

April 30, 2020 Docket No. 50-443 SBK-L-20052

U.S. Nuclear Regulatory Commission Attn.: Document Control Desk Washington, DC 20555-0001

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Pursuant to 10CFR 50.36a (a).2 and Technical Specification 6.8.1.4, NextEra Energy Seabrook, LLC submits the Annual Radioactive Effluent Release Report for 2019. No changes were made to the Offsite Dose Calculation Manual (ODCM) since the previous submittal pursuant to Technical Specification 6.13.c.

The following information is provided in the enclosures:

Enclosure 1	Effluent release data as required by Regulatory Guide 1.21
Enclosure 2	Joint frequency distributions of wind speed, wind direction, and
	atmospheric stability
Enclosure 3	Radiation dose assessment

Should you have any questions regarding this letter, please contact David Robinson, Chemistry and Radiation Protection Department Manager, at (603) 773-7496.

Sincerely,

NextEra-Energy S abrook. LLC Kenneth Brown

Safety Assurance and Learning Site Director

NextEra Energy Seabrook, LLC

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cc: NRC Region I Administrator NRC Project Manager, Project Directorate I-2 NRC Senior Resident Inspector S. Wilson, Region I Inspector Seth Breitmaier, American Nuclear Insurers

<u>Enclosure 1</u>

Effluent Release Data as Required by Regulatory Guide 1.21

List of Appendices

<u>Appendix</u>	Title
A	Offsite Dose Calculation Manual
В	Process Control Program
С	Liquid Holdup Tanks
D	Radwaste Treatment Systems
E	Unplanned Releases

Appendix A

Offsite Dose Calculation Manual

Requirement: Technical Specification 6.13.2c requires that licensee initiated changes to the Offsite Dose Calculation Manual be submitted to the Commission in the Annual Radioactive Effluent Release Report for the period in which the change(s) was made effective. Include in this changes to the Radiological Environmental Program in accordance with Offsite Dose Calculation Manual (ODCM) - C.9.1.1 and - C.9.2.1.

Response: Changes were made to the ODCM in 2019.

Changes to the Seabrook ODCM to be included under Revision 40 include the following items:

• Station Operation Review Committee (SORC) changed to Onsite Review Group (ORG), in sections A.2-1 and B.1-1.

Appendix B

Process Control Program

Requirement: The Offsite Dose Calculation Manual requires that licensee initiated changes to the Process Control Program be submitted to the Commission in the Annual Radioactive Effluent Release Report for the period in which the change(s) was made.

Response: No changes were made to the process control program in 2019.

Appendix C

Liquid Holdup Tanks

Requirement: Technical Specification 3.11.1.4 limits the quantity of radioactive material contained in any outside temporary tank. With the quantity of radioactive material in any outside temporary tank exceeding the limits of Technical Specification 3.11.1.4, a description of the events leading to this condition is required in the next Annual Effluent Release Report in accordance with Tech. Spec. 6.8.1.4.

Response: From January 1, 2019 to December 31, 2019, there was no radioactive material stored in any temporary outdoor tank that exceeded the limits of T. S. 3.11.1.4.

Appendix D

Radwaste Treatment Systems

- **Requirement:** Technical Specification 6.14.1a requires that licensee initiated changes to the Radwaste Treatment Systems (liquid, gaseous, and solid) be submitted to the Commission in the Annual Radioactive Effluent Release Report for the period in which the change was made.
- **Response:** For 2019 NextEra Energy Seabrook LLC, will submit any changes to the Radwaste Treatment Systems (liquid, gaseous and solid) as part of the FSAR update.

Appendix E

Unplanned Releases

- **Requirement:** Technical Specification 6.8.1.4 requires a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.
 - Submit all groundwater monitoring well sample results and a description of any significant onsite leaks/spills that impact groundwater
- **Response:** A review of the January 1, 2019 to December 31, 2019 period indicated there were no unplanned, unanticipated or abnormal releases from the site to unrestricted areas of radioactive materials of gaseous or liquid effluents. See next sheet for groundwater monitoring well results.

TABLE 1A

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019

GASEOUS EFFLUENTS-SUMMATION OF ALL RELEASES

	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Est. Total Error, %
A. Fission and activation gases						
1. Total releases	Ci	6.28E-03	1.15E-02	3.25E-02	2.98E-02	1.70E+01
2. Average release rate for period	uCi/sec	8.08E-04	1.46E-03	4.09E-03	3.75E-03	
3. Percent of applicable Technical Specification limit	%	7.80E-05	1.84E-04	5.20E-04	5.82E-04	
B. lodines						
1. Total release	Ci	ND	ND	ND	ND	1.50E+01
2. Average release rate for period	uCi/sec	N/A	N/A	N/A	N/A	
3. Percent of applicable Technical Specification limit	%	N/A	N/A	N/A	N/A	
C. Particulates				-		
1. Total release	Ci	2.05E+00	5.02E+00	3.13E+00	1.86E+00	1.80E+01
2. Average release rate for period	uCi/sec	2.64E-01	6.38E-01	3.94E-01	2.34E-01	
3. Percent of applicable Technical Specification limit	%	4.67E-01	1.32E-01	2.81E-01	1.48E-01	
4. Total alpha radioactivity	Ci	ND	ND	ND	ND	~
D. Tritium			-			
1. Total release	Ci	3.34E+01	7.88E+00	1.66E+01	9.43E+00	1.60E+01
2. Average release rate for period	uCi/sec	4.30E+00	1.00E+00	2.09E+00	1.19E+00	
 Percent of applicable Technical Specification limit 	%	4.67E-01	1.32E-01	2.81E-01	1.48E-01	

TABLE 1B

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019 GASEOUS EFFLUENTS-ELEVATED RELEASES

BATCH

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

1. Fission and activation gases

argon-41	Ci	5.84E-03	1.10E-02	3.16E-02	2.88E-02
krypton-85	Ci	ND	ND	ND	ND
krypton-85m	Ci	ND	ND	ND	ND
krypton-87	Ci	ND	ND	ND	ND
krypton-88	Ci	ND	ND	ND	ND
xenon-131m	Ci	ND	ND	ND	ND
xenon-133	Ci	ND	ND	ND	3.19E-04
xenon-133m	Ci	ND	ND	ND	ND
xenon-135	Ci	4.38E-04	4.99E-04	8.96E-04	6.15E-04
xenon-135m	Ci	ND	ND	ND	ND
xenon-138	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	6.28E-03	1.15E-02	3.25E-02	2.97E-02

2. Iodines

iodine-131	Ci	ND	ND	ND	ND
iodine-132	Ci	ND	ND	ND	ND
iodine-133	Ci	ND	ND	ND	ND
iodine-135	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

strontium-89	Ci	ND	ND	ND	ND
strontium-90	Ci	ND	ND	ND	ND
cesium-134	Ci	ND	ND	ND	ND
cesium-137	Ci	ND	ND	ND	ND
barium-lanthanum-140	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

TABLE 1B

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019 GASEOUS EFFLUENTS-ELEVATED RELEASES

CONTINUOUS

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

1. Fission and activation gases

argon-41	Ci	ND	ND	ND	ND
krypton-85	Ci	ND	ND	ND	ND
krypton-85m	Ci	ND	ND	ND	ND
krypton-87	Ci	ND	ND	ND	ND
krypton-88	Ci	ND	ND	ND	ND
xenon-131m	Ci	ND	ND	ND	ND
xenon-133	Ci	ND	ND	ND	ND
xenon-133m	Ci	ND	ND	ND	ND
xenon-135	Ci	ND	ND	ND	ND
xenon-135m	Ci	ND	ND	ND	ND
xenon-138	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

2. Iodines

iodine-131	Ci	ND	ND	ND	ND
iodine-132	Ci	ND	ND	ND	ND
iodine-133	Ci	ND	ND	ND	ND
iodine-135	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

strontium-89	Ci	ND	ND	ND	ND
strontium-90	Ci	ND	ND	ND	ND
cesium-134	Ci	ND	ND	ND	ND
cesium-137	Ci	ND	ND	ND	ND
barium-lanthanum-140	Ci	ND	ND	ND	ND
cobalt-58	Ci	ND	ND	ND	ND
cobalt-60	Ci	ND	ND	ND	ND
chromium-51	Ci	ND	ND	ND	ND
manganese-54	Ci	ND	ND	ND	ND
niobium-95	Ci	ND	ND	ND	ND
iron-59	Ci	ND	ND	ND	ND
carbon-14	Ci	2.05E+00	5.02E+00	3.13E+00	1.86E+00
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	2.05E+00	5.02E+00	3.13E+00	1.86E+00

TABLE 1C

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019 GASEOUS EFFLUENTS-GROUND LEVEL RELEASES

BATCH

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

1. Fission and activation gases

argon-41	Ci	ND	ND	ND	ND
krypton-85	Ci	ND	ND	ND	ND
krypton-85m	Ci	ND	ND	ND	ND
krypton-87	Ci	ND	ND	ND	ND
krypton-88	Ci	ND	ND	ND	ND
xenon-131m	Ci	ND	ND	ND	ND
xenon-133m	Ci	ND	ND	ND	ND
xenon-133	Ci	ND	ND	ND	ND
xenon-135	Ci	ND	ND	ND	ND
xenon-135m	Ci	ND	ND	ND	ND
xenon-138	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

2. Iodines

iodine-131	Ci	ND	ND	ND	ND
iodine-132	Ci	ND	ND	ND	ND
iodine-133	Ci	ND	ND	ND	ND
iodine-135	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

strontium-89	Ci	ND	ND	ND	ND
strontium-90	Ci	ND	ND	ND	ND
cesium-134	Ci	ND	ND	ND	ND
cesium-136	Ci	ND	ND	ND	ND
cesium-137	Ci	ND	ND	ND	ND
barium-lanthanum-140	Ci	ND	ND	ND	ND
cobalt-57	Ci	ND	ND	ND	ND
cobalt-58	Ci	ND	ND	ND	ND
cobalt-60	Ci	ND	ND	ND	ND
manganese-54	Ci	ND	ND	ND	ND
iron-59	Ci	ND	ND	ND	ND
niobium/zirconium-95	Ci	ND	ND	ND	ND
chromium-51	Ci	ND	ND	ND	ND
technetium-99m	Ci	ND	ND	ND	ND
bromine-82	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

TABLE 1C

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019 GASEOUS EFFLUENTS-GROUND LEVEL RELEASES

CONTINUOUS

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

1. Fission and activation gases

argon-41	Ci	ND	ND	ND	ND
krypton-85	Ci	ND	ND	ND	ND
krypton-85m	Ci	ND	ND	ND	ND
krypton-87	Ci	ND	ND	ND	ND
krypton-88	Ci	ND	ND	ND	ND
xenon-133	Ci	ND	ND	ND	ND
xenon-135	Ci	ND	ND	ND	ND
xenon-135m	Ci	ND	ND	ND	ND
xenon-138	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

2. Iodines

iodine-131	Ci	ND	ND	ND	ND
iodine-133	Ci	ND	ND	ND	ND
	Ci				
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

3. Particulates									
strontium-89	Ci	ND	ND	ND	ND				
strontium-90	Ci	ND	ND	ND	ND				
cesium-134	Ci	ND	ND	ND	ND				
cesium-136	Ci	ND	ND	ND	ND				
cesium-137	Ci	ND	ND	ND	ND				
barium-lanthanum-140	Ci	ND	ND	ND	ND				
cobalt-58	Ci	ND	ND	ND	ND				
cobalt-60	Ci	ND	ND	ND	ND				
chromium-51	Ci	ND	ND	ND	ND				
unidentified	Ci	ND	ND	ND	ND				
Total for period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00				

