	38.9	29.7	43.4	-2.41	4.20	-3.15	3.99	-4.39	9.37	-1.76	5.05
82	02/06/19	55	430	-27.5	50.1	-7.95	32.1	1.78	3.17	-1.18	3.29	2.02	6.04	-0.19	2.88
	04/29/19	-29	468	-26.7	79.3	-24.6	60.4	-6.64	6.99	-0.15	6.71	-8.78	12.3	0.21	6.46
	07/09/19	138	523	7.55	47.4	-3.96	50.7	-5.35	4.77	-4.39	4.30	-5.11	8.02	-1.02	4.15
	11/15/19	180	213	20.4	42.7	-8.50	33.5	-5.33	3.68	-5.86	3.75	-8.83	7.50	0.04	3.58
83	02/06/19	-69	457	-8.37	62.3	-12.7	41.4	2.16	3.94	-2.80	4.29	0.98	7.85	2.10	4.27
	05/22/19	76	493	-27.4	57.9	13.6	42.8	-0.53	3.62	-0.34	4.88	-2.90	9.85	-2.97	4.85
	08/20/19	123	541	-5.52	53.5	-6.10	46.5	2.86	3.19	-3.15	4.22	3.53	8.81	0.48	3.39
	11/05/19	-116	563	-12.7	53.1	6.57	42.0	1.55	3.74	0.86	3.81	-0.99	9.27	1.53	4.05

**TABLE 7
WELL WATER
(pCi/l)**

LOCATION	COLLECTION DATE	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)	Cs-134 (+/-)
71	03/13/19	8.26	5.00	0.22	-2.01	-9.19	2.77	-0.11	0.46
	05/22/19	5.57	1.65	-4.79	-0.56	3.83	-8.59	2.14	4.10
	08/21/19	-1.57	-0.02	2.10	-0.82	-1.23	-8.03	-1.82	1.10
	11/06/19	-3.35	1.55	-2.76	0.04	-5.71	3.82	1.60	4.93
72	03/13/19	-2.20	1.01	-4.21	-3.45	-14.1	-8.11	-2.03	-1.31
	05/22/19	-5.25	-2.01	-1.83	-6.37	-37.9	3.08	0.71	4.69
	08/20/19	-3.16	2.93	0.90	2.00	17.8	1.62	-5.91	-1.22
	11/06/19	-0.24	4.47	-0.35	-2.75	40.2	-4.04	4.66	4.85
76	02/04/19	2.70	0.35	-4.18	-2.49	8.62	4.15	-0.12	-1.04
	05/20/19	-4.53	1.42	3.90	-1.38	-13.3	3.61	-0.12	4.32
	08/19/19	-12.1	-1.04	-0.13	3.70	18.8	-0.24	0.29	3.84
	11/04/19	0.93	9.40	2.11	-2.07	-15.4	5.64	-2.65	2.45
77	02/05/19	19.9	9.31	3.96	-0.54	-22.5	-2.21	1.21	-1.01
	05/20/19	10.9	5.41	-11.0	-0.60	15.5	-4.08	7.06	4.21
	08/19/19	12.6	1.62	1.20	1.38	17.8	4.22	4.26	-0.28
	11/04/19	7.28	30.3	-1.39	-3.51	26.3	4.76	-7.99	1.51
78	02/04/19	-7.07	-0.66	1.04	-0.40	13.0	-0.26	0.75	4.38
	05/20/19	-12.6	1.15	-1.99	2.35	-24.2	1.16	-0.10	1.89
	08/19/19	-12.4	2.07	2.25	-3.52	14.3	5.84	2.81	3.42
	11/04/19	0.35	16.2	-1.49	-3.49	-13.0	2.40	3.87	-1.97
79	02/06/19	-16.5	-2.45	0.63	-4.28	-1.80	2.31	-0.75	-0.52
	05/22/19	-3.96	-2.57	0.88	3.64	-30.9	5.05	2.61	4.49
	08/21/19	-9.85	2.88	-1.84	-3.10	20.3	5.07	0.13	-2.70
	11/06/19	-15.6	-2.16	-6.49	-3.13	12.4	0.81	-0.58	3.86
81	03/13/19	28.0	6.14	-2.51	-2.05	-4.94	4.11	-5.16	-5.34
	05/22/19	7.65	1.88	-3.30	-1.75	-11.8	11.4	-1.46	-2.42
	07/09/19	-1.59	1.82	-0.30	1.78	-1.75	-2.13	-2.58	4.95
	11/06/19	-6.07	8.56	-0.98	-4.71	7.68	0.40	1.73	0.14
82	02/06/19	-1.94	1.47	0.74	2.41	0.97	2.02	-0.73	2.18
	04/29/19	9.70	9.22	4.75	1.05	14.6	-6.98	-7.57	4.52
	07/09/19	1.24	14.0	-3.71	-3.37	-1.36	1.80	-3.78	1.52
	11/15/19	0.72	20.2	4.27	0.78	-9.60	3.17	0.09	5.84
83	02/06/19	1.18	-1.35	-5.40	2.74	3.75	-3.96	3.06	0.04
	05/22/19	5.84	0.99	-4.89	1.24	2.30	-5.26	1.52	-0.14
	08/20/19	7.29	3.20	3.62	-2.99	17.3	5.43	-1.96	5.84
	11/05/19	-1.17	5.27	-2.51	-1.59	-20.5	-0.26	0.00	3.68

**TABLE 7
WELL WATER
(pCi/l)**

LOCATION	COLLECTION DATE	Cs-137			Ba-140			La-140			Ac-228		
		(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	
71	03/13/19	-1.95	4.15	-2.10	18.8	-3.13	5.01	9.54	12.7				
	05/22/19	-8.73	5.65	-2.81	17.6	-2.45	5.29	-15.9	19.2				
	08/21/19	-1.80	3.75	13.1	18.7	1.10	5.25	-0.54	15.3				
	11/06/19	-0.26	4.64	5.18	20.5	1.64	8.30	-5.95	18.7				
72	03/13/19	-0.32	3.97	-0.59	21.4	-1.72	6.58	0.35	16.7				
	05/22/19	-5.33	4.25	2.05	18.7	1.10	6.41	-3.24	17.0				
	08/20/19	-0.99	4.41	13.8	19.4	-0.35	6.48	-1.58	13.6				
	11/06/19	-4.37	5.45	4.03	22.4	-0.58	7.12	-1.93	19.0				
76	02/04/19	-2.72	4.99	12.2	15.3	2.05	7.17	-4.09	15.6				
	05/20/19	-2.02	4.63	6.74	17.7	3.15	4.11	-6.04	13.5				
	08/19/19	2.68	2.08	-2.33	10.4	-1.98	4.61	-6.41	8.27				
	11/04/19	-0.21	4.30	-5.12	16.0	-1.83	4.05	5.24	16.8				
77	02/05/19	-4.57	4.32	-3.61	20.4	0.13	6.40	6.22	16.0				
	05/20/19	-3.66	5.81	2.18	22.7	-2.49	8.39	-0.74	20.7				
	08/19/19	-0.60	2.66	4.09	14.2	7.68	4.34	6.26	9.68				
	11/04/19	-10.7	6.21	-6.00	22.3	-3.01	8.20	-13.3	19.2				
78	02/04/19	-3.19	3.88	-5.97	15.1	3.61	5.71	-9.86	15.6				
	05/20/19	-2.24	3.66	-4.62	13.8	-2.32	4.89	-7.03	11.5				
	08/19/19	-1.71	2.34	2.55	12.5	-0.02	3.45	2.99	8.61				
	11/04/19	-6.48	4.87	7.97	17.4	1.55	5.76	8.57	19.3				
79	02/06/19	-2.16	4.38	9.65	16.5	-1.78	7.81	16.1	16.3				
	05/22/19	-2.05	5.01	-4.66	18.8	-0.32	7.04	-5.00	20.6				
	08/21/19	0.89	3.25	2.52	14.0	3.48	4.93	-2.22	12.3				
	11/06/19	0.40	5.40	-3.47	20.8	1.48	7.16	1.32	20.5				
81	03/13/19	-0.16	4.14	9.89	20.8	-0.87	5.38	-9.06	14.6				
	05/22/19	-3.44	5.26	1.57	16.3	1.36	5.18	0.53	18.7				
	07/09/19	0.02	2.99	-1.40	14.3	4.12	4.99	0.36	11.3				
	11/06/19	-1.65	5.13	-1.35	21.3	0.19	7.69	15.2	14.7				
82	02/06/19	0.98	3.69	-6.88	15.1	1.22	4.48	-3.23	12.3				
	04/29/19	-11.4	7.19	-12.9	27.5	-0.93	8.86	10.1	22.9				
	07/09/19	0.05	4.71	3.39	21.7	-1.94	6.61	-6.33	15.8				
	11/15/19	0.51	3.99	-6.87	15.8	3.45	5.89	15.4	13.8				
83	02/06/19	-2.02	4.44	10.9	19.1	-4.60	7.13	12.7	18.7				
	05/22/19	-2.59	5.15	-12.3	18.4	-2.23	5.17	-1.87	15.9				
	08/20/19	-2.63	4.93	-9.59	22.0	-2.79	6.53	8.93	16.7				
	11/05/19	-1.43	4.32	-25.6	19.3	-0.93	5.24	-4.06	13.7				

TABLE 8
FRUITS & VEGETABLES
(pCi/g wet wt.)

LOCATION 25 (fruit are extra samples not required by the REMODCM)

COLLECTION DATE	Type	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)
01/14/19	Squash	-0.023	0.777	-0.038	0.004	0.000	0.001	0.004
07/25/19	Lettuce	0.928	0.434	0.060	-0.001	-0.002	0.007	0.009
07/25/19	Apples	-0.054	0.238	0.021	0.006	0.001	0.008	0.007
10/08/19	Tomatoes	-0.083	1.735	0.158	0.009	-0.001	-0.015	-0.005
10/08/19	Apples	-0.054	0.362	-0.053	0.007	0.014	-0.008	-0.004
		0.147	0.330	0.148	0.014	0.012	0.029	0.014

COLLECTION DATE	Type	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)
01/14/19	Squash	-0.002	0.023	-0.003	-0.010	-0.037	-0.007	-0.002
07/25/19	Lettuce	-0.020	0.032	-0.010	0.001	-0.008	0.007	0.014
07/25/19	Apples	0.006	0.024	-0.018	-0.003	-0.071	0.001	0.002
10/08/19	Tomatoes	-0.004	0.043	0.009	-0.007	0.114	0.047	-0.005
10/08/19	Apples	-0.078	0.035	-0.008	0.005	-0.128	0.002	-0.003

COLLECTION DATE	Type	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ce-141 (+/-)	Ce-144 (+/-)	Ac-228 (+/-)
01/14/19	Squash	0.009	0.010	-0.035	0.006	0.013	-0.022	-0.007
07/25/19	Lettuce	0.002	0.016	-0.010	0.002	-0.001	-0.030	0.028
07/25/19	Apples	-0.019	0.014	-0.020	-0.004	-0.006	-0.045	0.062
10/08/19	Tomatoes	-0.005	0.018	0.036	0.009	0.008	-0.013	0.043
10/08/19	Apples	0.001	0.016	-0.071	0.010	-0.004	0.071	-0.002

Results in bold type are positive.

TABLE 8
FRUITS & VEGETABLES
(pCi/g wet wt.)

LOCATION 26C (fruit are extra samples not required by the REMODCM)

COLLECTION DATE	Type	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)
07/25/19	Lettuce	0.029	0.115	0.010	0.117	-0.004	0.012	-0.012
07/25/19	Plums	0.003	0.111	0.107	0.104	-0.005	0.015	-0.009
10/08/19	Tomatoes	0.013	0.165	-0.178	0.181	-0.002	0.021	0.004
10/08/19	Apples	-0.052	0.116	0.123	0.124	-0.004	0.014	0.006
								0.016
COLLECTION DATE	Type	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)
07/25/19	Lettuce	0.000	0.038	-0.023	0.026	0.090	0.123	-0.012
07/25/19	Plums	-0.002	0.028	0.001	0.022	0.043	0.115	0.000
10/08/19	Tomatoes	0.071	0.056	0.005	0.032	-0.030	0.170	0.020
10/08/19	Apples	-0.015	0.031	0.005	0.025	-0.023	0.115	0.001
								0.019
COLLECTION DATE	Type	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ce-141 (+/-)	Ce-144 (+/-)	Ac-228 (+/-)
07/25/19	Lettuce	-0.003	0.014	0.040	0.055	0.006	0.019	-0.020
07/25/19	Plums	0.011	0.013	0.032	0.053	-0.003	0.018	-0.003
10/08/19	Tomatoes	-0.018	0.022	-0.004	0.084	0.010	0.030	0.066
10/08/19	Apples	-0.004	0.013	0.005	0.061	0.014	0.019	0.023
								0.042

C= Control location, Background location
Results in bold type are positive.

TABLE 9
BROADLEAF VEGETATION
(pCi/g wet wt.)

LOCATION 1

COLLECTION DATE	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)
06/24/19	1.050	4.392	-0.116	-0.013	-0.006	-0.001	0.012
10/08/19	0.302	0.664	0.073	0.009	0.008	0.017	0.009
	2.726	0.317					
	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)
06/24/19	-0.062	-0.010	0.000	0.006	-0.058	0.019	-0.011
10/08/19	0.049	0.017	0.029	0.015	0.136	0.040	0.021
	-0.028	0.008	0.014	0.008	-0.016	0.022	-0.001
	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ce-141 (+/-)	Ce-144 (+/-)	Ac-228 (+/-)
06/24/19	-0.016	-0.009	0.023	0.011	0.006	0.090	0.078
10/08/19	0.021	0.016	0.052	0.022	0.024	0.105	0.069
	0.001	0.009	0.032	-0.006	0.014	0.057	0.111

LOCATION 10

COLLECTION DATE	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)
06/25/19	0.571	4.587	0.131	0.020	-0.002	-0.046	0.009
10/08/19	0.243	0.759	0.176	0.017	0.015	0.038	0.018
	1.039	0.564		-0.012	0.022	0.045	0.028
	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)
06/25/19	0.010	-0.003	0.011	-0.003	0.048	-0.014	0.007
10/08/19	0.048	0.018	0.027	0.017	0.161	0.043	0.019
	0.047	0.024	0.038	0.020	0.159	0.061	-0.018
							0.027
	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ce-141 (+/-)	Ce-144 (+/-)	Ac-228 (+/-)
06/25/19	0.002	-0.007	0.058	-0.002	0.011	0.014	-0.009
10/08/19	0.017	0.018	0.063	0.015	0.024	0.087	0.070
	0.003	0.024	0.089	-0.005	-0.017	0.137	-0.010
				0.024	0.032		0.095

Results in bold type are positive.

TABLE 9
BROADLEAF VEGETATION
(pCi/g wet wt.)

LOCATION 17																																		
COLLECTION DATE	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ce-141 (+/-)	Ce-144 (+/-)	Ac-228 (+/-)													
06/24/19	0.828	0.269	-0.027	0.130	0.009	0.016	-0.004	0.013	-0.015	0.032	0.000	0.015	-0.021	0.034	0.006	0.022	-0.004	0.013	-0.005	0.015	-0.021	0.034	0.006	0.022	0.008	0.018	0.012	0.018	0.075	0.131	0.124	0.084		
10/08/19	1.829	0.331	-0.110	0.133	-0.006	0.020	0.005	0.015	-0.021	0.034	0.006	0.015	-0.021	0.034	0.006	0.022	-0.001	0.014	-0.005	0.022	0.019	0.019	0.130	0.015	0.047	0.012	0.018	0.075	0.131	0.124	0.084			
06/24/19	-0.009	0.032	-0.003	0.027	-0.004	0.015	-0.016	0.136	-0.022	0.040	0.008	0.018	-0.022	0.040	0.008	0.018	-0.003	0.035	0.012	0.019	0.015	0.047	0.012	0.018	0.015	0.047	0.012	0.018	0.075	0.131	0.124	0.084		
10/08/19	-0.014	0.042	0.003	0.035	0.012	0.019	0.004	0.130	0.015	0.047	0.012	0.019	0.015	0.047	0.012	0.018	0.061	0.080	-0.005	0.022	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097
06/24/19	0.002	0.014	0.019	0.019	0.000	0.012	-0.005	0.022	-0.041	0.098	0.075	0.131	-0.041	0.098	0.075	0.131	0.019	0.060	-0.005	0.022	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097
10/08/19	0.009	0.018	0.012	0.021	-0.033	0.027	-0.001	0.022	-0.001	0.027	-0.001	0.022	0.019	0.097	0.019	0.097	0.061	0.080	-0.001	0.022	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097	0.019	0.097

LOCATION 26C																																
COLLECTION DATE	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)	I-131 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ce-141 (+/-)	Ce-144 (+/-)	Ac-228 (+/-)											
06/25/19	0.609	0.194	-0.042	0.136	0.005	0.015	-0.005	0.017	-0.002	0.018	0.006	0.016	-0.019	0.045	-0.011	0.018	0.006	0.031	-0.019	0.149	0.015	0.018	-0.011	0.018	-0.005	0.017	0.075	0.131	0.124	0.084		
10/08/19	1.738	0.296	-0.137	0.130	-0.009	0.019	-0.009	0.017	0.011	0.017	-0.003	0.016	-0.027	0.045	-0.001	0.020	0.010	0.031	-0.024	0.134	0.006	0.091	-0.001	0.020	0.009	0.015	0.075	0.131	0.124	0.084		
06/25/19	-0.040	0.040	0.006	0.031	-0.019	0.149	-0.011	0.017	-0.002	0.018	0.006	0.016	0.015	0.045	-0.011	0.018	0.006	0.031	-0.019	0.149	0.015	0.018	-0.011	0.018	-0.005	0.017	0.075	0.131	0.124	0.084		
10/08/19	-0.007	0.037	0.010	0.031	-0.003	0.016	-0.003	0.016	0.011	0.017	-0.003	0.016	-0.027	0.045	-0.001	0.020	0.010	0.031	-0.024	0.134	0.006	0.091	-0.001	0.020	0.009	0.015	0.075	0.131	0.124	0.084		
06/25/19	0.000	0.019	-0.064	0.056	-0.021	0.026	-0.021	0.026	-0.005	0.016	-0.005	0.016	0.027	0.112	0.075	0.131	-0.064	0.056	-0.021	0.026	0.027	0.112	0.075	0.131	0.027	0.112	0.075	0.131	0.124	0.084		
10/08/19	0.004	0.018	0.012	0.060	0.000	0.022	0.000	0.022	0.010	0.019	0.006	0.015	0.008	0.091	0.123	0.071	0.012	0.060	0.000	0.022	0.008	0.091	0.123	0.071	0.008	0.091	0.123	0.071	0.123	0.071	0.123	0.071

C= Control location, Background location
Results in bold type are positive.

TABLE 10
SEA WATER
(pCi/l)

LOCATION 32

COLLECTION DATE	H-3 (+/-)	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)
01/29/19	441	24.5	141	-13.4	-3.43	-0.24	-2.91
02/26/19	1120	-8.34	328	-11.7	-0.76	-2.28	3.43
03/26/19	1240	23.8	302	40.7	-0.61	-2.57	3.43
04/30/19	4780	-6.18	297	-10.7	-0.94	2.71	4.34
05/28/19	1430	5.70	381	-7.03	-2.18	-1.44	-5.07
06/25/19	493	-12.9	343	18.5	1.31	5.86	2.66
07/30/19	140	20.7	253	-4.42	-1.03	-2.44	-3.02
08/27/19	402	9.79	375	-25.4	-2.14	-0.19	1.53
09/24/19	449	-30.7	408	-36.6	0.63	2.34	10.3
10/29/19	412	3.59	303	-6.04	-1.08	-3.28	0.36
11/26/19	519	19.8	318	34.8	1.54	1.96	3.77
12/31/19	832	-16.9	229	8.17	-1.03	2.46	0.53
		24.8	78	27.2	3.20		6.23

COLLECTION DATE	Co-60 (+/-)	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)
01/29/19	0.67	3.10	3.66	-1.89	-0.86	23.0	-1.93
02/26/19	1.27	-5.02	1.92	1.55	-2.97	-6.75	3.74
03/26/19	0.20	-6.26	3.74	3.81	-3.34	-31.4	-4.33
04/30/19	-1.57	-3.79	-1.96	-0.18	-0.79	4.22	0.04
05/28/19	-1.30	2.56	0.18	-0.73	-0.35	5.50	3.36
06/25/19	0.04	-8.09	0.90	-3.75	-1.38	29.5	-0.33
07/30/19	0.20	-13.8	4.86	-1.56	-1.89	1.95	0.45
08/27/19	-0.77	-7.97	1.72	-9.22	-5.96	21.5	1.71
09/24/19	0.00	-16.1	1.81	1.45	-2.30	-13.6	5.06
10/29/19	3.57	-10.1	-0.47	-1.08	3.61	5.10	6.56
11/26/19	2.76	-6.55	2.04	5.82	-0.89	14.2	-3.38
12/31/19	0.04	4.06	1.75	2.27	-0.28	-9.87	-1.48
	3.41	7.62	3.20	5.43	3.65	27.8	8.11

Results in bold type are positive.

TABLE 10
SEA WATER
(pCi/l)

LOCATION 32 Cont'd

COLLECTION DATE	I-131 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ac-228 (+/-)
01/29/19	-3.96	2.96	5.43	3.79	-1.67	17.1
02/26/19	-4.10	3.57	-1.93	2.14	-2.48	-7.89
03/26/19	-1.60	0.62	-0.83	2.33	-3.10	-13.1
04/30/19	1.83	-2.44	3.54	-12.6	3.80	-1.72
05/28/19	0.08	3.24	-0.65	1.02	-2.36	8.12
06/25/19	-4.23	-2.60	0.66	-17.8	-2.42	7.76
07/30/19	1.49	0.94	-1.45	-1.58	-4.28	6.93
08/27/19	-2.25	-2.30	0.34	5.01	-1.65	-3.11
09/24/19	-3.68	-2.63	1.94	8.86	-2.76	-6.00
10/29/19	-0.26	1.13	1.90	-6.01	2.35	13.2
11/26/19	-3.87	-1.42	-0.92	2.42	0.96	-0.66
12/31/19	-1.99	1.13	-0.26	3.61	2.14	-6.02

LOCATION 37C

COLLECTION DATE	H-3 (+/-)	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)
03/26/19	38	32.5	112	26.1	2.76	2.65	-2.89
06/25/19	132	-22.8	183	-4.75	-1.23	-2.72	10.1
09/24/19	256	-20.5	286	-5.60	0.59	2.46	-0.42
12/31/19	-2	-0.40	300	6.40	1.02	0.94	5.26

COLLECTION DATE	Co-60 (+/-)	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)	Sb-125 (+/-)
03/26/19	0.23	-0.88	-0.30	5.14	-0.75	30.3	-3.25
06/25/19	4.94	-14.3	1.90	3.35	-2.72	-21.4	-1.10
09/24/19	-2.25	-10.8	-0.07	-7.37	-3.08	-16.8	2.10
12/31/19	-2.07	-2.96	1.70	2.59	0.43	3.61	-7.23

COLLECTION DATE	I-131 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ba-140 (+/-)	La-140 (+/-)	Ac-228 (+/-)
03/26/19	0.00	-1.27	1.61	-2.01	-1.20	-0.08
06/25/19	1.59	-0.51	1.25	-0.38	3.32	5.52
09/24/19	1.97	3.32	4.47	9.67	-0.38	2.63
12/31/19	-0.88	-1.03	-0.33	3.67	-1.16	-6.49

C= Control location, Background location
Results in bold type are positive.

TABLE 11
BOTTOM SEDIMENT
(pCi/g dry wt.)

LOCATION	COLLECTION DATE	COLLECTION													
		Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)	Co-60 (+/-)	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)		
31	03/12/19	0.065	14.35	0.344	0.024	-0.001	-0.001	0.344	0.024	-0.001	-0.001	0.344	0.024	-0.001	-0.001
31	07/29/19	0.217	17.54	1.450	0.015	0.045	0.015	-0.332	0.015	0.045	0.002	0.439	0.049	0.051	0.107
32	06/07/19	0.109	13.10	1.463	-0.006	0.040	-0.006	-0.091	0.331	-0.009	-0.023	0.090	0.037	0.037	0.090
32	10/08/19	0.250	13.35	1.668	-0.030	0.044	-0.030	-0.042	0.318	-0.012	-0.020	0.079	0.042	0.042	0.079
33	04/10/19	-0.033	19.49	1.330	-0.013	0.026	-0.013	0.079	0.183	0.013	0.014	0.055	0.024	0.024	0.055
33	12/11/19	0.080	12.22	1.377	0.008	0.027	0.008	0.080	0.227	-0.004	-0.005	0.065	0.030	0.030	0.065
34	04/10/19	0.112	15.15	1.151	0.010	0.022	0.010	-0.024	0.149	-0.012	0.066	0.050	0.021	0.021	0.050
34	12/11/19	0.123	12.03	1.306	0.012	0.030	0.012	0.071	0.294	0.011	-0.048	0.078	0.035	0.035	0.078
37C	03/12/19	-0.159	14.68	1.277	-0.024	0.026	-0.024	0.065	0.265	-0.002	0.054	0.068	0.028	0.028	0.068
37C	08/08/19	0.209	13.74	1.521	0.022	0.063	0.022	0.215	0.551	-0.011	-0.141	0.099	0.053	0.053	0.099

LOCATION	COLLECTION DATE	COLLECTION									
		Co-60 (+/-)	Zn-65 (+/-)	Nb-95 (+/-)	Zr-95 (+/-)	Ru-103 (+/-)	Ru-106 (+/-)				
31	03/12/19	-0.004	-0.122	-0.011	0.067	0.009	-0.177				
31	07/29/19	0.019	0.082	0.042	0.030	-0.008	-0.186				
32	06/07/19	-0.037	-0.007	-0.006	0.066	-0.026	0.328				
32	10/08/19	0.002	-0.067	0.038	0.048	-0.022	0.383				
33	04/10/19	0.017	-0.045	-0.008	0.036	0.003	0.217				
33	12/11/19	0.008	-0.146	-0.020	0.022	-0.015	0.267				
34	04/10/19	-0.011	-0.060	-0.001	-0.007	0.000	0.168				
34	12/11/19	0.028	-0.285	0.008	0.011	-0.012	0.292				
37C	03/12/19	0.008	-0.015	0.018	0.036	-0.005	0.243				
37C	08/08/19	0.022	-0.115	0.016	0.034	-0.073	0.520				

C= Control location, Background location
Results in bold type are positive.