TABLE 2A

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019

LIQUID EFFLUENTS-SUMMATION OF ALL RELEASES

	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Est. Total Error, %		
A. Fission and activation products								
1. Total releases	Ci	6.38E-04	4.90E-04	1.14E-03	4.70E-03	7.00E+00		
2. Average diluted concentration during period	uCi/ml	2.91E-12	2.13E-12	4.75E-12	1.96E-11			
3. Percent of applicable limit	%	7.67E-04	6.23E-04	1.27E-03	1.31E-02			
B. Tritium								
1. Total release	Ci	3.38E+01	2.11E+01	1.40E+01	5.90E+02	9.00E+00		
2. Average diluted concentration during period	uCi/ml	1.54E-07	9.17E-08	5.83E-08	2.46E-06			
3. Percent of applicable limit	%	4.36E-04	2.68E-04	8.20E-04	5.38E-03			
C. Dissolved and entrained gases								
1. Total release	Ci	ND	ND	ND	ND	1.90E+01		
2. Average diluted concentration during period	uCi/ml	N/A	N/A	N/A	N/A			
3. Percent of applicable limit	%	N/A	N/A	N/A	N/A			
D. Gross alpha radioactivity								
1. Total release	Ci	ND	ND	ND	ND	1.00E+01		
E. Volume of waste	liters	1.89E+07	1.76E+07	1.77E+07	2.05E+07	1.30E+00		

E. Volume of waste released (prior to dilution)	liters	1.89E+07	1.76E+07	1.77E+07	2.05E+07	1.30E+00
F. Volume of dilution water used during period	liters	2.19E+11	2.30E+11	2.40E+11	2.40E+11	9.00E+00

TABLE 2B EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019 LIQUID EFFLUENTS

BATCH MODE

Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4
strontium-89	Ci	ND	ND	ND	ND
strontium-90	Ci	ND	ND	ND	ND
cesium-134	Ci	ND	ND	ND	ND
cesium-137	Ci	ND	ND	ND	ND
iodine-131	Ci	ND	ND	ND	ND
iodine-133	Ci	ND	ND	ND	ND
cobalt-57	Ci	2.09E-06	ND	9.01E-06	ND
cobalt-58	Ci	5.06E-04	2.53E-04	2.77E-04	3.89E-04
cobalt-60	Ci	1.64E-05	4.01E-05	1.26E-04	2.72E-04
chromium-51	Ci	1.05E-04	ND	ND	6.22E-05
iron-55	Ci	ND	ND	ND	1.02E-03
iron-59	Ci	ND	ND	ND	ND
zinc-65	Ci	ND	ND	ND	ND
manganese-54	Ci	6.56E-06	8.78E-06	3.76E-06	ND
zirconium-niobium-95	Ci	ND	ND	ND	ND
molybdenum-99	Ci	ND	ND	ND	ND
technetium-99m	Ci	ND	ND	ND	ND
silver-110m	Ci	2.10E-06	ND	ND	ND
barium-lanthanum-140	Ci	ND	ND	ND	ND
cerium-141	Ci	ND	ND	ND	ND
antimony-122	Ci	ND	ND	ND	ND
antimony-124	Ci	ND	ND	ND	ND
antimony-125	Ci	ND	1.88E-04	7.28E-04	2.96E-03
antimony-126	Ci	ND	ND	ND	ND
niobium-97	Ci	ND	ND	ND	ND
tin-117m	Ci	ND	ND	ND	ND
sodium-24	Ci	ND	ND	ND	ND
Tellurium-129m	Ci	ND	ND	ND	ND
Tellurium-132	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period(above)	Ci	6.38E-04	4.90E-04	1.14E-03	4.70E-03
P	· · · · ·				
xenon-133	Ci	ND	ND	ND	ND
xenon-135	Ci	ND	ND	ND	ND

TABLE 2B EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT 2019 LIQUID EFFLUENTS

CONTINUOUS MODE

Nuclides Released	Unit	Quarter 1	Quarter 2	Quarter 3	Quarter 4
strontium-89	Ci	ND	ND	ND	ND
strontium-90	Ci	ND	ND	ND	ND
cesium-134	Ci	ND	ND	ND	ND
cesium-137	Ci	ND	ND	ND	ND
iodine-131	Ci	ND	ND	ND	ND
iodine-133	Ci	ND	ND	ND	ND
cobalt-57	Ci	ND	ND	ND	ND
cobalt-58	Ci	ND	ND	ND	2.61E-06
cobalt-60	Ci	ND	ND	ND	ND
iron-55	Ci	ND	ND	ND	ND
iron-59	Ci	ND	ND	ND	ND
zinc-65	Ci	ND	ND	ND	ND
manganese-54	Ci	ND	ND	ND	ND
chromium-51	Ci	ND	ND	ND	ND
zirconium-niobium-95	Ci	ND	ND	ND	ND
molybdenum-99	Ci	ND	ND	ND	ND
technetium-99m	Ci	ND	ND	ND	ND
barium-lanthanum-140	Ci	ND	ND	ND	ND
cerium-141	Ci	ND	ND	ND	ND
unidentified	Ci	ND	ND	ND	ND
Total for period(above)	Ci	0.00E+00	0.00E+00	0.00E+00	2.61E-06
(0)					
xenon-131m	Ci	ND	ND	ND	ND
xenon-133m	Ci	ND	ND	ND	ND
xenon-133	Ci	ND	ND	ND	ND
xenon-135	Ci	ND	ND	ND	ND

EFFLUENT AND WASTE DISPOSAL ANNUAL REPORT (YEAR) SOLID WASTE AND IRRADIATED FUEL SHIPMENTS

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (Not irradiated fuel)

1. Type of waste	Unit	1 year Period	Est. Total Error, %
a. Spent resins, filter sludges, evaporator	m ³	1.17E+01	2.50E+01
Bottoms, etc.	Ci	1.28E+01	2.50E+01
b. Dry compressible waste, contaminated	m ³	5.84E+01	2.50E+01
Equip, etc.	Ci	5.07E-01	2.50E+01
c. Irradiated components, control	m ³	N/A	N/A
Rods, etc.	Ci	1V/A	
d. Other (describe)	m ³	N/A	N/A
	Ci	IN/A	IN/A

2. Estimate of major nuclide composition (by type of waste)

a.	H-3	%	7.56E+01
	Ni-63	%	2.01E+01
	Co-60	%	1.96E+00
	Fe-55	%	1.06E+00
	Cs-137	%	3.38E-01
	Sb-125	%	3.27E-01
	Co-58	%	2.44E-01
	C-14	%	2.19E-01
	Mn-54	%	1.32E-01
	Co-57	%	2.06E-02
b.	Fe-55	%	3.89E+01
	Co-58	%	2.05E+01
	Ni-63	%	1.75E+01
	Co-60	%	1.04E+01
	Nb-95	%	5.83E+00
	Zr-95	%	3.24E+00
	C-14	%	1.61E+00
	Mn-54	%	8.93E-01
	H-3	%	7.00E-01
	Cs-137	%	1.97E-01
	Co-57	%	1.57E-01
	Sb-125	%	6.95E-02
	Ag-110m	%	1.58E-02
	Zn-65	%	1.33E-02
	Cr-51	%	3.71E-03
	Sn-113	%	3.00E-03
	Be-7	%	1.84E-03
	Nb-94	%	1.04E-03
	Ni-59	%	4.18E-04
	Sn-117m	%	9.87E-05
	Fe-59	%	5.44E-05
	Sr-89	%	1.65E-05

c.	N/A	%	N/A
d.	N/A	%	N/A

3. Solid Waste Disposition

Number of Shipments	Waste Class	Container Type	Solidification Agent	Mode of Transportation	Destination
2	A	General Design	N/A	Truck	Energy Solutions Oak Ridge, Tenn
2	А	General Design	N/A	Truck	Energy Solutions Oak Ridge, Tenn

B. IRRADIATED FUEL SHIPMENTS (Disposition)

Number of Shipments	Mode of Transportation	Destination
N/A	N/A	N/A

C. REVIEW AND APPROVAL

Prepared By:	Elizabeth Mohan	Date:	4/17/2020
Reviewed By:	Dem High	Date:	04-28-20
Approved By:	David ON demi	Date:	04/28/2020

Date/Time BD-1 BD-2 BD-3 BD-4 BD-5 BD-6 BU-1 SC-1 SD-1 SD-2 SD-3 SD-4 SD-5 SU-1 SW-1 SW-2 SW-3 SW-4 SW-5 SW-6 SU-10 SU-11 BU-10 BU-11 TW-1 TW-2 TW-3

	(pU/L)	(puil)	(puil)	$(p \cup l/L)$	$(p \cup l/L)$	(pU/L)	(pU/L)	(pU/L)	$(p \cup l/L)$	(puil)	(puil)	(puil)	(pU/L)	$(p \cup l/L)$	$(p \cup l/L)$	$(p \cup l/L)$	$(p \cup l/L)$	$(p \cup l / L)$	$(p \cup l/L)$	$(p \cup l/L)$	$(p \cup l / L)$	$(p \cup l/L)$	$(p \cup l / L)$	$(p \cup l/L)$	$(p \cup l/L)$	$(P \cup I/L)$	$(p \cup l/L)$
02/06/19																											
03/29/19															1330		<551										
06/26/19		661							<543						986		<530										
09/28/19		<611							<611						1240		<618										

Paired well locations:

SD-1 / BD-2 South of plant near seawall inside PA fence
SD-2 / BD-3 East of plant inside owner controlled area
SD-3 / BD-4 Northeast of plant inside owner controlled area
SD-4 / BD-5 Southwest of plant, south of cooling tower inside owner controlled area
SD-5 / BD-6 South of Unit 2 containment equipment hatch outside PA fence
SU-10 / BU-10 North / northwest of plant inside PA fence
SU-10 / BU-10 North / northwest of plant inside PA fence
SU-11 / BU-11 North of plant inside PA fence

Selected well locations:

SW-1 South of Fuel Storage Building (Indicator location) inside PA fence

SW-2 East of plant near Service Water Pump House inside PA fence

SW-3 Southwest of plant near Unit 1 to Unit 2 tunnel inside PA fence

SW-4 South of waste process building / steam generator blowdown room inside PA fence

SW-5 West of service water building inside PA fence

SW-6 Southwest of demineralized tank 259 inside PA fence

TW-1 Southeast of plant inside owner controlled area outside PA fence

TW-2 Southeast of plant inside owner controlled area outside PA fence

TW-3 Southeast of plant inside owner controlled area outside PA fence

Definitions:

S = Shallow	C = Cross gradient	U = up gradient	W = well
B = Bedrock	D = down gradient	T = temporary	

Note: All sample results in pCi/L

Enclosure 2

Joint Frequency Distributions of Wind Speed, Wind Direction, and Atmospheric Stability