TABLE 11
BOTTOM SEDIMENT
(pCi/g dry wt.)

LOCATION	COLLECTION DATE	Ag-110M		Sb-125		I-131		Cs-134		Cs-137		Ac-228	
		(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)	(+/-)
31	03/12/19	0.001	0.035	0.017	0.105	-0.039	0.079	0.178	0.070	-0.019	0.039	0.124	0.363
31	07/29/19	0.005	0.049	-0.031	0.139	-0.023	0.065	0.100	0.051	0.058	0.053	0.077	0.358
32	06/07/19	0.007	0.033	0.010	0.085	0.007	0.082	0.072	0.044	-0.001	0.037	0.111	0.338
32	10/08/19	-0.002	0.038	0.006	0.104	0.014	0.046	0.072	0.050	0.006	0.041	0.042	0.342
33	04/10/19	-0.008	0.025	0.011	0.060	-0.029	0.033	0.028	0.029	-0.004	0.030	0.012	0.202
33	12/11/19	-0.014	0.029	0.016	0.065	0.054	0.050	0.030	0.027	0.006	0.032	0.345	0.191
34	04/10/19	0.000	0.017	-0.027	0.051	-0.010	0.027	0.002	0.022	-0.007	0.018	0.028	0.085
34	12/11/19	-0.014	0.037	0.050	0.090	-0.039	0.063	-0.023	0.037	0.014	0.041	0.072	0.148
37C	03/12/19	0.004	0.025	0.023	0.073	-0.004	0.059	0.033	0.028	-0.016	0.029	0.225	0.131
37C	08/08/19	-0.003	0.060	-0.062	0.161	0.004	0.092	0.290	0.098	0.013	0.068	1.112	0.650

C= Control location, Background location

TABLE 12
AQUATIC FLORA - FUCUS
(pCi/g wet wt.)

LOCATION	COLLECTION						
	DATE	Be-7 (+/-)	K-40 (+/-)	Cr-51 (+/-)	Mn-54 (+/-)	Co-58 (+/-)	Fe-59 (+/-)
29	03/14/19	0.3133	4.8870	0.0703	0.0035	-0.0107	-0.0183
29	06/13/19	0.0511	4.8820	0.0099	0.0036	-0.0022	0.0077
29	08/20/19	0.3347	6.1800	-0.0683	0.0044	0.0127	0.0155
29	12/09/19	0.3144	6.1320	-0.0115	-0.0027	-0.0005	0.0046
32	03/14/19	0.1312	6.2440	0.0589	-0.0019	0.0071	0.0030
32	06/17/19	0.1177	6.5190	-0.0653	-0.0076	0.0019	-0.0082
32	08/20/19	0.2175	9.3060	-0.0651	0.0073	-0.0055	-0.0033
32	10/23/19	0.0582	8.5310	-0.0881	0.0113	-0.0141	0.0062
35	03/14/19	0.0999	5.8840	-0.1765	0.0066	0.0054	0.0182
35	06/11/19	0.1143	7.3610	-0.0343	0.0046	0.0086	-0.0125
35	08/20/19	0.2227	6.6340	0.0748	-0.0045	0.0013	-0.0102
35	12/09/19	0.1247	6.4270	0.0270	0.0048	0.0059	-0.0053
36C	03/12/19	0.3336	5.8830	0.0141	-0.0015	0.0078	0.0107
36C	06/25/19	0.2867	5.1410	-0.1349	0.0031	-0.0020	-0.0140
36C	08/08/19	0.4402	6.7180	-0.0979	-0.0094	-0.0016	0.0025
36C	12/18/19	0.2184	6.7950	-0.0168	-0.0040	-0.0031	0.0083

C= Control location, Background location
Results in bold type are positive.

TABLE 12
AQUATIC FLORA - FUCUS
(pCi/g wet wt.)

LOCATION	COLLECTION					I-131 (+/-)	Cs-134 (+/-)	Cs-137 (+/-)	Ac-228 (+/-)
	DATE	Ag-110M (+/-)	Sb-125 (+/-)	Ag-110M (+/-)	I-131 (+/-)				
29	03/14/19	0.0092	-0.0047	0.0335	-0.0007	0.0206	-0.0017	0.0143	0.0241
29	06/13/19	-0.0035	0.0145	0.0224	-0.0086	0.0133	0.0011	0.0121	0.0736
29	08/20/19	-0.0017	0.0280	0.0333	-0.0018	0.0198	0.0050	0.0147	0.0187
29	12/09/19	0.0017	-0.0076	0.0217	-0.0021	0.0115	0.0063	0.0110	0.0747
32	03/14/19	-0.0020	0.0211	0.0389	0.0132	0.0219	-0.0012	0.0155	0.0445
32	06/17/19	0.0005	-0.0056	0.0332	0.0138	0.0134	0.0008	0.0138	0.0426
32	08/20/19	-0.0036	-0.0136	0.0390	-0.0016	0.0283	-0.0017	0.0172	0.0712
32	10/23/19	-0.0146	-0.0128	0.0343	0.0049	0.0232	0.0028	0.0157	0.0742
35	03/14/19	0.0055	0.0189	0.0396	0.0096	0.0253	-0.0051	0.0186	0.0630
35	06/11/19	0.0002	-0.0244	0.0240	0.0047	0.0161	-0.0004	0.0120	0.0422
35	08/20/19	-0.0148	0.0002	0.0375	0.0074	0.0263	-0.0108	0.0162	0.0046
35	12/09/19	-0.0023	-0.0070	0.0286	0.0109	0.0131	0.0049	0.0119	0.0675
36C	03/12/19	0.0024	-0.0186	0.0296	0.0143	0.0182	0.0004	0.0109	0.0834
36C	06/25/19	-0.0125	-0.0077	0.0427	-0.0032	0.0160	0.0077	0.0139	0.0758
36C	08/08/19	-0.0157	0.0156	0.0416	0.0114	0.0222	0.0073	0.0202	0.1095
36C	12/18/19	-0.0003	0.0268	0.0329	-0.0040	0.0127	0.0058	0.0131	0.0927

C= Control location, Background location

TABLE 13
FISH
(pCi/g wet wt.)

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Be-7</u> (+/-)	<u>K-40</u> (+/-)	<u>Cr-51</u> (+/-)	<u>Mn-54</u> (+/-)	<u>Co-58</u> (+/-)	<u>Fe-59</u> (+/-)
32	04/17/19	-0.099	2.924	-0.085	0.012	-0.007	-0.029
32	10/23/19	-0.072	4.737	-0.130	0.002	0.003	-0.014
35	05/15/19	0.022	3.060	-0.072	0.002	-0.003	-0.006
35	08/06/19	0.170	2.647	0.200	0.020	-0.049	-0.055
		0.290	0.939	0.331	0.034	0.032	0.062
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Co-60</u> (+/-)	<u>Zn-65</u> (+/-)	<u>Nb-95</u> (+/-)	<u>Zr-95</u> (+/-)	<u>Ru-103</u> (+/-)	<u>Ru-106</u> (+/-)
32	04/17/19	0.012	-0.096	0.018	0.027	0.001	-0.081
32	10/23/19	0.007	-0.130	-0.017	0.035	0.035	0.305
35	05/15/19	0.017	-0.037	0.006	-0.020	0.017	-0.070
35	08/06/19	0.005	-0.010	-0.013	-0.014	0.021	0.062
		0.029	0.089	0.037	0.061	0.037	0.330
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Ag-110M</u> (+/-)	<u>Sb-125</u> (+/-)	<u>I-131</u> (+/-)	<u>Cs-134</u> (+/-)	<u>Cs-137</u> (+/-)	<u>Ac-228</u> (+/-)
32	04/17/19	-0.008	0.031	-0.015	-0.006	-0.001	-0.098
32	10/23/19	0.007	0.026	0.028	-0.018	0.008	0.157
35	05/15/19	-0.015	-0.024	0.012	-0.022	0.004	0.035
35	08/06/19	0.004	-0.002	-0.025	0.007	-0.014	-0.040
		0.031	0.099	0.056	0.039	0.037	0.135

Results in bold type are positive.

TABLE 14
OYSTERS
(pCi/g wet wt.)

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Be-7</u> (+/-)	<u>K-40</u> (+/-)	<u>Cr-51</u> (+/-)	<u>Mn-54</u> (+/-)	<u>Co-58</u> (+/-)	<u>Fe-59</u> (+/-)
31	05/30/19	-0.139	0.785	-0.075	0.286	-0.023	0.035
31	11/05/19	0.054	0.862	0.115	0.264	0.006	0.037
89C	03/28/19	0.101	0.768	0.199	0.240	-0.023	0.030
89C	10/29/19	-0.240	1.007	0.186	0.373	0.017	0.041
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Co-60</u> (+/-)	<u>Zn-65</u> (+/-)	<u>Nb-95</u> (+/-)	<u>Zr-95</u> (+/-)	<u>Ru-103</u> (+/-)	<u>Ru-106</u> (+/-)
31	05/30/19	-0.008	0.033	-0.004	0.032	-0.016	0.030
31	11/05/19	0.021	0.028	0.001	0.037	0.024	0.030
89C	03/28/19	-0.004	0.025	0.007	0.031	-0.017	0.031
89C	10/29/19	0.008	0.052	0.020	0.041	-0.057	0.049
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Ag-110M</u> (+/-)	<u>Sb-125</u> (+/-)	<u>I-131</u> (+/-)	<u>Cs-134</u> (+/-)	<u>Cs-137</u> (+/-)	<u>Ac-228</u> (+/-)
31	05/30/19	0.000	0.027	0.018	0.073	0.000	0.029
31	11/05/19	-0.012	0.027	-0.011	0.046	0.023	0.033
89C	03/28/19	0.001	0.027	0.036	0.046	0.009	0.027
89C	10/29/19	0.030	0.043	-0.023	0.048	0.008	0.052

Results in bold type are positive.
C= Control location, Background location

TABLE 15
CLAMS
(pCi/g wet wt.)

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Be-7</u> (+/-)	<u>K-40</u> (+/-)	<u>Cr-51</u> (+/-)	<u>Mn-54</u> (+/-)	<u>Co-58</u> (+/-)	<u>Fe-59</u> (+/-)
29	06/12/19	0.064	1.539	-0.037	-0.003	-0.004	0.005
29	10/16/19	0.040	1.718	0.106	0.004	-0.026	-0.033
31	06/07/19	-0.137	1.573	0.234	0.021	0.006	-0.029
31	10/16/19	0.134	1.435	0.007	-0.014	0.034	0.028
		0.282	1.053	0.235	0.038	0.033	0.046
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Co-60</u> (+/-)	<u>Zn-65</u> (+/-)	<u>Nb-95</u> (+/-)	<u>Zr-95</u> (+/-)	<u>Ru-103</u> (+/-)	<u>Ru-106</u> (+/-)
29	06/12/19	-0.016	-0.048	0.024	-0.006	-0.016	0.049
29	10/16/19	0.050	-0.037	-0.025	-0.017	0.002	0.101
31	06/07/19	0.006	0.023	0.011	0.015	0.017	-0.208
31	10/16/19	-0.001	0.011	-0.005	-0.022	0.032	-0.123
		0.041	0.080	0.033	0.055	0.033	0.293
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Ag-110M</u> (+/-)	<u>Sb-125</u> (+/-)	<u>I-131</u> (+/-)	<u>Cs-134</u> (+/-)	<u>Cs-137</u> (+/-)	<u>Ac-228</u> (+/-)
29	06/12/19	-0.016	0.031	0.019	-0.008	0.017	0.000
29	10/16/19	-0.001	0.035	0.050	0.032	0.032	-0.044
31	06/07/19	-0.008	0.073	-0.070	0.005	0.028	0.005
31	10/16/19	-0.010	0.015	0.005	0.009	0.028	0.018
		0.031	0.089	0.037	0.041	0.034	0.133

TABLE 16
LOBSTERS
(pCi/g wet wt.)