							Ŵ	IND DI	RECTIC	N FROM	ſ							
SPEED MPH	Ν	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	.00	.00	.00.	00.	.00	.00.	00.	.00.	.00.	.00.	.00	.00.	.00	.00.	.00	.00.
(2)	.00	.00	.00	.00	.00	00.	.00	.00	00.	.00	.00	.00	.00	.00	.00	.00	.00	.00
C-3	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
(1)	.00	.00.	.00.	1.05	1.05	.00.	.00	.00.	00.	.00.	.00.	.00.	00.	.00.	.00	.00.	.00.	2.11
(2)	.00	.00	.00	.01	.01	.00	.00	.00	00.	.00	.00	.00	00.	.00	.00	.00	.00	.02
4-7	1	0	0	0	4	2	2	1	0	0	1	0	0	0	1	0	0	12
(1)	1.05	.00.	.00.	00.	4.21	2.11	2.11	1.05	.00.	00.	1.05	00.	.00	.00.	1.05	.00.	.00.	12.63
(2)	.01	.00	.00	00.	.05	.02	.02	.01	.00	00.	.01	00.	.00	.00	.01	.00	.00	.14
8-12 (1) (2)	0 .00. .00	0 .00. .00	0 .00. .00	7 7.37 .08	2 2.11 .02	6 6.32 .07	24 25.26 .28	3 3.16 .03	0 .00. .00	0 00. 00.	7 7.37 .08	5 5.26 .06	6 6.32 .07	4 4.21 .05	0 .00.	0 00. 00.	0 .00 .00	64 67.37 .74
13-18	0	1	1	5	1	0	2	0	0	1	1	0	3	2	0	0	0	17
(1)	.00	1.05	1.05	5.26	1.05	.00.	2.11	.00.	.00.	1.05	1.05	.00.	3.16	2.11	.00	.00.	.00.	17.89
(2)	.00	.01	.01	.06	.01	.00	.02	.00	.00	.01	.01	.00	.03	.02	.00	.00	.00	.20
19-24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00.	.00.	.00.	00.	.00.	.00.	00.	.00.	.00.	00.	.00.	00.	.00.	00.	.00	.00.	.00.	.00
(2)	.00	.00	.00	00.	.00	.00	00.	.00	.00	00.	.00	00.	.00	00.	.00	.00	.00	.00
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00.	.00.	.00.	.00	.00.	00.	00.	.00.	00.	.00	.00	.00.	.00.	.00	.00	.00.	.00.	.00
(2)	.00	.00	.00	.00	.00	00.	00.	.00	00.	.00	.00	.00	.00	.00	.00	.00	.00	.00
ALL SPEEDS	1	1	1	13	8	8	28	4	0	1	9	5	9	6	1	0	0	95
(1)	1.05	1.05	1.05	13.68	8.42	8.42	29.47	4.21	.00	1.05	9.47	5.26	9.47	6.32	1.05	.00	.00.	100.00
(2)	.01	.01	.01	.15	.09	.09	.32	.05	.00	.01	.10	.06	.10	.07	.01	.00	.00	1.09

CLASS FREQUENCY (PERCENT) = 1.09

(1)=PERCENT OF ALL GOOD OBSERVATIONS FOR THIS PAGE (2)=PERCENT OF ALL GOOD OBSERVATIONS FOR THIS PERIOD C= CALM (WIND SPEED LESS THAN OR EQUAL TO .95 MPH)

SEABROOK JAN19-DEC19 MET DATA JOINT FREQUENCY DISTRIBUTION (210-FOOT TOWER)

43.0 FT WIND DATA STABILITY CLASS A

43.0 FT WIND DATA STABILITY CLASS B CLASS FREQUENCY (PERCENT) = 2.	43.0 FT WIND DATA	STABILITY CLASS B	CLASS FREQUENCY (PERCENT) =	2.36
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43.0 FT WIND DATA	STABILITY CLASS B	CLASS FREQUENCY (PERCENT) = 2.
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43.0 FT WIND DATA	STABILITY CLASS B	CLASS FREQUENCY (PER	CENT) =

13.0 FT WIND	DATA	STABILITY	CLASS	В	CLASS	FREQUENCY	(PERCENT

WIND	DIRECTION	FROM	

SPEED MPH	Ν	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
C-3	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
(1)	.00	.00	.00	.00	.00	.00	.00	.00	.49	.00	.00	.00	.00	.00	.00	.00	.00	.49
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.01	.00	.00	.00	.00	.00	.00	.00	.00	.01
4-7	0	0	0	0	4	1	14	5	2	3	5	4	5	2	0	0	0	45
(1)	.00	.00	.00	.00	1.95	.49	6.83	2.44	.98	1.46		1.95	2.44	.98	.00	.00	.00	21.95
(2)	.00	.00	.00	.00	.05	.01	.16	.06	.02	.03	.06	.05	.06	.02	.00	.00	.00	.52
8-12	0	0	3	12	11	9	23	3	3	8	23	17	6	9	3	0	0	130
(1)	.00	.00	1.46	5.85	5.37	4.39	11.22	1.46	1.46	3.90	11.22	8.29	2.93	4.39	1.46	.00	.00	63.41
(2)	.00	.00	.03	.14	.13	.10	.26	.03	.03	.09	.26	.20	.07	.10	.03	.00	.00	1.50
13-18	0	0	1	2	1	0	1	0	0	4	1	3	3	8	3	1	0	28
(1)	.00	.00	.49	.98	.49	.00	.49	.00	.00	1.95	.49	1.46	1.46	3.90	1.46	.49	.00	13.66
(2)	.00	.00	.01	.02	.01	.00	.01	.00	.00	.05	.01	.03	.03	.09	.03	.01	.00	.32
19-24	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
(1)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.49	.00	.00	.00	.49
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.01	.00	.00	.00	.01
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
ALL SPEEDS	0	0	4	14	16	10	38	8	6	15	29	24	14	20	6	1	0	205
(1)	.00	.00	1.95	6.83	7.80	4.88	18.54	3.90	2.93	7.32	14.15	11.71	6.83	9.76	2.93	.49	.00	100.00
(2)	.00	.00	.05	.16	.18	.12	.44	.09	.07	.17	.33	.28	.16	.23	.07	.01	.00	2.36

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SEABROOK JAN19-DEC19 MET DATA JOINT FREQUENCY DISTRIBUTION (210	(210-FOC	T TOWER)
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STABILITY CLASS C

							й	IND DI	RECTIO	ON FROM	I				
SPEED MPH	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW
CALM (1) (2)	0 .00. .00	0 .00. .00	0 .00. .00	0 .00 .00	0 .00. .00	0 .00 .00	0 .00 .00	0 .00 .00	0 .00 .00	0 .00 .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00
C-3 (1) (2)	0 .00. .00	1 .21 .01	0 .00. .00	1 .21 .01	1 .21 .01	0 .00 .00	0 .00 .00	1 .21 .01	0 .00. .00	2 .42 .02	0 .00. .00	2 .42 .02	0 .00. .00	2 .42 .02	0 .00 .00
4-7	3	5 1.04	1 . 21	5 1.04	15 3.13	9 1.88	18 3.75	10 2.08	5 1.04	6 1.25	11	17	22	12	6 1.25

(1) (2)	.00	.21	.00	.21	.21	.00	.00 .00	.21	.00	.42	.00	.42			.00	.00	.00	2.08
(2)	.00	.01	.00	.01	.01	.00	.00	.01	.00	.02	.00	.02	.00	.02	.00	.00	.00	• 12
4-7	3	5	1	5	15	9	18	10	5	6	11	17	22	12	6	2	0	147
(1)	.63	1.04	.21	1.04	3.13	1.88	3.75	2.08	1.04	1.25	2.29	3.54	4.58	2.50	1.25	.42	.00	30.62
(2)	.03	.06	.01	.06	.17	.10	.21	.12	.06	.07	.13	.20	.25	.14	.07	.02	.00	1.69
8-12	1	0	5	13	25	14	28	6	1	13	34	30	27	43	19	3	0	262
(1)	.21	.00	1.04	2.71	5.21	2.92	5.83	1.25	.21	2.71	7.08	6.25		8.96	3.96	.63	.00	54.58
(2)	.01	.00	.06	.15	.29	.16	.32	.07	.01	.15	.39	.35	.31	.49	.22	.03	.00	3.02
13-18	0	0	3	1	0	0	0	0	0	1	3	3	6	20	9	2	0	48
(1)	.00	.00	.63	.21	.00	.00	.00	.00	.00	.21	.63	.63	1.25	4.17	1.88	.42	.00	10.00
(2)	.00	.00	.03	.01	.00	.00	.00	.00	.00	.01	.03	.03	.07	.23	.10	.02	.00	.55
19-24	0	0	0	0	2	0	0	0	0	0	3	0	0	5	3	0	0	13
(1)	.00	.00	.00	.00	.42	.00	.00	.00	.00	.00	.63	.00	.00	1.04	.63	.00	.00	2.71
(2)	.00	.00	.00	.00	.02	.00	.00	.00	.00	.00	.03	.00	.00	.06	.03	.00	.00	.15
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
ALL SPEEDS	4	6	9	20	43	23	46	17	6	22	51	52	55	82	37	7	0	480
(1)	.83	1.25	1.88	4.17	8.96	4.79	9.58	3.54	1.25				11.46		7.71	1.46	.00	100.00
(2)	.05	.07	.10	.23	.49	.26	.53	.20	.07	.25	.59	.60	.63	.94	.43	.08	.00	5.52

CLASS FREQUENCY (PERCENT) = 5.52

NNW VRBL TOTAL

0

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0

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0 0

(1)=PERCENT OF ALL GOOD OBSERVATIONS FOR THIS PAGE (2)=PERCENT OF ALL GOOD OBSERVATIONS FOR THIS PERIOD C= CALM (WIND SPEED LESS THAN OR EQUAL TO .95 MPH)

43.0 FT WIND DATA

SEVBDUUK	TAN19-DEC19	MET	מידימים	TOTMT	FREQUENCY	DISTRIBUTION	(210-FOOT	TOWER
SEABROOK	OWNT 3-DECT 3	INIC I	DATA	JUTNI	LKEOOFNCI	DISTRIBUTION	1210-2001	TOMER)