<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Be-7</u> (+/-)	<u>K-40</u> (+/-)	<u>Cr-51</u> (+/-)	<u>Mn-54</u> (+/-)	<u>Co-58</u> (+/-)	<u>Fe-59</u> (+/-)
35	05/20/19	0.109	2.435	0.255	-0.021	-0.031	-0.029
35	08/06/19	-0.095	2.879	-0.107	0.015	-0.010	0.039
89C	06/25/19	0.028	2.446	-0.009	0.001	0.007	0.000
89C	08/08/19	0.110	3.117	0.116	0.013	-0.001	-0.018
		0.237		0.221	0.034	0.036	0.062
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Co-60</u> (+/-)	<u>Zn-65</u> (+/-)	<u>Nb-95</u> (+/-)	<u>Zr-95</u> (+/-)	<u>Ru-103</u> (+/-)	<u>Ru-106</u> (+/-)
35	05/20/19	-0.008	-0.215	0.021	-0.013	-0.001	-0.169
35	08/06/19	0.010	-0.041	0.009	0.008	-0.015	-0.018
89C	06/25/19	0.009	0.042	0.000	0.024	-0.012	0.113
89C	08/08/19	0.008	-0.129	-0.003	0.019	0.003	0.074
		0.040	0.087	0.027	0.057	0.032	0.263
<u>LOCATION</u>	<u>COLLECTION DATE</u>	<u>Ag-110M</u> (+/-)	<u>Sb-125</u> (+/-)	<u>I-131</u> (+/-)	<u>Cs-134</u> (+/-)	<u>Cs-137</u> (+/-)	<u>Ac-228</u> (+/-)
35	05/20/19	-0.033	-0.015	0.006	-0.010	0.019	0.012
35	08/06/19	-0.008	-0.014	0.009	-0.008	0.007	-0.037
89C	06/25/19	0.011	0.039	-0.001	0.004	-0.029	-0.062
89C	08/08/19	-0.016	-0.029	0.002	-0.011	0.007	0.004
		0.025	0.072	0.034	0.032	0.029	0.112

C= Control Location, Background location
Results in bold type are positive.

4. DISCUSSION OF RESULTS

This section summarizes the results of the analyses on the REMP samples. The only case where station related radioactivity was detected was tritium (H-3) in seawater collected at the quarry discharge point. This was within the station boundary. The naturally occurring nuclides of Be-7, K-40, and Ac-228 were detected in some samples. Be-7 is from cosmic radiation. It was observed in air and broadleaf vegetation and in some fucus samples. K-40 and Ac-228 are two common terrestrial isotopes. K-40 was not seen in air or well water samples but was observed in almost every other type of sample. Ac-228 was observed in one sediment. Cs-137 and Sr-90 from atmospheric nuclear weapons testing in the 1960's have been observed in the past. A study by the Connecticut Department of Energy and Environmental Protection in 2006 affirmed that radioactivity from nuclear weapons testing has decreased to almost non-detectable levels (Reference 19). Since 2006 detection of Cs-137 and Sr-90 in environmental samples has been rare. During 2019, there were three soil samples that detected Cs-137 just above the LLD. Based on sample location, it is not unexpected to identify the presence of Cs-137 in undisturbed soil²². The remaining REMP samples obtained during 2019 did not indicate the presence of Cs-137 and the overall trend is decreasing (Figure 4.5-1).

4.1 Gamma Exposure Rate (Table 1)

Gamma exposure rate is determined from the integrated exposure measured over a calendar quarter using TLDs. Prior to 1990, Victoreen CaF₂(Mn) glass bulb dosimeters were used for these measurements. In 1990, these were replaced by Harshaw CaF₂(Mn) chips. In 2000, the CaF₂(Mn) TLDs, were replaced with the CaSO₄(Tm) Panasonic model UD-804 ASx TLDs. Readings are recorded as $\mu\text{R/hr}$. The unit μR stands for 'micro-roentgen' with a 'micro' being one-millionth of a roentgen. A roentgen is the quantity of radiation equal to 87.6 ergs of energy per gram of air. For gamma exposure a micro-roentgen is equivalent to a micro-rem, a measure of dose to man.

The dosimeters are strategically placed at a number of onsite locations, as well as at inner and outer offsite locations. Starting in 2001, the collection of TLDs was changed from monthly to quarterly and additional measurement locations were incorporated into the REMP requirements listed in the REMODCM (Reference 8). Three more locations (73-75) were added in mid-2003 to prepare for monitoring the potential effect from the ISFSI. Two Dry Cask Containers were loaded in the first quarter 2005. Three containers were loaded in 2006, three in 2007, three in 2009, three in 2010, seven in 2015, six in 2016, three in 2018, seven in 2019.

Prior to any cask loading, the background readings average recorded from mid 2003 – 2004 were: 9.5 $\mu\text{R}/\text{hour}$ at Location 73, 7.5 $\mu\text{R}/\text{hour}$ at Location 74, and 6.9 $\mu\text{R}/\text{hour}$ at Location 75.

In 2019, the exposure rate measurement at Location 73 remains below the recorded background measurements, while Location 74 and Location 75 remain same. In 2019, the station offsite dose from ISFSI was 0.037 mrem/year, which is below the 25 mrem/year limit per 40.190 CFR.

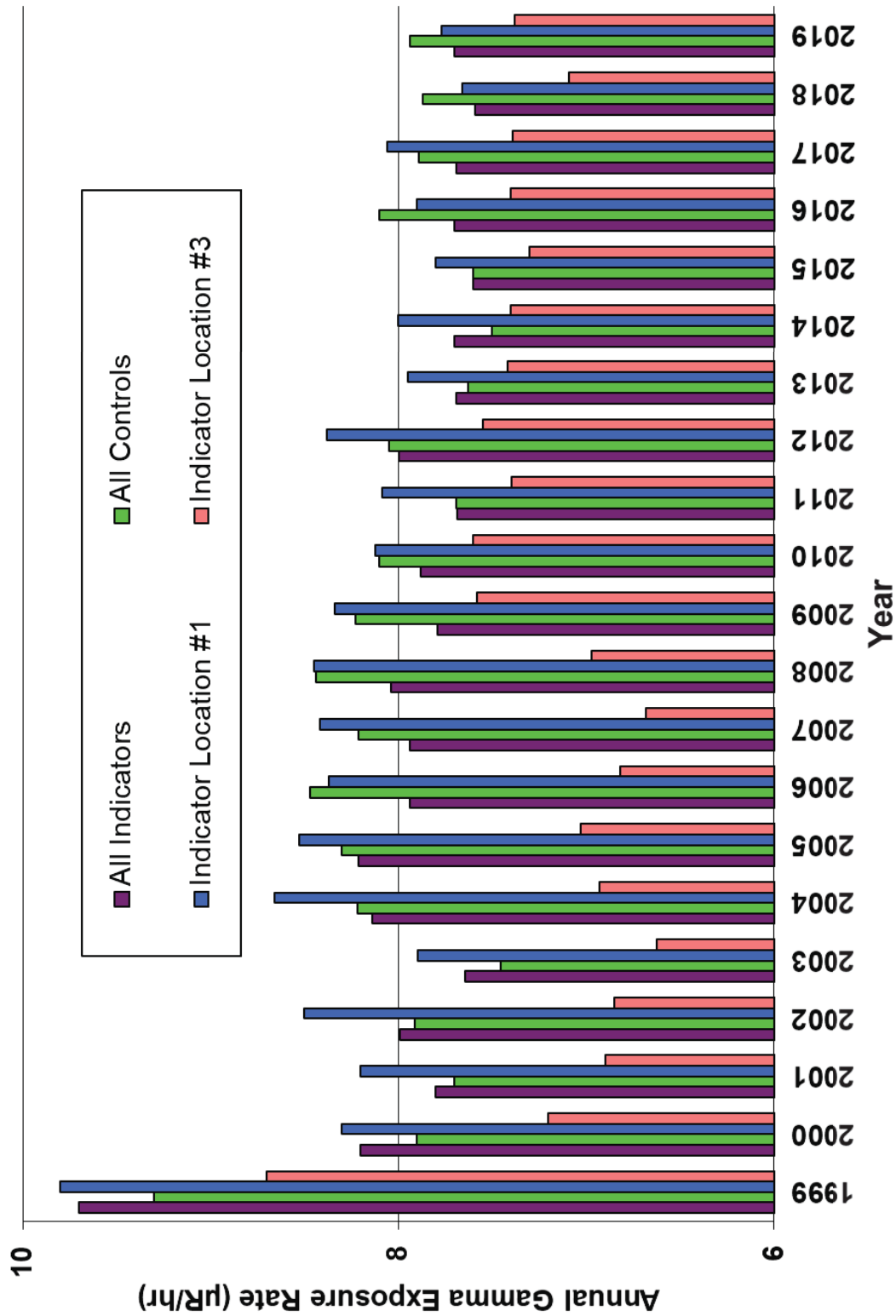
Table 1 in Section 3.2 lists the exposure rate measurements for all 43 monitored locations. These measurements demonstrate the general variations in background radiation between the various onsite and offsite locations and include gamma exposure from all sources of radioactivity. For example, the Weather Shack (Location 2), Quarry East (Location 5), Environmental Laboratory (Location 8), Bay Point Beach (Location 9), Goshen Fire Dept (Location 10), Corey Road (Location 48), and Site Switchyard Fence (Location 73) experience higher exposure rates due to their proximity to granite beds and stonewalls. In addition, the Mystic (Location 13C) and Ledyard (Location 14C) control locations experience relatively higher background exposure rate than the other control locations in Norwich and Old Lyme (Locations 15C and 16C).

Figure 4.1-1 shows a historical trend of TLD exposure rate measurements, comparing an annual average of all indicator TLDs, an annual average of all control TLDs, and the annual average of the two most critical indicator locations which are used to represent the two closest site boundary residences in the North-northwest and Northeast directions. The average indicator and control readings were both about 8.0 $\mu\text{R}/\text{hour}$.

The averages of all indicator locations for the period when Millstone MPS1 was still in operation (1996 to 1999) exhibit the effects of N-16 BWR turbine building skyshine to immediate areas onsite. Skyshine exposure rates are as high as 6 $\mu\text{R}/\text{hr}$ at onsite monitoring stations. The elevated exposure rates from skyshine decreased rapidly with distance to levels indistinguishable from normal background measurements at the nearest offsite monitoring stations. Also apparent in Figure 4.1-1 is a change of the type of TLD dosimeter in the year 2000. The difference in response between the two types of TLD dosimeters is apparent, with the new type reading 15% to 20% lower. This lower response is consistent for all locations, including both indicator and control locations.

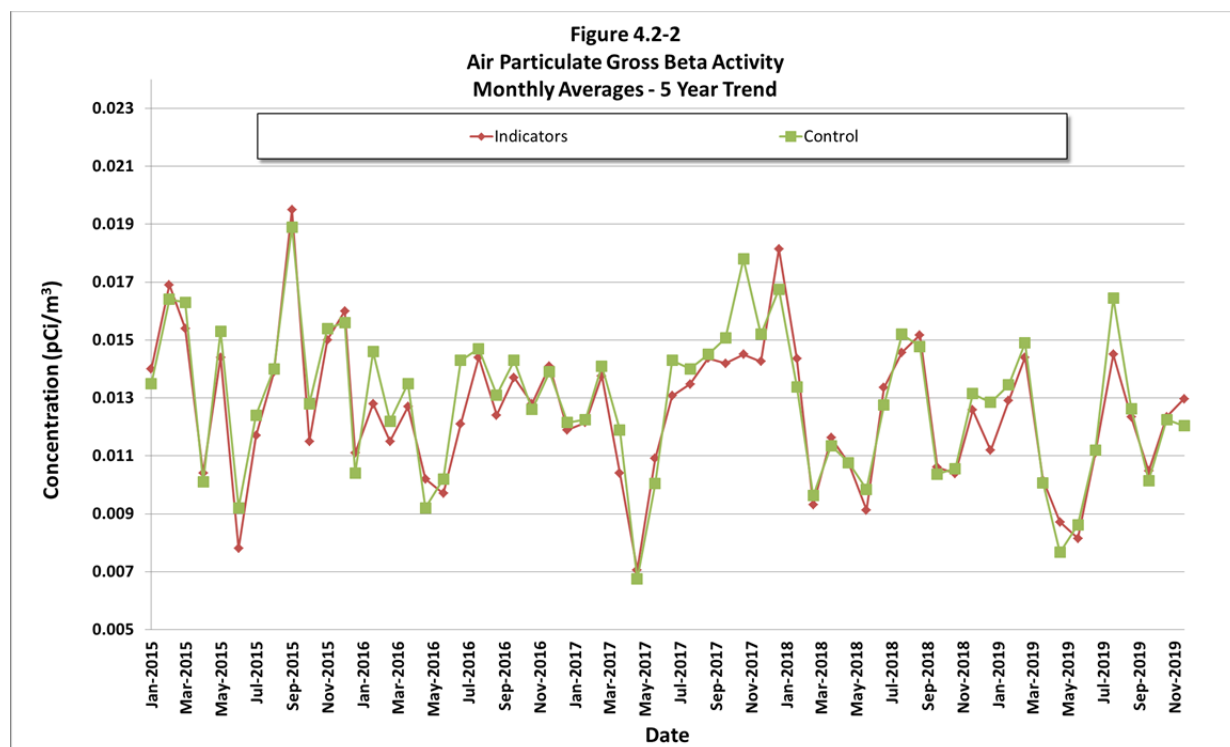
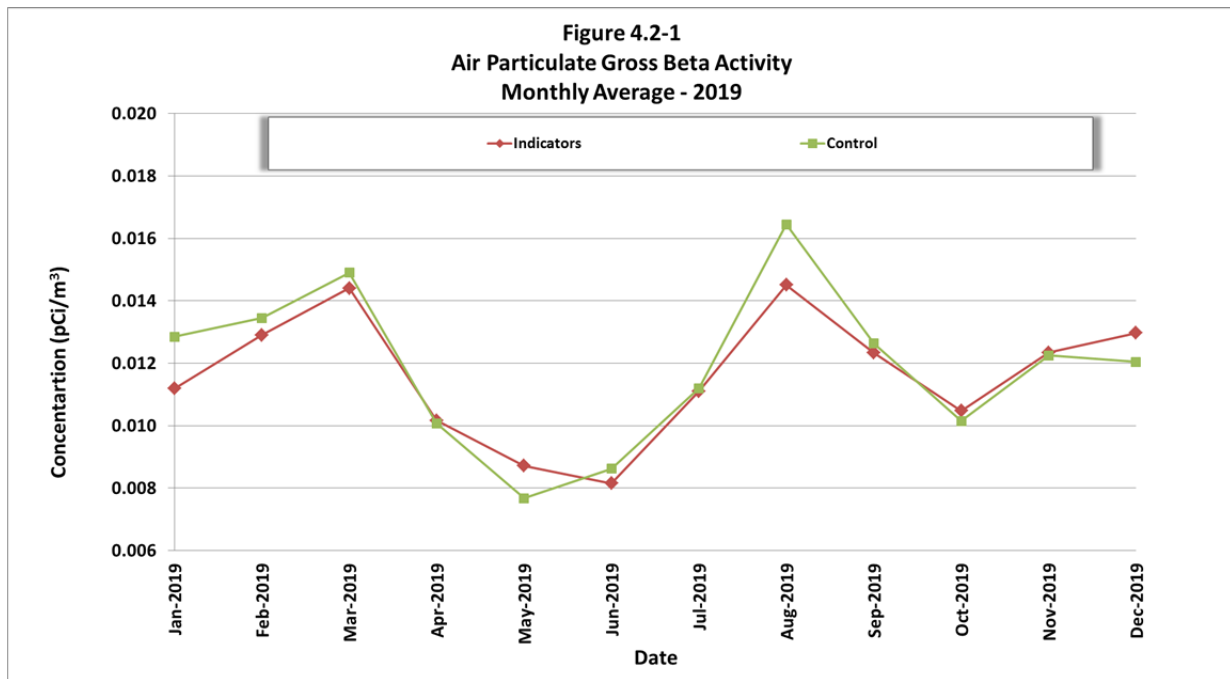
Figure 4.1-1 also relates the difference in indicator locations 1 and 3 and the annual average of all indicator TLDs to the annual average of the control TLDs collected and measured during coincident periods throughout the year. Locations 1 and 3 are important because they are onsite and located between the plant and nearby populated areas. As discussed earlier, the exposure measurements of many indicator locations onsite (and two of the control locations) are influenced by natural background exposure differences caused by the many granite outcroppings typical of the local area. Figure 4.1-1 shows that the annual average at indicator Location 3 was lower in gamma exposure rate than the average control gamma exposure rate. These differences are the result of the differences in granite at these locations. Location 3 was moved in the second quarter 2009 to minimize the effect of tree covering for the air sampler also located at this location. The 2009 to 2019 data for Location 3 shows an increase likely attributable to 1-3 $\mu\text{R}/\text{hr}$ gradients observed from the granite bedrock of the MPS Site²¹.

**Figure 4.1-1
 Annual Gamma Exposure Rate - 20 Year History**



4.2 Air Particulate Gross Beta Radioactivity (Table 2)

Air is continuously sampled at seven inner ring (0 to 2 miles) locations and one control location (14 miles N) by passing it through glass fiber particulate filters. These samples are collected every two weeks and analyzed for gross beta radioactivity. Results are shown on Figure 4.2-1 and Table 2. Gross beta activity remained at levels similar to that seen over the last decade. Indicators and control monitoring locations continue to show no significant variation in measured activities (see Figure 4.2-2). This indicates that any station contribution is not measurable.



4.3 Airborne Iodine (Table 3)

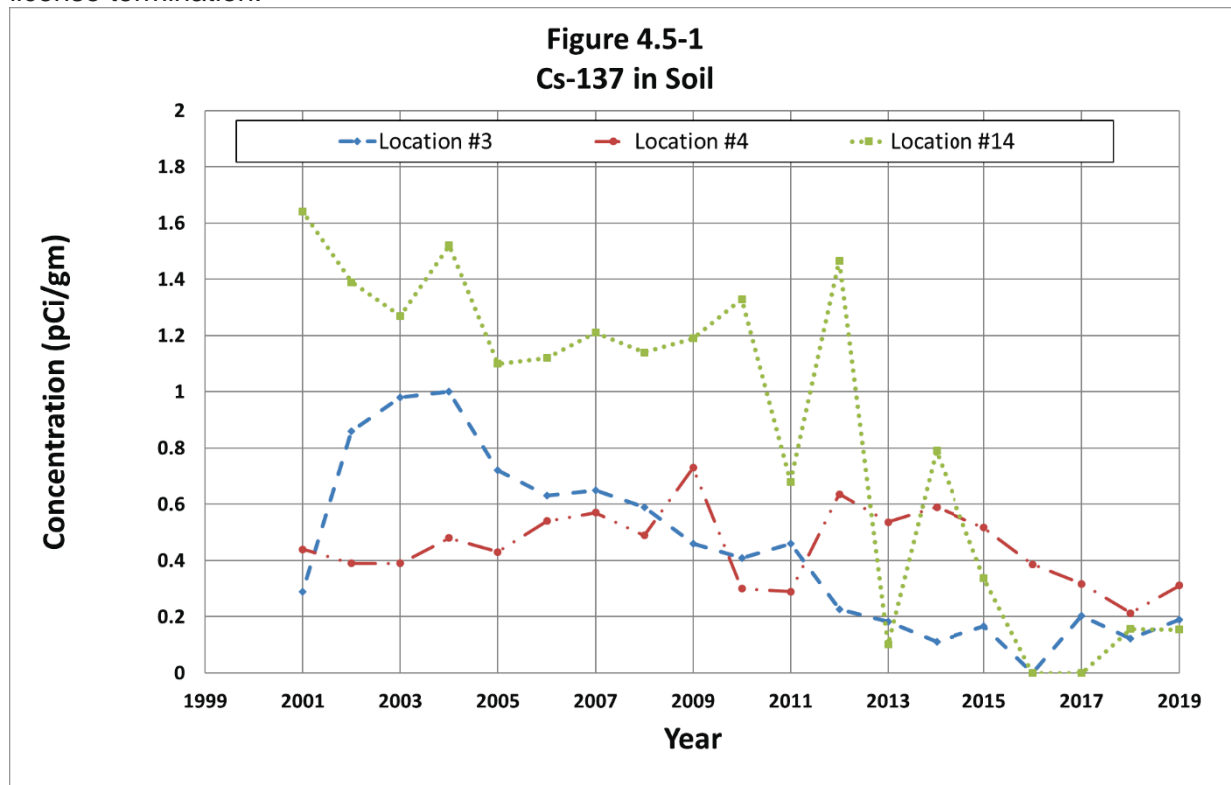
Charcoal cartridges are included at all of the air particulate monitoring stations for the collection of atmospheric iodine. These cartridges were analyzed for I-131 every two weeks. No detectable levels of I-131 were seen in the 2019 charcoal samples.

4.4 Air Particulate Gamma (Table 4)

The air particulate samples that are utilized for the gross beta analyses are composited quarterly and analyzed for gamma emitting isotopes including strontium analysis as a substitute for milk analysis. The results, as shown in Table 4, indicate the presence of naturally occurring Be-7, which is produced by cosmic radiation. No other positive results are seen. These analyses indicate the lack of any station radioactivity.

4.5 Soil (Table 5)

This media is collected annually from one control and two indicator locations. MPS has collected and analyzed soil since 2001. Prior to 2001, soil had not been sampled for over fifteen years because station related detectable activity had not been detected. Since 2001 no station detectable activity has been seen in these samples. Naturally occurring K-40 and Ac-228 is detected in soil. Cs-137 from nuclear weapons testing was detected in two soil samples. The results of these samples, allows for the determination of baseline activity levels in soil. This is particularly important for Cs-137, since significant levels from past weapons testing fallout remain in the soil. Figure 4.5-1 shows the trend of Cs-137 in soil samples, the trend appears to be declining with time. Baseline levels should be useful in the future, when site characterization and decommissioning of the station become the focus during preparations for license termination.



4.6 Milk (Table 6)

Each year the Land Use Census is used to identify locations of milk animals that should be included in the monitoring program. It is performed annually and is maintained by observations, door-to-door surveys and consulting with local agriculture authorities. The 2019 census is listed in Appendix A. If a new dairy farm is identified close enough to MPS to be considered an indicator location, the collection of cow milk at that location would be added.

In 2019, the Land Use Census did not locate any location of milk animals within 10 miles of Millstone Power Station. Prior to 2018, milk samples were obtained and analyzed for strontium from a farm that is no longer producing milk. A valid substitute for milk analysis is air filters strontium analysis and gamma analysis of broadleaf vegetation. This strontium analysis of air filter was determined to be more effective than milk analysis, MP-HPO-17067. The air sampling stations are located closer to the plant and in the predominant downwind direction.

4.7 Well Water (Table 7)

All REMP well samples including ISFSI well samples were less than the Lower Level of Detection Limit (LLD). Additional samples from other wells were obtained as part of the Groundwater Protection Program (GWPP). Results from the GWPP are reported in the MPS annual "Radioactive Effluent Release Report" for 2019. ISFSI well results have been documented in Table 7 as required by the Connecticut Sitting Council.

4.8 Fruits and Vegetables (Table 8)

Consistent with past years, this media did not show any station effects. Naturally occurring K-40 and cosmic produced Be-7 were detected in the samples.

4.9 Broad Leaf Vegetation (Table 9)

Consistent with past years, this media did not show any station effects. Most samples had detectable levels of cosmic produced Be-7 and naturally occurring K-40 at levels consistent with previous years. Occasionally these samples have indicated positive levels of Cs-137 in the past. This can be attributed to fallout from weapons testing which has been widespread in terrestrial samples for many years.