43.0 FT WIND DATA STABILITY CLASS D CLASS FREQUENCY (PERCENT) = 46.9	43.0 FT WIND DATA	STABILITY CLASS D	CLASS FREQUENCY	(PERCENT) =	46.95
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43.0	FT WIND	DATA	STABILITY	CLASS	D	CLASS	FREQUENCY	(PERCENT)	=	46.	. 95
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43.0 FT WIND DATA	STABILITY CLASS D	CLASS FREQUENCY	(PERCENT) =	46.9
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							ħ	NIND DI	RECTIO	N FROM	1							
SPEED MPH	Ν	NNE	NE	ENE	Ε	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	1	1	0	1	0	0	0	0	3
(1)	.00	.00	.00	.00.	.00	.00	.00.	.00	.00.	.02	.02	.00	.02	.00.	.00	.00.	00.	.07
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.01	.01	.00	.01	.00	.00	.00	00.	.03
C-3	11	14	3	18	19	8	4	20	20	14	19	17	24	39	27	18	0	275
(1)	.27	.34	.07	.44	.47	.20	.10	.49	.49	.34	.47	.42	.59	.96	.66	.44	.00	6.74
(2)	.13	.16	.03	.21	.22	.09	.05	.23	.23	.16	.22	.20	.28	.45	.31	.21	.00	3.17
4-7	103	58	55	98	114	66	107	113	75	89	120	114	129	171	189	94	0	1695
(1)	2.53	1.42	1.35	2.40	2.79	1.62	2.62	2.77	1.84	2.18	2.94	2.79	3.16	4.19	4.63	2.30	.00.	41.55
(2)	1.19	.67	.63	1.13	1.31	.76	1.23	1.30	.86	1.02	1.38	1.31	1.48	1.97	2.18	1.08	.00	19.51
8-12	48	37	71	64	101	67	52	26	23	74	107	101	158	283	213	64	0	1489
(1)	1.18	.91	1.74	1.57	2.48	1.64	1.27	.64	.56	1.81	2.62	2.48	3.87	6.94	5.22	1.57	.00	36.50
(2)	.55	.43	.82	.74	1.16	.77	.60	.30	.26	.85	1.23	1.16	1.82	3.26	2.45	.74	.00	17.14
13-18	3	1	38	25	18	10	1	5	6	21	24	25	57	190	114	6	0	544
(1)	.07	.02	.93	.61	.44	.25	.02	.12	.15	.51	.59	.61	1.40	4.66	2.79	.15	.00.	13.34
(2)	.03	.01	.44	.29	.21	.12	.01	.06	.07	.24	.28	.29	.66	2.19	1.31	.07	.00	6.26
19-24	0	0	3	3	14	1	0	0	0	1	3	0	7	21	16	0	0	69
(1)	.00	.00.	.07	.07	.34	.02	.00.	.00	.00	.02	.07	.00	.17	.51	.39	00.	.00.	1.69
(2)	.00	.00	.03	.03	.16	.01	.00	.00	.00	.01	.03	.00	.08	.24	.18	00.	.00	.79
GT 24	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	4
(1)	.00	.00	.00	.00	.10	.00	00.	00.	.00	.00	.00	.00	00.	.00	.00	.00	00.	.10
(2)	.00	.00	.00	.00	.05	.00	00.	00.	.00	.00	.00	.00	00.	.00	.00	.00	00.	.05
ALL SPEEDS	165	110	170	208	270	152	164	164	124	200	274	257	376	704	559	182	0	4079
(1)	4.05	2.70	4.17	5.10	6.62	3.73	4.02	4.02	3.04	4.90	6.72	6.30	9.22	17.26	13.70	4.46	.00.	100.00
(2)	1.90	1.27	1.96	2.39	3.11	1.75	1.89	1.89	1.43	2.30	3.15	2.96	4.33	8.10	6.43	2.09	.00	46.95
(1)=PERCENT	OF ALL	GOOD	OBSERV	ATTONS	FORT	HTS PA	GE											

SEABROOK	JAN19-DEC19	MET D	DATA	JOINT	FREOUENCY	DISTRIBUTION	(210-FOOT	TOWER)

43.0 FT WIND DATA STABILITY CLASS E

							Ŵ	IND DI	RECTIC	N FROM	I							
SPEED MPH	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	Ŵ	WNW	NW	NNW	VRBL	TOTAL
CALM	2	1	1	3	2	1	0	0	0	3	2	7	2	2	3	3	0	32
(1)	.07	.04	.04	.11	.07	.04	.00.	.00.	.00.	.11	.07	.26	.07	.07	.11	.11	.00	1.19
(2)	.02	.01	.01	.03	.02	.01	.00	.00	.00	.03	.02	.08	.02	.02	.03	.03	.00	.37
C-3	35	24	21	30	29	33	16	30	39	58	63	82	119	92	77	49	0	797
(1)	1.30	.89	.78	1.11	1.08	1.22	.59	1.11	1.45	2.15	2.34	3.04	4.42	3.41	2.86	1.82	00.	29.57
(2)	.40	.28	.24	.35	.33	.38	.18	.35	.45	.67	.73	.94	1.37	1.06	.89	.56	00.	9.17
4-7	34	31	28	39	49	24	53	40	66	68	145	266	242	222	132	57	0	1496
(1)	1.26	1.15	1.04	1.45	1.82	.89	1.97	1.48	2.45	2.52	5.38	9.87	8.98	8.24	4.90	2.12	.00.	55.51
(2)	.39	.36	.32	.45	.56	.28	.61	.46	.76	.78	1.67	3.06	2.79	2.56	1.52	.66	.00	17.22
8-12	1	14	17	16	16	6	4	9	13	19	44	31	30	40	26	6	0	292
(1)	.04	.52	.63	.59	.59	.22	.15	.33	.48	.71	1.63	1.15	1.11	1.48	.96	.22	00.	10.83
(2)	.01	.16	.20	.18	.18	.07	.05	.10	.15	.22	.51	.36	.35	.46	.30	.07	00.	3.36
13-18	0	0	12	15	8	0	0	0	8	6	1	0	1	5	1	0	0	57
(1)	.00	.00.	.45	.56	.30	.00	.00.	.00.	.30	.22	.04	.00.	.04	.19	.04	.00.	.00	2.12
(2)	.00	.00	.14	.17	.09	.00	.00	.00	.09	.07	.01	.00	.01	.06	.01	.00	.00	.66
19-24	0	0	5	4	7	0	0	0	0	0	0	0	0	0	0	0	0	16
(1)	.00.	.00	.19	.15	.26	00.	.00.	.00	.00.	.00.	.00.	.00.	.00.	.00	.00.	.00	.00.	.59
(2)	.00	.00	.06	.05	.08	00.	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.18
GT 24 (1) (2)	0 .00. .00	0 .00. .00	0 00. 00.	2 .07 .02	3 .11 .03	0 00. 00.	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00.	0 00. 00.	0 .00 .00	0 .00 .00	0 .00 .00	0 .00. .00	0 .00. .00	5 .19 .06
ALL SPEEDS	72	70	84	109	114	64	73	79	126	154	255	386	394	361	239	115	0	2695
(1)	2.67	2.60	3.12	4.04	4.23	2.37	2.71	2.93	4.68	5.71	9.46	14.32	14.62	13.40	8.87	4.27	.00.	100.00
(2)	.83	.81	.97	1.25	1.31	.74	.84	.91	1.45	1.77	2.94	4.44	4.53	4.16	2.75	1.32	.00	31.02

CLASS FREQUENCY (PERCENT) = 31.02

43.0 FT WIND DATA	STABILITY CLASS F	CLASS FREQUENCY (PERCENT) = 8.49
		WIND DIRECTION FROM

SPEED MPH	N	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	1	4	3	0	2	1	1	2	2	2	5	2	7	6	7	3	0	48
(1)	.14	.54	.41	00.	.27	.14	.14	.27	.27	.27	.68	.27	.95	.81	.95	.41	.00.	6.50
(2)	.01	.05	.03	00.	.02	.01	.01	.02	.02	.02	.06	.02	.08	.07	.08	.03	.00	.55
C-3 (1) (2)	11 1.49 .13	7 .95 .08	10 1.36 .12	18 2.44 .21	12 1.63 .14	5 .68 .06	5 .68 .06	3 .41 .03	5 .68 .06	10 1.36 .12	33 4.47 .38		102 13.82 1.17		59 7.99 .68	20 2.71 .23	0 00. 00.	464 62.87 5.34
4-7	4	0	1	0	13	1	5	3	1	8	18	55	27	41	38	7	0	222
(1)	.54	.00.	.14	00.	1.76	.14	.68	.41	.14	1.08	2.44	7.45	3.66	5.56	5.15	.95	.00.	30.08
(2)	.05	.00	.01	00.	.15	.01	.06	.03	.01	.09	.21	.63	.31	.47	.44	.08	.00	2.56
8-12	0	0	0	0	1	0	2	0	1	0	0	0	0	0	0	0	0	4
(1)	.00	.00	00.	.00	.14	.00.	.27	.00	.14	.00.	00.	.00	00.	.00	00.	.00	.00	.54
(2)	.00	.00	00.	.00	.01	.00	.02	.00	.01	.00	00.	.00	00	.00	00.	.00	.00	.05
13-18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	.00.	.00.	.00	.00.	00.	00.	00.	00.	.00.	00.	00.	.00	00.	.00	.00	.00
(2)	.00	.00	.00	.00	.00	.00	00.	00.	00.	00.	.00	00	00	.00	00.	.00	.00	.00
19-24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	00.	.00.	.00.	.00.	.00.	00.	00.	00.	.00	00.	00.	.00	.00.	.00.	.00	.00
(2)	.00	.00	00.	.00	.00	.00	.00	00.	00.	00.	.00	00	00	.00	.00	.00	.00	.00
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	00.	.00.	.00.	.00.	.00.	.00.	00.	.00.	.00	00.	00.	.00.	00.	00.	.00.	.00
(2)	.00	.00	00.	.00	.00	.00	.00	.00	00.	.00	.00	00	00.	.00	00.	00.	.00	.00
ALL SPEEDS (1) (2)	16 2.17 .18	11 1.49 .13	14 1.90 .16	18 2.44 .21	28 3.79 .32	7 .95 .08	13 1.76 .15	8 1.08 .09	9 1.22 .10	20 2.71 .23	56 7.59 .64		136 18.43 1.57		104 14.09 1.20	30 4.07 .35	0 .00. .00	738 100.00 8.49

43.0 FT	WIND D	A'I'A		STABL	LITY C	LASS G			CLASS	FREQU	ENCY	(PERCE)	NT) =	4.56				
							W	IND DI	RECTIC	N FROM	I							
SPEED MPH	N	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	ТО
CALM	3	1	0	1	1	1	0	0	0	1	1	4	1	4	5	1	0	6
(1)	.76	.25	.00	.25	.25	.25	.00.	.00.	.00.	.25	.25	1.01	.25	1.01	1.26	.25	.00	
(2)	.03	.01	.00	.01	.01	.01	.00	.00	.00	.01	.01	.05	.01	.05	.06	.01	.00	
C-3 (1) (2)	5 1.26 .06	5 1.26 .06	2 .51 .02	6 1.52 .07	3 .76 .03	3 .76 .03	1 .25 .01	0 .00. .00	2 .51 .02	5 1.26 .06	16 4.04 .18	35 8.84 .40		105 26.52 1.21	41 10.35 .47	11 2.78 .13	0 .00. .00	83 3
4-7	0	0	0	0	0	0	0	0	0	0	1	4	7	13	16	2	0	10
(1)	.00	.00	.00.	.00.	.00.	.00.	.00.	.00.	.00.	.00.	.25	1.01	1.77	3.28	4.04	.51	.00.	
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.01	.05	.08	.15	.18	.02	.00	
8-12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
(1)	.00.	.00	.00.	.00.	.00.	.00	.00	.00	00.	.00.	.00.	00.	00.	.00.	.00	.00.	.00.	
(2)	.00	.00	.00	.00	.00	.00	.00	.00	00.	.00	.00	00.	00	.00	.00	.00	.00	
13-18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
(1)	.00	.00.	.00.	.00.	.00	.00	.00.	.00.	00.	.00.	.00	.00.	.00	.00	.00	.00	.00.	
(2)	.00	.00	.00	.00	.00	.00	.00	.00	00	.00	.00	.00	.00	.00	.00	.00	.00	
19-24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
(1)	.00	.00.	.00.	.00.	.00.	.00.	.00.	.00.	.00.	.00	.00.	.00	.00	.00.	.00	.00	.00.	
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
(1)	.00	.00.	.00.	.00	.00.	.00.	.00.	.00.	.00.	.00	.00.	.00	.00	.00	.00.	.00.	.00	
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	
SPEEDS (1) (2)	8 2.02 .09	6 1.52 .07	2 .51 .02	7 1.77 .08	4 1.01 .05	4 1.01 .05	1 .25 .01	0 .00 .00	2 .51 .02	6 1.52 .07	18 4.55 .21	43 10.86 .49	97 24.49 1.12	122 30.81 1.40	62 15.66 .71	14 3.54 .16	0 .00. .00	100 4