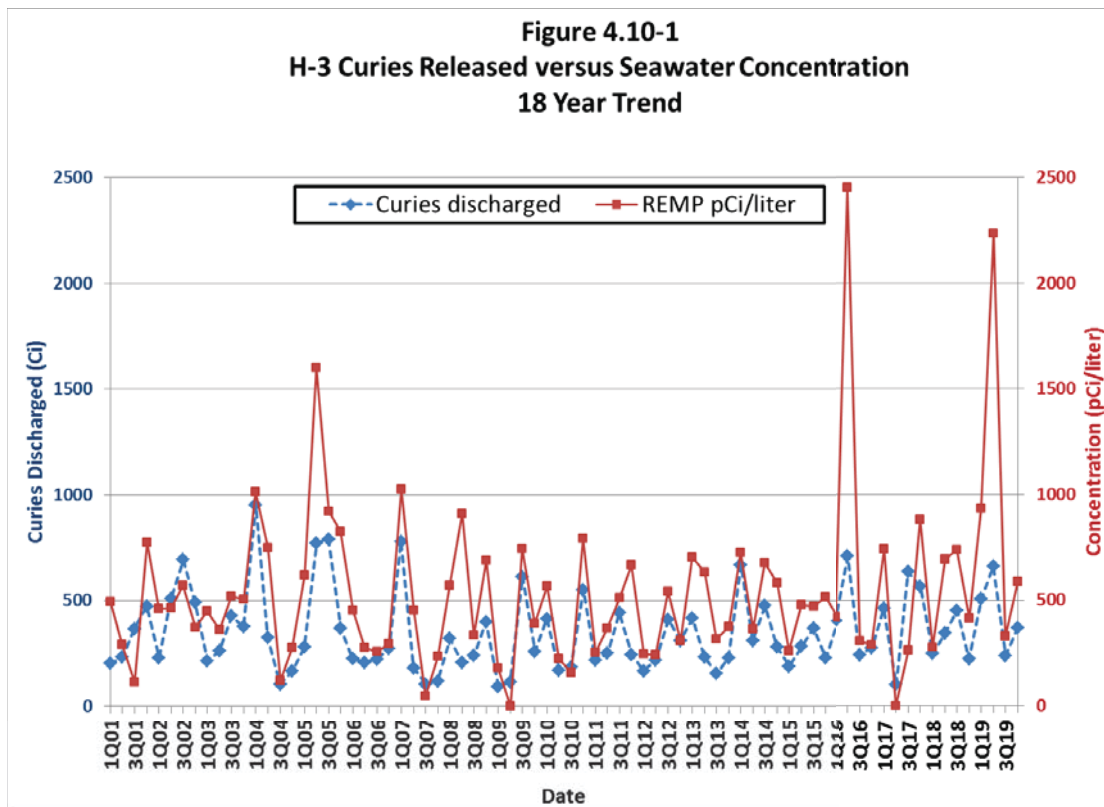
4.10 Seawater (Table 10)

The guidance in Reference 15 specifies one sample upstream (control – beyond significant influence of the discharge) and one sample downstream (indicator – beyond but near the mixing zone) for surface water samples. Historically the downstream sample for MPS has been located in the vicinity of discharge (Location 32) which is prior to the mixing zone. This location was chosen since it was readily accessible and not affected by cold weather conditions. Operation of an automatic sampler at the indicator location is necessary for providing a representative sample. Any dose consequences can be assessed by use of the appropriate dilution factors. It's not necessary to have a continuous sampler at the control location due to the historical relative consistency noted in seawater background activity near the Millstone.

A technician collects an aliquot from the automatic sampler at Location 32 on a weekly frequency. These samples are composited for monthly analyses. For the Control Location, Giant's Neck (Location 37C), six weekly grab samples are obtained for quarterly compositing.

Naturally occurring K-40 was the only detectable gamma activity seen in these samples. Measured station related levels of H-3, beta activity, in seawater from the vicinity of discharge (Location 32) were observed in most samples. Tritium releases are typically higher near outages due to the need for increased liquid processing during these times. As mentioned above, these samples are taken directly from liquid effluent flow prior to dilution into the Long Island Sound.

Tritium builds up in the reactor coolant during each fuel cycle. It is generated during station operation from fission and neutron reactions. Figure 4.10-1 shows an eighteen-year trend of H-3 releases in the MPS liquid effluents versus the measured environmental concentrations from the vicinity of discharge location. In 2019 MPS had one outage requiring the processing and subsequent discharge of processed refueling water, which explains the slightly elevated H-3 activity values in the second quarter of 2019. The highest quarterly average H-3 value in 2019 for seawater was 2,234 pCi/l, which is well below the drinking water limit established by the Environmental Protection Agency (EPA) of 20,000 pCi/l. The total annual exposure from the liquid discharge pathway for 2019 was 0.001 mrem/yr.



4.11 Bottom Sediment (Table 11)

There was no station related radioactivity detected in bottom sediment samples in 2019. Naturally occurring K-40 is seen in all samples and naturally occurring Ac-228 in some samples. Bottom sediment is not a significant dose pathway to man, especially at areas not typically used by the public.

4.12 Aquatic Flora (Table 12)

Aquatic flora is a sensitive indicator of low levels of man-made radioactivity (e.g., Mn-54, Co-58, Co-60, Zn-65, I-131 and Ag-110m) in the environment so it was added as a required sample at four locations in revision 28 of the REMODCM. Naturally occurring Be-7 appears in some samples as well as the naturally occurring K-40 in all samples. This analysis indicates the lack of any station radioactivity.

4.13 Fish (Table 13)

The activity in fish is the same as that seen in the past. No activity was observed except for the naturally occurring K-40.

4.14 Oysters (Table 14)

All locations utilize oysters stocked in trays. The stocked trays are kept at sampling areas and represent conditions in those areas. Due to safety concerns, Location #32 was moved over eight years ago to a more accessible area in the middle of the quarry. Although it is labeled as vicinity of the discharge, it was previously located at the end of the quarry. The near-field dilution factor for liquid discharges from the MPS Quarry discharge is a factor of 3. Obtaining oyster sampling has presented challenges in obtaining the sample size required for analysis. In 2019 there were no challenges in obtaining oyster samples and four samples were obtained.

Naturally occurring K-40 is seen in most samples. MPS related Ag-110m and Zn-65 in oysters collected at Location #32 have been seen in the past. Oysters have a high capacity for accumulating silver and zinc. Studies have shown that oysters can accumulate as much as 50 times or more the amount of zinc compared to most other seafood. As seen in the past, no plant related radioactivity was detected in oysters in 2019.

4.15 Clams (Table 15)

Occasionally this media indicates the presence of station related radioactivity. In 2019 no activity was observed except for the naturally occurring K-40.

4.16 Lobsters (Table 16)

In 2019 no activity was observed except for the naturally occurring K-40.

5. REFERENCES

- 1) United States of America, Code of Federal Regulations, Title 10, Part 50, Appendix A Criteria 64.
- 2) Donald T. Oakley, "Natural Radiation Exposure in the United States," U. S. Environmental Protection Agency, ORP/SID 72-1, June 1972.
- 3) National Council on Radiation Protection and Measurements, Report No. 160, "Ionizing Radiation Exposures of the Population of the United States," March 2009.
- 4) National Council on Radiation Protection and Measurements, Report No. 94, "Exposure of the Population of the United States and Canada from Natural Background Radiation," December 1987.
- 5) United States Nuclear Regulatory Commission, Regulatory Guide 8.29, "Instructions Concerning Risks from Occupational Radiation Exposure," Revision 0, July 1981.
- 6) United States of America, Code of Federal Regulations, Title 10, Part 20.1302.
- 7) United States Nuclear Regulatory Commission, 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.
- 8) Millstone Power Station Radiological Effluent Monitoring and Offsite Dose Calculation Manual, Revision 30, September 19, 2018
- 9) Millstone Nuclear Power Station Unit 1 Defueled Technical Specifications.
- 10) Millstone Nuclear Power Station Unit 2 Technical Specifications, License No. DPR-65.
- 11) Millstone Nuclear Power Station Unit 3 Technical Specifications, License No. NPF-49.
- 12) United States Nuclear Regulatory Commission, Regulatory Guide 4.1, "Program for Monitoring Radioactivity in the Environs of Nuclear Power Plants," Rev. 1, April 1975.
- 13) ICN/TracerLab, "Millstone Nuclear Power Station Pre-operational Environmental Radiation Survey Program, Quarterly Reports," April 1967 to June 1970.
- 14) International Commission of Radiological Protection, Publication No. 43, "Principles of Monitoring for the Radiation Protection of the Population," May 1984.
- 15) United States Nuclear Regulatory Commission, NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors," April 1991.
- 16) United States Nuclear Regulatory Commission, Branch Technical Position, "An Acceptable Radiological Environmental Monitoring Program," Rev. 1, November 1979.
- 17) Reassessment of Millstone Power Station's Environmental Monitoring Data, Connecticut Department of Environmental Protection, Division of Radiation, March 2006.
- 18) Nuclear Regulatory Commission Regulatory Guide 4.1, Radiological Environmental Monitoring for Nuclear Power Plants, Revision 2, June 2009.
- 19) Division of Radiation, CT Dept. of Energy and Environmental Protection, "Reassessment of Millstone Power Station's Environmental Monitoring Data," January, 2006.
- 20) Connecticut Siting Council Decision and Order for ISFSI, Docket No. 265, May 27, 2004.
- 21) RP-16-08, "Take-Home Thermoluminescent Dosimeter Variance," June 17, 2016.
- 22) MP-HPO-98137, "Determination Of Cs-137 In Undisturbed Soil At Locations Greater Than 10 Miles From Millstone Site," July 28, 1998.

APPENDIX A

LAND USE CENSUS FOR 2019

The annual land use census in the vicinity of MPS was conducted as required by the MPS REMODCM. Table A-1 is a list of closest residents in each of twelve over-land compass sectors around Millstone. The list of residents was determined by a survey of properties around Millstone using Google Earth and verified by a field survey. It was assumed that the closest resident was also the closest garden. No changes from the 2018 closest resident list were identified

Table A-2 is a list of milk and other foods within ten miles of Millstone. Cow and goat milk producers were identified using the State of Connecticut Agriculture Department list of licensees and using American Dairy Goat Association (ADGA). There were no animals producing milk located within ten miles of Millstone Power Station. As a substitute for milk samples, strontium analysis of air filter and gamma analysis of broadleaf vegetation are being performed on quarterly basis.

Other sources of food were obtained from the Internet at <http://www.farmfresh.org> by searching for businesses closest to Waterford, CT. A search using Google Earth and field surveys were used to identify additional sources, Figure A-1. No changes from the 2018 sources of food locations were identified.

The 2019 Land Use Census also evaluated aquatic sampling exposure pathways from the fish and shell fish located around MPS. Figure A-2 shows shellfish beds around MPS from the Bureau of Aquaculture of the Department of Agriculture. The salt water fishing areas are identified Figure A-3. No changes from the 2018 aquatic sampling exposure pathways were identified.

The dose modeling incorporates the distances listed in Tables A-1, A-2.

TABLE A-1
2019 Survey

Downwind Direction	Resident/Garden ¹	
	miles	meters
N	0.95	1521
NNE	0.53	854
NE	0.47	763
ENE	0.97	1554
E	0.92	1475
ESE	1.06	1701
SE ²	N/A	N/A
SSE ²	N/A	N/A
S ²	N/A	N/A
SSW ²	N/A	N/A
SW	2.28	3670
WSW	1.95	3130
W	1.78	2858
WNW	1.51	2423
NW	1.35	2179
NNW	0.51	816

Notes:

1. No gardens located closer than resident.
2. Sectors SE thru SSW are N/A because they are over water.

Table A-2

Milk and other foods within Ten miles of Millstone - 2019

<u>Sector</u>	<u>Miles</u>	<u>Business</u>	<u>Location</u>	<u>Comments</u>
NW	1.95	Smith's Acres	Niantic	Fruits and vegetables
NE	1.96	Mingo Goat	Waterford	Has a goat but currently not producing milk
ENE	3.0	Secchiaroli Farms	Waterford	Has pigs but are fed non local sources
WNW	5.0	Four Mile River Farm	Old Lyme	Eggs, Meat
NW	5.2	Scott's Yankee Farmer	East Lyme	Fruits, vegetables, and cider
NNW	5.3	White Gate Farm	East Lyme	Vegetables, Herbs, Eggs, Meat, Nursery and Flowers
NNW	6.24	Trinity Farm	Enfield	Farmers Market
N	7.1	F.R.E.S.H Farm	Enfield	Fruit, Vegetables, Herbs
N	7.4	Hunts Brook Farm	Quaker Hill	Honey, Maple, Vegetables
ENE	6.8	LEVERETT Goat	Groton	Has a goat but not producing milk
ENE	7.5	Groton Family Farm	Groton	Vegetables, Honey, Maple, Eggs, Fiber
NE	8.3	Red Fence Farm	Groton	Fruits, vegetables, cows, goats, and pig. Cows and goats currently not producing milk

Figure A-1
Farms and Goats Products within ten miles of Millstone



Figure A-2
Shellfish Beds in Vicinity of Millstone

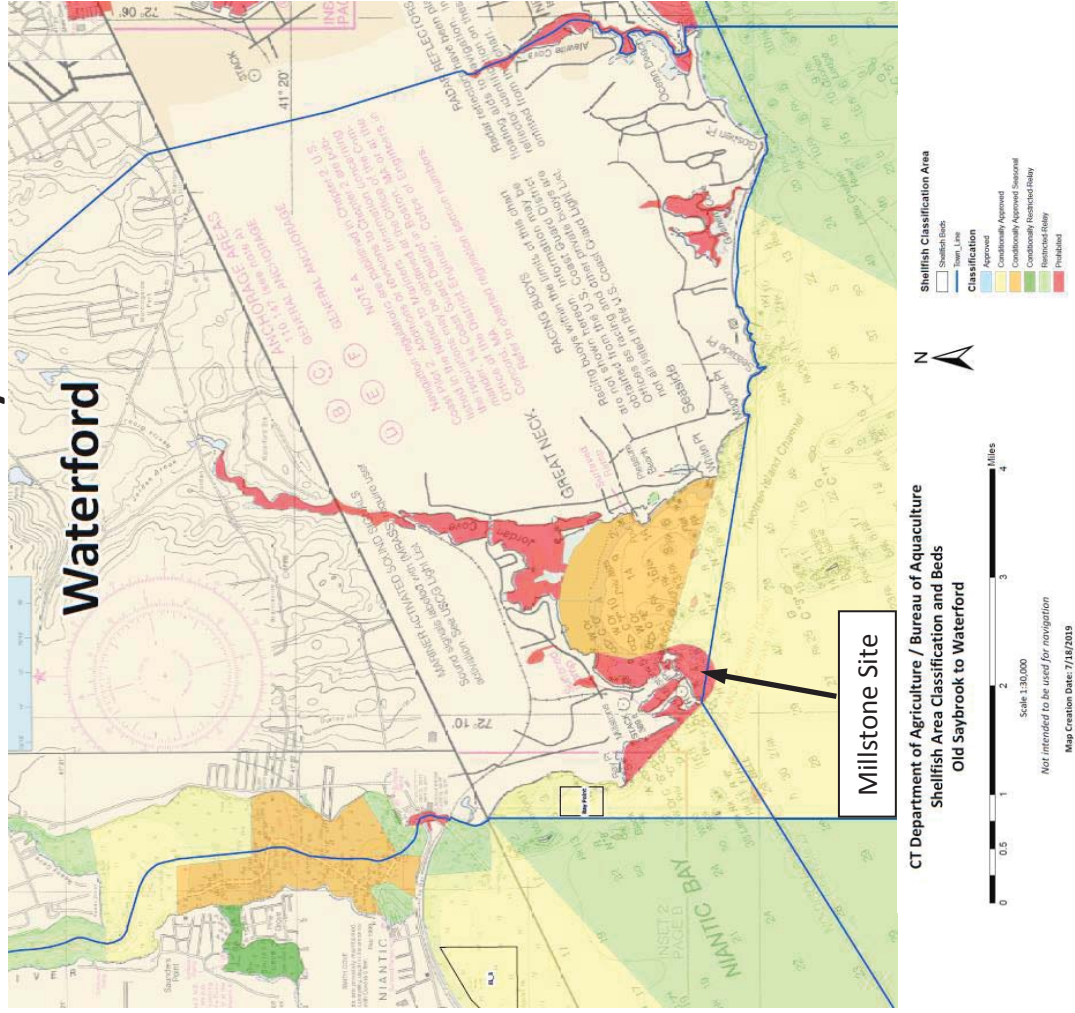
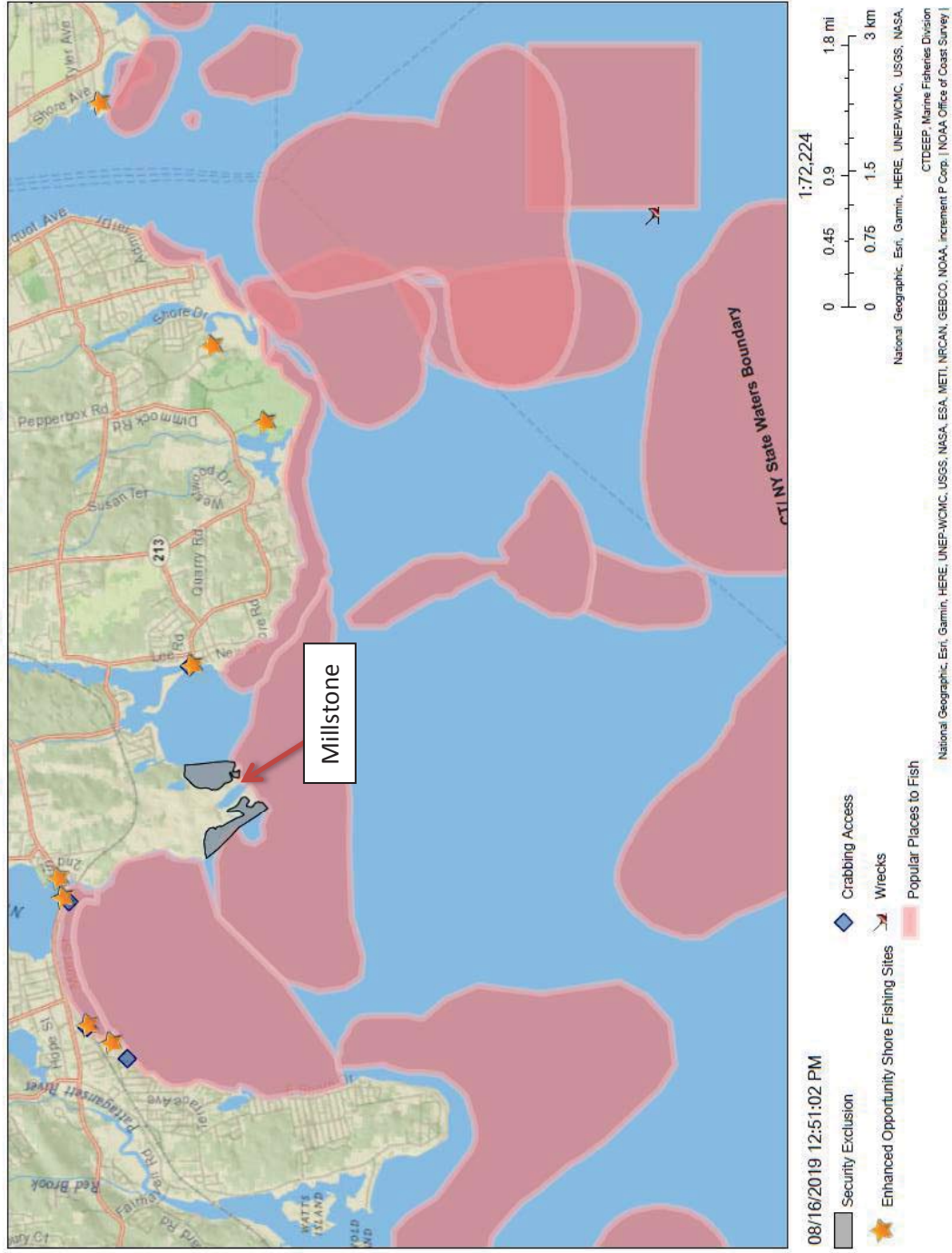


Figure A-3

Saltwater Fishing Resource Map



APPENDIX B

SUMMARY OF INTERLABORATORY COMPARISONS

Summary of Results – Inter-laboratory Comparison Program (ICP)

The TBE Laboratory analyzed Performance Evaluation (PE) samples of air particulate, air iodine, milk, soil, vegetation, and water matrices for various analytes. The PE samples supplied by Analytics Inc., Environmental Resource Associates (ERA) and Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP), were evaluated against the following pre-set acceptance criteria:

A.1 Analytics Evaluation Criteria

Analytics' evaluation report provides a ratio of TBE's result and Analytics' known value. Since flag values are not assigned by Analytics, TBE evaluates the reported ratios based on internal QC requirements based on the DOE MAPEP criteria.

A.2 ERA Evaluation Criteria

ERA's evaluation report provides an acceptance range for control and warning limits with associated flag values. ERA's acceptance limits are established per the US EPA, National Environmental Laboratory Accreditation Conference (NELAC), state-specific Performance Testing (PT) program requirements or ERA's SOP for the Generation of Performance Acceptance Limits, as applicable. The acceptance limits are either determined by a regression equation specific to each analyte or a fixed percentage limit promulgated under the appropriate regulatory document.

A.3 DOE Evaluation Criteria

MAPEP's evaluation report provides an acceptance range with associated flag values. MAPEP defines three levels of performance:

- Acceptable (flag = "A") - result within $\pm 20\%$ of the reference value
- Acceptable with Warning (flag = "W") - result falls in the $\pm 20\%$ to $\pm 30\%$ of the reference value
- Not Acceptable (flag = "N") - bias is greater than 30% of the reference value

Note: The Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP) samples are created to mimic conditions found at DOE sites which do not resemble typical environmental samples obtained at commercial nuclear power facilities.

For the TBE laboratory, 119 out of 129 analyses performed met the specified acceptance criteria. Ten analyses did not meet the specified acceptance criteria for the following reasons and were addressed through the TBE Corrective Action Program. A summary is found below:

1. The ERA April 2019 water Cs-134 result was evaluated as Not Acceptable. The reported value was 15.2 pCi/L (error 2.82 pCi/L) and the known result was 12.1 pCi/L (acceptance range of 8.39 - 14.4 pCi/L). With the error, the reported result overlaps the acceptable range. This sample was run as the workgroup duplicate on a different detector with a result of 10.7 pCi/L (within acceptable range). (NCR 19-10)
2. The ERA April 2019 water Sr-89 result was evaluated as Not Acceptable. The reported value was 44.9 pCi/L and the known result was 33.3 pCi/L (acceptance range of 24.5 - 40.1 pCi/L). The sample was only counted for 15 minutes instead of 200 minutes. The sample was re-prepped in duplicate and counted for 200 minutes with results of 30.7 ± 5.37 pCi/L and 33.0 ± 8.71 pCi/L. This was the 1st "high" failure for Sr-89 in 5 years. (NCR 19-11)

3. The MAPEP February 2019 soil Sr-90 result was not submitted and therefore evaluated as Not Acceptable. The sample was run in duplicate, with results of -1.32 ± 4.09 Bq/kg (<6.87) and -1.030 ± 3.55 Bq/kg (<5.97). The known result was a false positive test (no significant activity). TBE did not submit a result because it appeared that the results may not be accurate. TBE analyzed a substitute soil Sr-90 sample from another vendor, with a result within the acceptable range. (NCR 19-12)
4. The MAPEP February 2019 water Am-241 result was evaluated as Not Acceptable. The reported value was 0.764 ± 0.00725 Bq/L with a known result of 0.582 Bq/L (acceptable range 0.407 - 0.757 Bq/L). TBE's result falls within the upper acceptable range with the error. It appeared that a non-radiological interference was added and lead to an increased mass and higher result. (NCR 19-13)
5. The MAPEP February 2019 vegetation Sr-90 result was evaluated as Not Acceptable. The reported result was -0.1060 ± 0.0328 Bq/kg and the known result was a false positive test (no significant activity). TBE's result was correct in that there was no activity. MAPEP's evaluation was a "statistical failure" at 3 standard deviations. (NCR 19-14)
6. The ERA October 2019 water Gross Alpha result was evaluated as Not Acceptable. TBE's reported result was 40.5 ± 10.3 pCi/L and the known result was 27.6 pCi/L (ratio of TBE to known result at 135%). With the associated error, the result falls within the acceptable range (14.0 - 36.3 pCi/L). The sample was run as the workgroup duplicate on a different detector with a result of 30.8 ± 9.17 pCi/L (within the acceptable range). This was the first failure for drinking water Gr-A since 2012. (NCR 19-23)
7. The ERA October 2019 water Sr-90 result was evaluated as Not Acceptable. TBE's reported result was 32.5 ± 2.12 pCi/L and the known result was 26.5 pCi/L (ratio of TBE to known result at 123%). With the associated error, the result falls within the acceptable range (19.2 - 30.9 pCi/L). The sample was run as the workgroup duplicate on a different detector with a result of 20.0 ± 1.91 pCi/L (within the acceptable range). Both TBE results are within internal QC limits. A substitute "quick response" sample was analyzed with an acceptable result of 18.6 pCi/L (known range of 13.2 - 22.1 pCi/L). (NCR 19-24)
8. The MAPEP August 2019 soil Ni-63 result of 436 ± 22.8 Bq/kg was evaluated as Not Acceptable. The known result was 629 Bq/kg (acceptable range 440 - 818 Bq/sample). With the associated error, the TBE result falls within the lower acceptance range. All associated QC was acceptable. No reason for failure could be found. This is the first failure for soil Ni-63 since 2012. (NCR 19-25).
9. The MAPEP August 2019 water Am-241 result was not reported and therefore evaluated as Not Acceptable. Initial review of the results showed a large peak where Am-241 should be (same as the February, 2019 sample results). It is believed that Th-228 was intentionally added as interference. The sample was re-prepped and analyzed using a smaller sample aliquot. The unusual large peak (Th-228) was seen again and also this time a smaller peak (Am-241). The result was 436 ± 22.8 Bq/L (acceptable range 0.365 ± 0.679 Bq/L). Th-228 is not a typical nuclide requested by clients, so there is no analytical purpose to take samples through an additional separation step. TBE will pursue using another vendor for Am-241 water cross-checks that more closely reflects actual customer samples. (NCR 19-26)

10. The Analytics September 2019 soil Cr-51 sample was evaluated as Not Acceptable. TBE's reported result of 0.765 ± 0.135 pCi/g exceeded the upper acceptance range (140% of the known result of 0.547 pCi/g). The TBE result was within the acceptable range (0.63 - 0.90 pCi/g) with the associated error. The Cr-51 result is very close to TBE's normal detection limit. In order to get a reportable result, the sample must be counted for 15 hours (10x longer than client samples). There is no client or regulatory requirement for this nuclide and TBE will remove Cr-51 from the reported gamma nuclides going forward. (NCR 19-27)

The Inter-Laboratory Comparison Program provides evidence of "in control" counting systems and methods, and that the laboratories are producing accurate and reliable data.