STABILITY CLASS ALL

43.0 FT	WIND	DATA	
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WIND DIRECTION FROM

CLASS FREQUENCY (PERCENT) = 100.00

SPEED MPH	Ν	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	6	6	4	4	5	3	1	2	2	7	9	13	11	12	15	7	0	107
(1)	.07	.07	.05	.05	.06	.03	.01	.02	.02	.08	.10	.15	.13	.14	.17	.08	.00.	1.23
(2)	.07	.07	.05	.05	.06	.03	.01	.02	.02	.08	.10	.15	.13	.14	.17	.08	.00	1.23
C-3	62	51	36	74	65	49	26	54	67	89	131	205	334	333	204	98	0	1878
(1)	.71	.59	.41	.85	.75	.56	.30	.62	.77	1.02	1.51	2.36	3.84	3.83	2.35	1.13	.00	21.62
(2)	.71	.59	.41	.85	.75	.56	.30	.62	.77	1.02	1.51	2.36	3.84	3.83	2.35	1.13	.00	21.62
4-7	145	94	85	142	199	103	199	172	149	174	301	460	432	461	382	162	0	3660
(1)	1.67	1.08	.98	1.63	2.29	1.19	2.29	1.98	1.72	2.00	3.46	5.29	4.97	5.31	4.40	1.86	.00.	42.13
(2)	1.67	1.08	.98	1.63	2.29	1.19	2.29	1.98	1.72	2.00	3.46	5.29	4.97	5.31	4.40	1.86	.00	42.13
8-12	50	51	96	112	156	102	133	47	41	114	215	184	227	379	261	73	0	2241
(1)	.58	.59	1.10	1.29	1.80	1.17	1.53	.54	.47	1.31	2.47	2.12	2.61	4.36	3.00	.84	.00.	25.79
(2)	.58	.59	1.10	1.29	1.80	1.17	1.53	.54	.47	1.31	2.47	2.12	2.61	4.36	3.00	.84	.00	25.79
13-18	3	2	55	48	28	10	4	5	14	33	30	31	70	225	127	9	0	694
(1)	.03	.02	.63	.55	.32	.12	.05	.06	.16	.38	.35	.36	.81	2.59	1.46	.10	.00.	7.99
(2)	.03	.02	.63	.55	.32	.12	.05	.06	.16	.38	.35	.36	.81	2.59	1.46	.10	.00	7.99
19-24	0	0	8	7	23	1	0	0	0	1	6	0	7	27	19	0	0	99
(1)	.00	.00.	.09	.08	.26	.01	.00	.00	.00	.01	.07	00.	.08	.31	.22	.00.	.00.	1.14
(2)	.00	.00	.09	.08	.26	.01	.00	.00	.00	.01	.07	00.	.08	.31	.22	.00	.00	1.14
GT 24	0	0	0	2	7	0	0	0	0	0	0	0	0	0	0	0	0	9
(1)	.00	.00.	.00.	.02	.08	.00.	.00.	.00.	.00.	.00.	.00.	00.	00.	.00	.00	.00.	.00.	.10
(2)	.00	.00	.00	.02	.08	.00	.00	.00	.00	.00	.00	00.	00.	.00	.00	.00	.00	.10
ALL SPEEDS (1) (2)	266 3.06 3.06	204 2.35 2.35	284 3.27 3.27	389 4.48 4.48	483 5.56 5.56	268 3.08 3.08	363 4.18 4.18	280 3.22 3.22	273 3.14 3.14	418 4.81 4.81				1437 16.54 16.54		349 4.02 4.02	0 .00. .00	8688 100.00 100.00

SEABROOK JAN19-DEC19 MET DATA J	DINT FREQUENCY DISTRIBUTION	(210-FOOT TOWER)
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209.0 FT WIND DATA	STABILITY CLASS A	CLASS FREQUENCY (PERCENT) =

SPEED MPH	N	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	Ŵ	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00.	.00.	.00	.00	.00.	.00	.00.	00.	.00	.00.	.00.	.00.	00.	00.	.00.	.00.	.00
(2)	.00	.00	.00	.00	.00	.00	.00	.00	00.	.00	.00	.00	.00	00	00.	.00	.00	.00
C-3	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2
(1)	.00	.00.	1.10	.00	.00.	1.10	.00	00.	00.	.00	.00.	.00	.00.	.00.	.00.	.00.	.00.	2.20
(2)	.00	.00	.01	.00	.00	.01	.00	00.	00.	.00	.00	.00	.00	.00	.00	.00	.00	.03
4-7	1	0	0	1	2	1	1	0	0	0	0	0	0	0	0	0	0	6
(1)	1.10	.00.	.00.	1.10	2.20	1.10	1.10	00.	00.	.00.	.00	.00.	.00.	.00	.00	.00.	.00.	6.59
(2)	.01	.00	.00	.01	.03	.01	.01	00.	00.	.00	.00	.00	.00	.00	.00	.00	.00	.08
8-12	0	0	0	2	1	2	13	4	0	0	1	1	2	0	0	0	0	26
(1)	.00.	.00.	.00.	2.20	1.10	2.20	14.29	4.40	.00.	.00.	1.10	1.10	2.20	.00	.00.	00.	00.	28.57
(2)	.00	.00	.00	.03	.01	.03	.17	.05	.00	.00	.01	.01	.03	.00	.00	00.	00.	.34
13-18	0	0	2	9	0	1	15	2	0	1	5	6	1	4	0	0	0	46
(1)	.00.	.00.	2.20	9.89	.00.	1.10	16.48	2.20	.00.	1.10	5.49	6.59	1.10	4.40	.00	00.	.00.	50.55
(2)	.00	.00	.03	.12	.00	.01	.20	.03	.00	.01	.07	.08	.01	.05	.00	00.	.00	.60
19-24	1	0	0	0	1	0	3	0	0	0	1	0	3	2	0	0	0	11
(1)	1.10	.00.	00.	.00.	1.10	.00.	3.30	.00.	00.	.00.	1.10	.00.	3.30	2.20	.00.	00.	.00.	12.09
(2)	.01	.00	00.	.00	.01	.00	.04	.00	00.	.00	.01	.00	.04	.03	.00	00.	.00	.14
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00.	00.	.00.	00.	.00.	.00	.00.	00.	.00.	.00.	.00.	00.	.00.	.00.	.00.	.00.	.00.
(2)	.00	.00	00.	.00	00.	.00	.00	.00	00.	.00	.00	.00	00.	.00	.00	.00	.00	.00
ALL SPEEDS (1) (2)	2 2.20 .03	0 .00.	3 3.30 .04	12 13.19 .16	4 4.40 .05	5 5.49 .07	32 35.16 .42	6 6.59 .08	0 .00. .00	1 1.10 .01	7 7.69 .09	7 7.69 .09	6 6.59 .08	6 6.59 .08	0 .00. .00	0 .00. .00	0 .00. .00	91 100.00 1.19

WIND DIRECTION FROM

1.19

										21 2210								
SPEED MPH	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00.	00.	.00.	.00.	00.	.00	.00.	.00.	00.	00.	00.	00.	.00	.00.	.00.	00.	.00
(2)	.00	.00	00.	.00	.00	00	.00	.00	.00	00.	00	00.	00	.00	.00	.00	00.	.00
C-3	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
(1)	.00	.00.	.00	.00	.51	.00	.00.	00.	.00.	00.	.51	00.	00.	.00	.00.	00.	.00.	1.01
(2)	.00	.00	.00	.00	.01	.00	.00	00.	.00	00.	.01	00	00	.00	.00	00.	.00	.03
4-7	0	0	0	0	3	0	0	0	0	1	2	1	2	1	0	0	0	10
(1)	.00	.00.	.00	.00	1.52	.00.	.00	00.	00.	.51	1.01	.51	1.01	.51	.00.	.00.	.00.	5.05
(2)	.00	.00	.00	.00	.04	.00	.00	00.	00.	.01	.03	.01	.03	.01	.00	.00	.00	.13
8-12	0	0	1	11	8	7	27	8	1	4	10	8	6	5	1	0	0	97
(1)	.00.	.00.	.51	5.56	4.04	3.54	13.64	4.04	.51	2.02	5.05	4.04	3.03	2.53	.51	.00	.00.	48.99
(2)	.00	.00	.01	.14	.10	.09	.35	.10	.01	.05	.13	.10	.08	.07	.01	.00	.00	1.27
13-18	0	0	3	3	1	1	4	7	1	5	17	11	8	6	1	1	0	69
(1)	.00.	.00.	1.52	1.52	.51	.51	2.02	3.54	.51	2.53	8.59	5.56	4.04	3.03	.51	.51	00.	34.85
(2)	.00	.00	.04	.04	.01	.01	.05	.09	.01	.07	.22	.14	.10	.08	.01	.01	00.	.90
19-24	0	0	0	0	0	0	0	2	0	0	2	0	4	5	2	1	0	16
(1)	.00	.00.	00.	.00.	.00.	.00	.00	1.01	.00.	.00.	1.01	.00.	2.02	2.53	1.01	.51	.00.	8.08
(2)	.00	.00	00.	.00	.00	.00	.00	.03	.00	.00	.03	.00	.05	.07	.03	.01	.00	.21
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0	4
(1)	.00	.00.	00.	.00.	.00.	.00	.00	.00.	.00.	.00.	.00	.00	.00	2.02	.00.	.00.	.00.	2.02
(2)	.00	.00	00.	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.05	.00	.00	.00	.05
ALL SPEEDS	0	0	4	14	13	8	31	17	2	10	32	20	20	21	4	2	0	198
(1)	.00.	.00.	2.02	7.07	6.57	4.04	15.66	8.59	1.01	5.05	16.16	10.10	10.10	10.61	2.02	1.01	.00.	100.00
(2)	.00	.00	.05	.18	.17	.10	.40	.22	.03	.13	.42	.26	.26	.27	.05	.03	.00	2.58

WIND DIRECTION FROM

CLASS FREQUENCY (PERCENT) = 2.58

SEABROOK JAN19-DEC19 MET DATA JOINT FREQUENCY DISTRIBUTION (210-FOOT TOWER)

209.0 FT WIND DATA STABILITY CLASS B

209.0 FT WIND DATA STABILITY CLASS C

WIND DIRECTION FROM

CLASS FREQUENCY (PERCENT) = 5.72

SPEED MPH	Ν	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00.	00.	.00.	.00	.00	.00	.00	.00	.00.	.00	00.	00.	.00	.00.	.00	00.	.00
(2)	.00	.00	00.	.00	.00	.00	.00	.00	.00	.00	.00	00.	00.	.00	.00	.00	00.	.00
C-3	2	0	2	0	0	0	0	0	0	1	1	3	0	0	1	0	0	10
(1)	.46	.00.	.46	.00	00.	.00.	.00	.00	.00	.23	.23	.68	00.	.00.	.23	.00	.00	2.28
(2)	.03	.00	.03	.00	00.	.00	.00	.00	.00	.01	.01	.04	00	.00	.01	.00	.00	.13
4-7	3	0	1	4	5	2	4	2	3	4	8	8	6	4	4	1	0	59
(1)	.68	.00.	.23	.91	1.14	.46	.91	.46	.68	.91	1.83	1.83	1.37	.91	.91	.23	.00	13.47
(2)	.04	.00	.01	.05	.07	.03	.05	.03	.04	.05	.10	.10	.08	.05	.05	.01	.00	.77
8-12	3	3	5	16	21	13	28	19	1	5	17	14	34	17	11	0	0	207
(1)	.68	.68	1.14	3.65	4.79	2.97	6.39	4.34	.23	1.14	3.88	3.20	7.76	3.88	2.51	.00	.00	47.26
(2)	.04	.04	.07	.21	.27	.17	.37	.25	.01	.07	.22	.18	.44	.22	.14	.00	.00	2.70
13-18	1	0	3	3	0	0	9	9	1	6	18	11	13	26	19	3	0	122
(1)	.23	00.	.68	.68	.00.	.00.	2.05	2.05	.23	1.37	4.11	2.51	2.97	5.94	4.34	.68	.00.	27.85
(2)	.01	00	.04	.04	.00	.00	.12	.12	.01	.08	.23	.14	.17	.34	.25	.04	.00	1.59
19-24	0	0	0	0	2	0	0	0	0	0	1	0	6	14	4	1	0	28
(1)	.00.	.00.	.00.	.00.	.46	.00.	.00.	.00	.00.	.00	.23	00.	1.37	3.20	.91	.23	.00	6.39
(2)	.00	.00	.00	.00	.03	.00	.00	.00	.00	.00	.01	00.	.08	.18	.05	.01	.00	.37
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	3	7	2	0	0	12
(1)	.00.	.00.	.00	.00	.00.	.00.	.00.	.00	.00.	.00.	.00.	00.	.68	1.60	.46	.00.	.00	2.74
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	00.	.04	.09	.03	.00	.00	.16
ALL SPEEDS	9	3	11	23	28	15	41	30	5	16	45	36	62	68	41	5	0	438
(1)	2.05	.68	2.51	5.25	6.39	3.42	9.36	6.85	1.14	3.65	10.27	8.22	14.16	15.53	9.36	1.14	.00	100.00
(2)	.12	.04	.14	.30	.37	.20	.54	.39	.07	.21	.59	.47	.81	.89	.54	.07	.00	5.72

209.0 FT WIND DATA STABILITY CLASS D

CLASS FREQUENCY (PERCENT) = 46.44WIND DIRECTION FROM

SPEED MPH	Ν	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00	.00	.00.	.00.	.00	.00.	.00.	00.	.00.	.00.	.00.	00.	.00	.00.	.00.	00.	.00
(2)	.00	.00	.00	.00	.00	.00	.00	.00	00.	.00	.00	.00	00.	.00	.00	.00	00.	.00
C-3	6	6	3	6	15	6	2	5	6	8	4	9	5	11	8	4	0	104
(1)	.17	.17	.08	.17	.42	.17	.06	.14	.17	.22	.11	.25	.14	.31	.22	.11	00.	2.92
(2)	.08	.08	.04	.08	.20	.08	.03	.07	.08	.10	.05	.12	.07	.14	.10	.05	00.	1.36
4-7	47	24	29	54	56	57	57	43	45	41	66	39	29	62	77	58	0	784
(1)	1.32	.67	.82	1.52	1.57	1.60	1.60	1.21	1.26	1.15	1.85	1.10	.82	1.74	2.16	1.63	00.	22.03
(2)	.61	.31	.38	.70	.73	.74	.74	.56	.59	.54	.86	.51	.38	.81	1.00	.76	00.	10.23
8-12	74	49	43	51	55	70	78	92	62	57	108	68	95	168	156	81	0	1307
(1)	2.08	1.38	1.21	1.43	1.55	1.97	2.19	2.59	1.74	1.60	3.04	1.91	2.67	4.72	4.38	2.28	00.	36.73
(2)	.97	.64	.56	.67	.72	.91	1.02	1.20	.81	.74	1.41	.89	1.24	2.19	2.04	1.06	00.	17.06
13-18	46	43	42	20	12	10	18	29	5	26	88	40	72	233	167	35	0	886
(1)	1.29	1.21	1.18	.56	.34	.28	.51	.82	.14	.73	2.47	1.12	2.02	6.55	4.69	.98	.00.	24.90
(2)	.60	.56	.55	.26	.16	.13	.23	.38	.07	.34	1.15	.52	.94	3.04	2.18	.46	.00	11.56
19-24	14	9	25	11	16	10	4	2	3	4	13	6	39	114	93	4	0	367
(1)	.39	.25	.70	.31	.45	.28	.11	.06	.08	.11	.37	.17	1.10	3.20	2.61	.11	.00.	10.31
(2)	.18	.12	.33	.14	.21	.13	.05	.03	.04	.05	.17	.08	.51	1.49	1.21	.05	.00	4.79
GT 24	2	0	5	3	11	0	0	0	1	2	0	1	38	33	14	0	0	110
(1)	.06	.00	.14	.08	.31	.00.	.00.	.00.	.03	.06	00.	.03	1.07	.93	.39	.00.	.00.	3.09
(2)	.03	.00	.07	.04	.14	.00	.00	.00	.01	.03	00.	.01	.50	.43	.18	.00	.00	1.44
ALL SPEEDS	189	131	147	145	165	153	159	171	122	138	279	163	278	621	515	182	0	3558
(1)	5.31	3.68	4.13	4.08	4.64	4.30	4.47	4.81	3.43	3.88	7.84	4.58	7.81	17.45	14.47	5.12	.00.	100.00
(2)	2.47	1.71	1.92	1.89	2.15	2.00	2.08	2.23	1.59	1.80	3.64	2.13	3.63	8.10	6.72	2.38	.00	46.44

STABILITY CLASS E

WIND DIRECTION FROM

CLASS FREQUENCY (PERCENT) = 30.92

SPEED MPH	Ν	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	3
(1)	.00	.04	.04	.00.	00.	00.	.00	.00	.00	.00	.00	.00.	00.	.04	.00	.00.	.00	.13
(2)	.00	.01	.01	.00	00.	00.	.00	.00	.00	.00	.00	.00	00	.01	.00	.00	.00	.04
C-3	8	5	12	14	11	5	14	7	9	8	11	6	5	7	5	9	0	136
(1)	.34	.21	.51	.59	.46	.21	.59	.30	.38	.34	.46	.25	.21	.30	.21	.38	.00	5.74
(2)	.10	.07	.16	.18	.14	.07	.18	.09	.12	.10	.14	.08	.07	.09	.07	.12	.00	1.77
4-7	33	26	14	23	21	25	38	39	43	42	33	27	30	45	32	32	0	503
(1)	1.39	1.10	.59	.97	.89	1.06	1.60	1.65	1.82	1.77	1.39	1.14	1.27	1.90	1.35	1.35	.00.	21.23
(2)	.43	.34	.18	.30	.27	.33	.50	.51	.56	.55	.43	.35	.39	.59	.42	.42	.00	6.56
8-12	58	36	20	6	8	11	20	60	53	94	125	131	143	181	146	51	0	1143
(1)	2.45	1.52	.84	.25	.34	.46	.84	2.53	2.24	3.97	5.28	5.53	6.04	7.64	6.16	2.15	.00.	48.25
(2)	.76	.47	.26	.08	.10	.14	.26	.78	.69	1.23	1.63	1.71	1.87	2.36	1.91	.67	.00	14.92
13-18	8	22	14	13	7	1	2	6	14	16	63	68	98	109	61	11	0	513
(1)	.34	.93	.59	.55	.30	.04	.08	.25	.59	.68	2.66	2.87	4.14	4.60	2.57	.46	.00.	21.65
(2)	.10	.29	.18	.17	.09	.01	.03	.08	.18	.21	.82	.89	1.28	1.42	.80	.14	.00	6.70
19-24	0	5	6	9	6	0	0	0	1	8	2	3	2	8	2	0	0	52
(1)	.00	.21	.25	.38	.25	.00.	.00.	.00.	.04	.34	.08	.13	.08	.34	.08	.00.	.00.	2.20
(2)	.00	.07	.08	.12	.08	.00	.00	.00	.01	.10	.03	.04	.03	.10	.03	.00	.00	.68
GT 24	0	0	2	6	11	0	0	0	0	0	0	0	0	0	0	0	0	19
(1)	.00	.00	.08	.25	.46	.00	.00.	.00.	.00.	.00.	.00.	.00	.00	.00	.00	.00	.00.	.80
(2)	.00	.00	.03	.08	.14	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.25
ALL SPEEDS	107	95	69	71	64	42	74	112	120	168	234		278	351	246	103	0	2369
(1)	4.52	4.01	2.91	3.00	2.70	1.77	3.12	4.73	5.07	7.09	9.88		11.73	14.82	10.38	4.35	.00.	100.00
(2)	1.40	1.24	.90	.93	.84	.55	.97	1.46	1.57	2.19	3.05		3.63	4.58	3.21	1.34	.00	30.92

209.0 FT WIND DATA STABILITY CLASS F							CLASS FREQUENCY (PERCENT) = 8.74											
WIND DIRECTION FROM																		
SPEED MPH	Ν	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	0	0	1	0	0	0	1	0	0	0	0	1	0	0	2	0	5
(1)	.00	.00.	.00.	.15	.00	00.	.00	.15	.00	.00.	.00	00.	.15	.00	.00	.30	.00	.75
(2)	.00	.00	.00	.01	.00	00.	.00	.01	.00	.00	.00	00.	.01	.00	.00	.03	.00	.07
C-3	3	4	6	4	3	5	8	9	3	3	3	8	7	4	2	3	0	75
(1)	.45	.60	.90	.60	.45	.75	1.19	1.34	.45	.45	.45	1.19	1.04	.60	.30	.45	.00	11.19
(2)	.04	.05	.08	.05	.04	.07	.10	.12	.04	.04	.04	.10	.09	.05	.03	.04	.00	.98
4-7	9	8	5	11	7	1	3	17	20	16	31	14	12	14	12	8	0	188
(1)	1.34	1.19	.75	1.64	1.04	.15	.45	2.54	2.99	2.39	4.63	2.09	1.79	2.09	1.79	1.19	.00.	28.06
(2)	.12	.10	.07	.14	.09	.01	.04	.22	.26	.21	.40	.18	.16	.18	.16	.10	.00	2.45
8-12	16	13	1	1	2	2	2	8	13	31	37	45	31	54	50	28	0	334
(1)	2.39	1.94	.15	.15	.30	.30	.30	1.19	1.94	4.63	5.52	6.72	4.63	8.06	7.46	4.18	.00.	49.85
(2)	.21	.17	.01	.01	.03	.03	.03	.10	.17	.40	.48	.59	.40	.70	.65	.37	.00	4.36
13-18	2	2	0	0	0	0	0	2	2	4	4	8	15	11	14	4	0	68
(1)	.30	.30	.00.	.00.	.00.	.00	.00.	.30	.30	.60	.60	1.19	2.24	1.64	2.09	.60	.00.	10.15
(2)	.03	.03	.00	.00	.00	.00	.00	.03	.03	.05	.05	.10	.20	.14	.18	.05	.00	.89
19-24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00.	.00	.00.	.00.	.00	.00.	.00.	.00.	.00.	.00	.00.	.00.	.00	.00	.00.	.00.	.00.
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
GT 24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(1)	.00	.00.	.00.	.00.	.00	.00.	.00	.00	.00.	.00.	.00	.00.	.00.	.00	.00	.00	.00	.00
(2)	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
ALL SPEEDS	30	27	12	17	12	8	13	37	38	54	75	75	66	83	78	45	0	670
(1)	4.48	4.03	1.79	2.54	1.79	1.19	1.94	5.52	5.67	8.06	11.19	11.19	9.85	12.39	11.64	6.72	.00.	100.00
(2)	.39	.35	.16	.22	.16	.10	.17	.48	.50	.70	.98	.98	.86	1.08	1.02	.59	.00	8.74