**A.1 Analytics Environmental Radioactivity Cross Check Program
Teledyne Brown Engineering Environmental Services**

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value ^(a)	Ratio of TBE to Analytics Result	Evaluation ^(b)
March 2019	E12468A	Milk	Sr-89	pCi/L	87.1	96	0.91	A
			Sr-90	pCi/L	12.6	12.6	1.00	A
	E12469A	Milk	Ce-141	pCi/L	113	117	0.97	A
			Co-58	pCi/L	153	143	1.07	A
			Co-60	pCi/L	289	299	0.97	A
			Cr-51	pCi/L	233	293	0.80	A
			Cs-134	pCi/L	147	160	0.92	A
			Cs-137	pCi/L	193	196	0.98	A
			Fe-59	pCi/L	153	159	0.96	A
			I-131	pCi/L	91.5	89.5	1.02	A
			Mn-54	pCi/L	149	143	1.04	A
			Zn-65	pCi/L	209	220	0.95	A
			E12470	Charcoal	I-131	pCi	77.5	75.2
	E12471	AP	Ce-141	pCi	60.7	70.2	0.87	A
			Co-58	pCi	87.9	85.8	1.02	A
			Co-60	pCi	175	179	0.98	A
			Cr-51	pCi	165	176	0.94	A
			Cs-134	pCi	91.2	95.9	0.95	A
			Cs-137	pCi	120	118	1.02	A
			Fe-59	pCi	108	95.3	1.13	A
			Mn-54	pCi	94.2	85.7	1.10	A
	Zn-65	pCi	102	132	0.77	W		
	E12472	Water	Fe-55	pCi/L	2230	1920	1.16	A
	E12473	Soil	Ce-141	pCi/g	0.189	0.183	1.03	A
			Co-58	pCi/g	0.209	0.224	0.93	A
			Co-60	pCi/g	0.481	0.466	1.03	A
			Cr-51	pCi/g	0.522	0.457	1.14	A
Cs-134			pCi/g	0.218	0.250	0.87	A	
Cs-137			pCi/g	0.370	0.381	0.97	A	
Fe-59			pCi/g	0.263	0.248	1.06	A	
Mn-54			pCi/g	0.248	0.223	1.11	A	
Zn-65	pCi/g	0.371	0.344	1.08	A			
E12474	AP	Sr-89	pCi	88.3	95.2	0.93	A	
		Sr-90	pCi	11.7	12.5	0.94	A	
August 2019	E12562	Soil	Sr-90	pCi/g	4.710	6.710	0.70	W

(a) The Analytics known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation

(b) Analytics evaluation based on TBE internal QC limits:

A = Acceptable - reported result falls within ratio limits of 0.80-1.20

W = Acceptable with warning - reported result falls within 0.70-0.80 or 1.20-1.30

N = Not Acceptable - reported result falls outside the ratio limits of < 0.70 and > 1.30

**A.1 Analytics Environmental Radioactivity Cross Check Program
Teledyne Brown Engineering Environmental Services**

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value ^(a)	Ratio of TBE to Analytics Result	Evaluation ^(b)
September 2019	E12475	Milk	Sr-89	pCi/L	70.0	93.9	0.75	W
			Sr-90	pCi/L	12.0	12.9	0.93	A
	E12476	Milk	Ce-141	pCi/L	150	167	0.90	A
			Co-58	pCi/L	170	175	0.97	A
			Co-60	pCi/L	211	211	1.00	A
			Cr-51	pCi/L	323	331	0.98	A
			Cs-134	pCi/L	180	207	0.87	A
			Cs-137	pCi/L	147	151	0.97	A
			Fe-59	pCi/L	156	148	1.05	A
			I-131	pCi/L	81.1	92.1	0.88	A
			Mn-54	pCi/L	160	154	1.04	A
			Zn-65	pCi/L	303	293	1.03	A
	E12477	Charcoal	I-131	pCi	95.9	95.1	1.01	A
	E12478	AP	Ce-141	pCi	129	138	0.93	A
			Co-58	pCi	128	145	0.88	A
			Co-60	pCi	181	174	1.04	A
			Cr-51	pCi	292	274	1.07	A
			Cs-134	pCi	166	171	0.97	A
			Cs-137	pCi	115	125	0.92	A
			Fe-59	pCi	119	123	0.97	A
			Mn-54	pCi	129	128	1.01	A
	Zn-65	pCi	230	242	0.95	A		
	E12479	Water	Fe-55	pCi/L	1810	1850	0.98	A
	E12480	Soil	Ce-141	pCi/g	0.305	0.276	1.10	A
			Co-58	pCi/g	0.270	0.289	0.93	A
			Co-60	pCi/g	0.358	0.348	1.03	A
			Cr-51	pCi/g	0.765	0.547	1.40	N ⁽¹⁾
			Cs-134	pCi/g	0.327	0.343	0.95	A
			Cs-137	pCi/g	0.308	0.321	0.96	A
			Fe-59	pCi/g	0.257	0.245	1.05	A
Mn-54			pCi/g	0.274	0.255	1.07	A	
Zn-65	pCi/g	0.536	0.485	1.11	A			
E12481	AP	Sr-89	pCi	95.9	91.9	1.04	A	
		Sr-90	pCi	12.3	12.6	0.97	A	
E12563	Soil	Sr-90	pCi/g	0.392	0.360	1.09	A	

(a) The Analytics known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation

(b) Analytics evaluation based on TBE internal QC limits:

A = Acceptable - reported result falls within ratio limits of 0.80-1.20

W = Acceptable with warning - reported result falls within 0.70-0.80 or 1.20-1.30

N = Not Acceptable - reported result falls outside the ratio limits of < 0.70 and > 1.30

(1) See **NCR 19-27**

**A.2 DOE's Mixed Analyte Performance Evaluation Program (MAPEP)
Teledyne Brown Engineering Environmental Services**

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value ^(a)	Acceptance Range	Evaluation ^(b)
February 2019	19-GrF40	AP	Gross Alpha	Bq/sample	0.184	0.528	0.158 - 0.898	A
			Gross Beta	Bq/sample	0.785	0.948	0.474 - 1.422	A
	19-MaS40	Soil	Ni-63	Bq/kg	420	519.0	363 - 675	A
			Sr-90	Bq/kg			(1)	NR ⁽³⁾
	19-MaW40	Water	Am-241	Bq/L	0.764	0.582	0.407 - 0.757	N ⁽⁴⁾
			Ni-63	Bq/L	4.72	5.8	4.1 - 7.5	A
			Pu-238	Bq/L	0.443	0.451	0.316 - 0.586	A
			Pu-239/240	Bq/L	-0.00161	0.0045	(2)	A
	19-RdF40	AP	U-234/233	Bq/sample	0.1138	0.106	0.074 - 0.138	A
			U-238	Bq/sample	0.107	0.110	0.077 - 0.143	A
	19-RdV40	Vegetation	Cs-134	Bq/sample	2.14	2.44	1.71 - 3.17	A
			Cs-137	Bq/sample	2.22	2.30	1.61 - 2.99	A
			Co-57	Bq/sample	2.16	2.07	1.45 - 2.69	A
			Co-60	Bq/sample	0.02382		(1)	A
			Mn-54	Bq/sample	-0.03607		(1)	A
			Sr-90	Bq/sample	-0.1060		(1)	N ⁽⁵⁾
			Zn-65	Bq/sample	1.35	1.71	1.20 - 2.22	W
August 2019	19-GrF41	AP	Gross Alpha	Bq/sample	0.192	0.528	0.158 - 0.898	W
			Gross Beta	Bq/sample	0.722	0.937	0.469 - 1.406	A
	19-MaS41	Soil	Ni-63	Bq/kg	436	629	440 - 818	N ⁽⁶⁾
			Sr-90	Bq/kg	444	572	400 - 744	W
	19-MaW41	Water	Am-241	Bq/L				NR ⁽⁷⁾
			Ni-63	Bq/L	7.28	9.7	6.8 - 12.6	W
			Pu-238	Bq/L	0.0207	0.0063	(2)	A
			Pu-239/240	Bq/L	0.741	0.727	0.509 - 0.945	A
	19-RdF41	AP	U-234/233	Bq/sample	0.0966	0.093	0.065 - 0.121	A
			U-238	Bq/sample	0.0852	0.096	0.067-0.125	A
	19-RdV41	Vegetation	Cs-134	Bq/sample	0.0197		(1)	A
			Cs-137	Bq/sample	3.21	3.28	2.30 - 4.26	A
			Co-57	Bq/sample	4.62	4.57	3.20 - 5.94	A
			Co-60	Bq/sample	4.88	5.30	3.71 - 6.89	A
			Mn-54	Bq/sample	4.54	4.49	3.14 - 5.84	A
			Sr-90	Bq/sample	0.889	1.00	0.70 - 1.30	A
			Zn-65	Bq/sample	2.78	2.85	2.00 - 3.71	A

(a) The MAPEP known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation

(b) DOE/MAPEP evaluation:

A = Acceptable - reported result falls within ratio limits of 0.80-1.20

W = Acceptable with warning - reported result falls within 0.70-0.80 or 1.20-1.30

N = Not Acceptable - reported result falls outside the ratio limits of < 0.70 and > 1.30

(1) False positive test

(2) Sensitivity evaluation

(3) See **NCR 19-12**

(4) See **NCR 19-13**

(5) See **NCR 19-14**

(6) See **NCR 19-25**

(7) See **NCR 19-26**

**A.3 ERA Environmental Radioactivity Cross Check Program
Teledyne Brown Engineering Environmental Services**

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value ^(a)	Acceptance Limits	Evaluation ^(b)
April 2019	Rad-117	Water	Ba-133	pCi/L	26.3	24.1	18.6 - 27.8	A
			Cs-134	pCi/L	15.2	12.1	8.39 - 14.4	N ⁽¹⁾
			Cs-137	pCi/L	33.6	33.1	28.8 - 39.4	A
			Co-60	pCi/L	11.9	11.5	8.67 - 15.5	A
			Zn-65	pCi/L	87.1	89.2	80.3 - 107	A
			GR-A	pCi/L	19	19.3	9.56 - 26.5	A
			GR-B	pCi/L	20.2	29.9	19.1 - 37.7	A
			U-Nat	pCi/L	55.5	55.9	45.6 - 61.5	A
			H-3	pCi/L	21500	21400	18700 - 23500	A
			Sr-89	pCi/L	44.9	33.3	24.5 - 40.1	N ⁽²⁾
			Sr-90	pCi/L	24.5	26.3	19.0 - 30.7	A
I-131	pCi/L	28.9	28.4	23.6 - 33.3	A			
October 2019	Rad-119	Water	Ba-133	pCi/L	42.7	43.8	35.7 - 48.8	A
			Cs-134	pCi/L	53.5	55.9	45.2 - 61.5	A
			Cs-137	pCi/L	77.7	78.7	70.8 - 89.2	A
			Co-60	pCi/L	51.5	53.4	48.1 - 61.3	A
			Zn-65	pCi/L	36.6	34.0	28.5 - 43.1	A
			GR-A	pCi/L	40.5	27.6	14.0 - 36.3	N ⁽³⁾
			GR-B	pCi/L	36.3	39.8	26.4 - 47.3	A
			U-Nat	pCi/L	27.66	28.0	22.6 - 31.1	A
			H-3	pCi/L	22800	23400	20500 - 25700	A
			Sr-89	pCi/L	47.1	45.5	35.4 - 52.7	A
			Sr-90	pCi/L	32.5	26.5	19.2 - 30.9	N ⁽⁴⁾
I-131	pCi/L	26.0	23.9	19.8 - 28.4	A			
December 2019	QR 120419D	Water	Sr-90	pCi/L	20.1	18.6	13.2 - 22.1	A

(a) The ERA known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation.

(b) ERA evaluation:

A = Acceptable - Reported value falls within the Acceptance Limits

N = Not Acceptable - Reported value falls outside of the Acceptance Limits

(1) See **NCR 19-10**

(2) See **NCR 19-11**

(3) See **NCR 19-23**

(4) See **NCR 19-24**

APPENDIX C

ERRATUM

Erratum- Correction to Previously Published Annual Radiological Environmental Operating Report

In the 2019 Annual Radiological Environmental Operating Report there were no correction identified to previously published Annual Radiological Environmental Operating Reports.