SEABROOK	JAN19-DEC19	MET DAT	'A JOINT	FREQUENCY	DISTRIBUTION	(210-FOOT TOWER)
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209.0 FT WIND DATA	STABILITY CLASS G	CLASS FREQUENCY (PERCENT) = 4.41

SPEED MPH	Ν	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM (1) (2)	0 .00 .00	0 .00. .00	0 .00. .00	0 .00 .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 00. 00.	0 .00 .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00 .00
C-3 (1) (2)	2 .59 .03	1 .30 .01	3 .89 .04	2 .59 .03	0 .00.	3 .89 .04	2 .59 .03	4 1.18 .05	1 .30 .01	1 .30 .01	3 .89 .04	7 2.07 .09	2 .59 .03	4 1.18 .05	3 .89 .04	5 1.48 .07	0 .00. .00	43 12.72 .56
4-7 (1) (2)	8 2.37 .10	1 .30 .01	5 1.48 .07	1 .30 .01	1 .30 .01	2 .59 .03	7 2.07 .09	2 .59 .03	4 1.18 .05	10 2.96 .13	18 5.33 .23	15 4.44 .20	20 5.92 .26	13 3.85 .17	11 3.25 .14	14 4.14 .18	0 00. 00.	132 39.05 1.72
8-12 (1) (2)	10 2.96 .13	4 1.18 .05	0 00. 00.	1 .30 .01	0 .00.	0 .00. .00	5 1.48 .07	3 .89 .04	7 2.07 .09	5 1.48 .07	18 5.33 .23	13 3.85 .17	17 5.03 .22	17 5.03 .22	23 6.80 .30	19 5.62 .25	0 .00. .00	142 42.01 1.85
13-18 (1) (2)	0 .00 .00	0 .00 .00	0 00. 00.	0 .00 .00	0 .00.	0 .00. .00	0 00. 00.	1 .30 .01	2 .59 .03	0 00. 00.	0 .00 .00	1 .30 .01	1 .30 .01	4 1.18 .05	6 1.78 .08	6 1.78 .08	0 .00. .00	21 6.21 .27
19-24 (1) (2)	0 .00. .00	0 .00. .00	0 00. 00.	0 .00. .00	0 .00.	0 .00 .00	0 00. 00.	0 .00. .00	0 00. 00.	0 .00. .00	0 .00 .00	0 .00 .00	0 .00 .00	0 .00 .00	0 00. 00.	0 .00 .00	0 .00. .00	0 .00 .00
GT 24 (1) (2)	0 .00. .00	0 .00. .00	0 .00. .00	0 .00 .00	0 .00. .00	0 .00 .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00. .00	0 .00 .00	0 .00 .00	0 .00. .00	0 .00. .00	0 00. 00.	0 00. 00.	0 .00. .00	0 .00 .00
ALL SPEEDS (1) (2)	20 5.92 .26	6 1.78 .08	8 2.37 .10	4 1.18 .05	1 .30 .01	5 1.48 .07	14 4.14 .18	10 2.96 .13	14 4.14 .18	16 4.73 .21	39 11.54 .51	36 10.65 .47	40 11.83 .52	38 11.24 .50	43 12.72 .56	44 13.02 .57	0 .00. .00	338 100.00 4.41

WIND DIRECTION FROM

SEABROOK JAN19-DEC19 MET DATA JOINT FREQUENCY DISTRIBUTION (210-FOOT TOWER)

209.0 FT WIND DATA	STABILITY CLASS ALL	CLASS FREQUENCY (PERCENT) = 100.00
LOJIO LI MIND DINN	BIIMINI CLICB IIII	CHILDS FILLQOBILCT (FERCERIT) FOO.00

WIND DIRECTION FROM

SPEED MPH	Ν	NNE	NE	ENE	Е	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	VRBL	TOTAL
CALM	0	1	1	1	0	0	0	1	0	0	0	0	1	1	0	2	0	8
(1)	.00	.01	.01	.01	.00.	00.	00.	.01	.00.	.00	.00.	00.	.01	.01	.00	.03	00.	.10
(2)	.00	.01	.01	.01	.00	00.	00.	.01	.00	.00	.00	00.	.01	.01	.00	.03	00.	.10
C-3	21	16	27	26	30	20	26	25	19	21	23	33	19	26	19	21	0	372
(1)	.27	.21	.35	.34	.39	.26	.34	.33	.25	.27	.30	.43	.25	.34	.25	.27	.00	4.86
(2)	.27	.21	.35	.34	.39	.26	.34	.33	.25	.27	.30	.43	.25	.34	.25	.27	.00	4.86
4-7	101	59	54	94	95	88	110	103	115	114	158	104	99	139	136	113	0	1682
(1)	1.32	.77	.70	1.23	1.24	1.15	1.44	1.34	1.50	1.49	2.06	1.36	1.29	1.81	1.77	1.47	.00.	21.95
(2)	1.32	.77	.70	1.23	1.24	1.15	1.44	1.34	1.50	1.49	2.06	1.36	1.29	1.81	1.77	1.47	.00	21.95
8-12	161	105	70	88	95	105	173	194	137	196	316	280	328	442	387	179	0	3256
(1)	2.10	1.37	.91	1.15	1.24	1.37	2.26	2.53	1.79	2.56	4.12	3.65	4.28	5.77	5.05	2.34	.00.	42.50
(2)	2.10	1.37	.91	1.15	1.24	1.37	2.26	2.53	1.79	2.56	4.12	3.65	4.28	5.77	5.05	2.34	.00	42.50
13-18	57	67	64	48	20	13	48	56	25	58	195	145	208	393	268	60	0	1725
(1)	.74	.87	.84	.63	.26	.17	.63	.73	.33	.76	2.55	1.89	2.71	5.13	3.50	.78	.00.	22.51
(2)	.74	.87	.84	.63	.26	.17	.63	.73	.33	.76	2.55	1.89	2.71	5.13	3.50	.78	.00	22.51
19-24	15	14	31	20	25	10	7	4	4	12	19	9	54	143	101	6	0	474
(1)	.20	.18	.40	.26	.33	.13	.09	.05	.05	.16	.25	.12	.70	1.87	1.32	.08	.00.	6.19
(2)	.20	.18	.40	.26	.33	.13	.09	.05	.05	.16	.25	.12	.70	1.87	1.32	.08	.00	6.19
GT 24	2	0	7	9	22	0	0	0	1	2	0	1	41	44	16	0	0	145
(1)	.03	.00.	.09	.12	.29	.00.	.00.	.00.	.01	.03	.00	.01	.54	.57	.21	.00.	.00.	1.89
(2)	.03	.00	.09	.12	.29	.00	.00	.00	.01	.03	.00	.01	.54	.57	.21	.00	.00	1.89
ALL SPEEDS (1) (2)	357 4.66 4.66	262 3.42 3.42	254 3.32 3.32	286 3.73 3.73	287 3.75 3.75	236 3.08 3.08	364 4.75 4.75	383 5.00 5.00	301 3.93 3.93	403 5.26 5.26	711 9.28 9.28	572 7.47 7.47		1188 15.51 15.51		381 4.97 4.97	0 .00. .00	7662 100.00 100.00

(1)=PERCENT OF ALL GOOD OBSERVATIONS FOR THIS PAGE (2)=PERCENT OF ALL GOOD OBSERVATIONS FOR THIS PERIOD C= CALM (WIND SPEED LESS THAN OR EQUAL TO .95 MPH)

Enclosure 3

Radiation Dose Assessment

SEABROOK STATION RADIOLOGICAL EPILUENT IMPACT ASSESSMENT FOR 2019 (Amust, Radiosotive Effluent Release Report)

Prepared for

NextErs Energy Seabmok, LLC P.O. Box 300 Scaboook, NH 93874

by

Franklung Inc. Lynchburg, VA 24506

Framestonic Document No. 103-3838-001

o-Asm Pelcone, Pres tony Contractor

4/27/20

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Theody Climes Reviewer Ted Messier, Framatome Inc. Meteorologist

Approvers

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Ryan Hoster, Franzione Inc. Supervisor

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Reference: Framatome Calculation 32-9310059-001

Seabrook Station Radiological Effluent Impact Assessment For 2019 (Annual Radioactive Effluent Release Report)

I. <u>Summary</u>

Seabrook Technical Specification Sections 6.7.6.g.4 & 9 require that limitations be placed on the quarterly and annual doses or dose commitments to Members of the Public from radioactive materials in liquid and gaseous effluents released from the station to Unrestricted Areas at or beyond the site boundary conforming to the dose objectives of Appendix I to 10 CFR Part 50. Technical Specification 6.7.6.g.8 requires that limitations on the quarterly and annual air doses resulting from noble gases released in gaseous effluents to areas beyond the site boundary also conform to Appendix I to 10 CFR Part 50. In a similar fashion, Technical Specification 6.7.6.g.11 requires limitations on the annual dose or dose commitment to any Member of the Public due to radioactivity and radiation from uranium fuel cycle sources conforming to the EPA Radiation Standards in 40 CFR Part 190. The following table details the above referenced effluent dose limits.

EFFLUENT TYPE	DOSE TYPE	QUARTERLY LIMITS	ANNUAL LIMITS		
LIQUIDS	Total Body	1.5 mrem	3 mrem		
(10CFR50, APP. I)	Max. Organ	5 mrem	10 mrem		
NOBLE GAS	Gamma Air	5 mrad	10 mrad		
(10CFR50, APP. I)	Beta Air	10 mrad	20 mrad		
GAS PARTICULATE (10CFR50, APP. I)	Max. Organ	7.5 mrem	15 mrem		
TOTAL DOSE	Total Body & organ		25 mrem		
(40CFR190) [liquids, gas, direct]	Thyroid		75 mrem		

DOSE OBJECTIVE	CRITERIA FOR	COMPLIANCE

Technical Specification 6.8.1.4 and the Seabrook Offsite Dose Calculation Manual (ODCM) Part A, Section 10.2, provide that the Station's Annual Radioactive Effluent Release Report include a demonstration of compliance with the above off-site dose limitations, as well as the determination of dose impacts to Members of the Public who may be associated with permitted activities inside the site boundary.

Doses resulting from actual liquid and gaseous effluents from Seabrook Station during 2019 were calculated in accordance with Method II as defined in the Station ODCM. The calculation methods follow the models in Regulatory Guide 1.109 (Reference 1). The assessments included maximum whole body doses and organ doses from all liquid releases, maximum offsite organ doses resulting from airborne Iodine, Tritium, Carbon-14 and particulate radionuclides with half-lives greater than eight days, and maximum offsite beta air and gamma air doses from airborne noble gases. Calculated dose impacts from airborne effluents included atmospheric dispersion estimates utilizing concurrent meteorology recorded by the Station's on-site meteorological tower. In addition, the potential direct dose from fixed radiation

sources from both plant operations and dry fuel storage were evaluated as part of the assessment required under 40 CFR Part 190 for doses from the uranium fuel cycle.

Doses were also calculated for three special receptor locations inside the site boundary where the public might be granted access for recreational or educational purposes. The Science and Nature Center is located in the southwest portion of the site and offers educational opportunities on nuclear power and the environment. The Fitness Center is located in the Hi-Rise office building, approximately 384 meters WSW from the plant vent stack. A third on-site location considered is the Firing Range for security force training (including local law enforcement), which straddles the West site boundary at approximately 974 meters from the plant vent stack. Another location which had been included in the past was the "Rocks" boat launching ramp in an area northeast of the main plant facilities with access to Brown's Creek and the tidal marsh that borders the site. This location has been dropped from consideration of public on-site activities due to restricted public access limitation as a result of security and safety concerns and abandonment of the boat launching ramp.

All calculated liquid and gaseous pathway doses for the 2019 reporting period are well below the dose criteria of 10 CFR Part 50, Appendix I, and the dose limits for effluent releases stated in the ODCM. In addition, the total dose to the most limiting Member of the Public due to the combined exposure to plant liquid and gaseous effluents and direct radiation from fixed plant and dry fuel storage sources was below the dose standards of 40 CFR Part 190.

Revision 001 incorporates updates to the 2nd and 4th quarter liquid batch effluent release data and the 1st and 3rd quarter elevated batch gas release data. The updated release data resulted in slight changes in the maximum organ and total body dose due to liquid effluents for the 1st and 3rd quarter, as well as the annual dose from liquid effluents. The updated doses are reflected in Tables A, B and C.

II. <u>Method for Calculating the Total Body and Maximum Organ Doses Resulting from Liquid</u> <u>Releases</u>

Liquid waste generated during plant operations is processed and discharged to the environment via the station's circulating water cooling system. The cooling system utilizes an offshore-submerged multiport diffuser discharge for rapid dissipation and mixing of liquid effluents in the ocean environment. A 22-port diffuser section of the discharge system is located in approximately 50 to 60 feet of water with each nozzle 7 to 10 feet above the sea floor. Eleven riser shafts, with two discharge nozzles for each diffuser, are spaced about 100 feet apart over a distance of about 1000 feet. Water is discharged in a generally eastward direction away from the shoreline through the multiport diffuser, beginning at a location over one mile offshore. During power operations, these high velocity jets passively entrain about ten volumes of fresh water into the near field jet-mixing region before the plume reaches the water surface. This arrangement also effectively prevents the discharge plume (at least to the 1 degree or 40 to 1 dilution isopleth) from impacting the shoreline over the tidal cycle.

During shutdown periods, the high velocity jet mixing created by the normal circulating water flow at the diffuser nozzles is reduced. However, mixing within the discharge tunnel water volume is significantly increased due to the long transit time for batch discharges to travel the three miles from the plant through the 19-foot diameter tunnels to the diffuser nozzles. Additional mixing of the effluent in the near field assures that an equivalent overall 10 to 1 dilution occurs by the time the effluent reaches the ocean surface.

The exposure pathways considered in the calculations of total body and maximum organ doses resulting from liquid discharges from Seabrook Station are limited to ingestion of aquatic foods and exposure to shoreline deposits. The dose calculations do not include the ingestion of potable water or irrigated vegetation as potential exposure pathways because the liquid effluents from the plant are discharged into salt water.

The dose assessment models utilized in the Offsite Dose Calculation Manual (Reference 2) are taken from Regulatory Guide 1.109 (Reference 1). The total body and organ doses are evaluated for each of the four age groups (i.e., infant, child, teen and adult) to determine the maximum total body dose and maximum organ dose via all existing exposure pathways (i.e., fish and aquatic invertebrate ingestion, and shoreline exposure) to an age-dependent individual from all detected radionuclides in plant releases. The values for the various factors considered in the model equations are provided in Regulatory Guide 1.109 and the ODCM (see Table D). The flow rate (F) of the liquid effluent and the radionuclide activities (Q_i) are measured specifically prior to each liquid release. The values for half-lives for radionuclides ($T_{1/2}$) and their radioactive decay constants (λ_i) have been taken from Kocher (Reference 3).

Table A presents the calculated liquid pathway doses for each calendar quarter and total for the year. The calculated annual doses as a percent of the applicable regulatory limits are shown in Table C. The estimated quarterly and annual doses resulting from liquid effluents to members of the public are well below all dose limit criteria.

III. Method for Calculating the Gamma and Beta Air Doses from Noble Gases

Gamma and beta air doses due to noble gases in gaseous effluents are calculated for several receptor locations when noble gases are recorded in effluents. Those locations include the points in each of the sixteen principle compass directions of estimated highest off-site ground level air concentration of radioactive material, site boundary (or closest point on the opposite shoreline in directions which are bordered by the tidal marsh), nearest resident, nearest vegetable garden, and nearest milk animal within five miles. The special on-site receptor locations (Science and Nature Center, the Fitness Center and the Firing Range) are evaluated for whole body dose to an individual from the noble gas component of effluents predicted to pass nearby.

Atmospheric dispersion factors (i.e., X/Q factors) calculated from recorded concurrent site meteorological data (i.e., meteorological data measurements taken during the time of the release) are used in the estimation of receptor specific air concentrations due to station effluents. The atmospheric dispersion estimations utilize methodology generally consistent with US NRC Regulatory Guide 1.111 (Reference 4). Beta air doses use undepleted X/Qs and assume a semi-infinite plume at the point of exposure. Gamma air doses are calculated using the finite cloud model presented in "Meteorology and Atomic Energy – 1968" (Reference 5). That model is implemented through the definition of an effective gamma atmospheric dispersion factor $[X/Q^{\gamma}]$ (Reference 6) and the replacement of the undepleted X/Q in the infinite cloud dose equation by $[X/Q^{\gamma}]$.

The release point of effluents is also considered in the atmospheric dispersion calculation. The primary vent stack is treated as a "mixed-mode" release, as defined in Regulatory Guide 1.111 (Reference 4). These effluents are considered to be part-time ground-level / part-time elevated releases, depending on the ratio of primary vent stack exit velocity relative to the speed of prevailing wind. All other release points (e.g., Turbine Building and Chemistry lab hoods) are considered ground-level releases. The beta air and gamma air dose calculations are consistent with the models presented in Regulatory Guide 1.109 (Reference 1). The values for the dose factors, DF_i^{γ} and DF_i^{β} , have been taken from Table B-1 in Regulatory Guide 1.109.

Table A presents the calculated maximum off-site gamma air and beta air doses for each calendar quarter and year. The calculated annual doses as a percent of the applicable regulatory limit are shown in Table C. The estimated quarterly and annual air doses resulting from noble gas effluents are well below all dose limit criteria.

IV. Method for Calculating the Critical Organ Dose Resulting from Iodines, Tritium, Carbon-14 and Particulates with T 1/2 Greater than 8 Days in Gaseous Releases

Regulatory Guide 1.109 (Reference 1) dose models are applied in the calculation of the critical organ doses from Iodines, Tritium, Carbon-14 and particulate radionuclides released into the atmosphere during the reporting period. Atmospheric dispersion and deposition factors (i.e., depleted X/Q and D/Q factors) calculated with concurrent meteorological data (i.e., meteorological data measurements taken during the time of the release) are used in the determination of gaseous pathway doses. The dispersion models are described in Section B.7.3.2 & B.7.3.3 of the Seabrook ODCM.

Potential exposure pathways associated with gaseous effluent are (i) external irradiation from radioactivity deposited on the ground surface, (ii) inhalation, and (iii) ingestion of vegetables (both fresh leafy and stored) and milk. Dose estimates were determined for the site boundary and for the locations of the nearest resident, vegetable garden, and milk animal in each of the sixteen principle compass directions. The locations of the nearest resident, vegetable garden and milk animal in each sector were identified by the 2019 Annual Land Use Census as required by ODCM Control C.9.2.1 (see Table F). Conservatism in the dose estimates was maintained by assuming that the vegetable garden pathway was active at each milk animal location. Milk animals were assumed to receive their entire intake from pasture during the second and third quarters. This is a conservative assumption because most dairy operations utilize supplemental feeding when animals are on pasture, or actually restrict animals to full time silage feeding throughout the entire year. Table E provides the reference sources for dose model parameter assumptions used in the dose assessment.

In June 2009, the NRC issued Revision 2 of Regulatory Guide 1.21 (Reference 7) which introduced the term "principal radionuclide" in a risk informed or dose context. A radionuclide can be considered a principal radionuclide if it contributes either (1) greater than 1 percent of the 10 CFR Part 50, Appendix I design objective dose for all radionuclides in the type of effluent being considered, or (2) greater than 1 percent of the activity of all radionuclides in the type of effluent being considered. In addition to natural production in the environment, Carbon-14 is also produced in nuclear reactors as a function of power output, but at amounts much less than those generated naturally or from past weapons testing. Since the time of the earlier publication of Regulatory Guide 1.21 (Revision 1) in 1974, commercial nuclear power plants have decreased total radioactive effluents (other than Carbon-14) through improved fuel performance and waste management practices to the point today that Carbon-14 could be considered a principal radionuclide under today's definition, and therefore has been included in the assessment of dose to the public from gaseous effluent releases for 2019.

The primary exposure pathways associated with Carbon-14 include inhalation and ingestion of food products that have incorporated Carbon-14 (in the form of CO_2) via photosynthesis. A full year's consumption of food products are assumed to be grown from the highest impacted garden during the growing season (2nd and 3rd quarters). It is also assumed that the garden grows sufficient mass to support ingestion throughout the year (i.e., the annual dose to the individual is from consumption during all four quarters).

The maximum organ doses from all radionuclides in this category of gaseous effluents were determined by summing the contributions from all exposure pathways at each location, and sorting in descending order.

Doses were calculated for the whole body, GI-LLI, bone, liver, kidney, thyroid, lung, and skin for adults, teenagers, children, and infants. The estimated quarterly and annual organ doses at the location of the maximally exposed individual are reported in Table A.

The estimated organ doses from Iodines, Tritium, Carbon-14 and Particulates in gaseous effluents are well below the 10 CFR Part 50, Appendix I dose criteria for the reporting period. (See Table C for calculated dose as a percentage of annual limits.)

V. Total Dose (40 CFR Part 190)

40 CFR 190 states that the annual dose equivalent should not exceed 25 mrem to the whole body, 75 mrem to the Thyroid, or 25 mrem to any other organ of any Member of the Public at and beyond the site boundary from all uranium fuel cycle sources. To show compliance with this standard, the maximum doses for both the liquid and gaseous pathways from Seabrook Station are added together with the whole body dose from noble gas releases and any direct radiation component attributed to station fixed sources to the maximum receptor location. This includes the addition of spent fuel storage in a Dry Fuel Storage (DFS) facility that began operations in July 2008 with the first transfer of spent fuel assemblies into storage arrays. A second transfer of spent fuel assemblies to the DFS occurred between August and September, 2013. A third spent fuel transfer campaign was conducted during September and October of 2017. The DFS facility is located on Seabrook Station property approximately 0.38 miles West-Southwest of the Unit 1 Containment Building. Since there are no other uranium fuel cycle facilities within five miles of Seabrook Station, no additional impacts from sources beyond Seabrook Station need be considered.

The sum of the maximum annual whole body doses to Members of the Public from all exposure pathways for liquid and gaseous effluents, plus the direct external dose from plant and dry fuel storage fixed sources, was 7.95E-02 mrem to a hypothetical individual at or beyond the site boundary. The maximum organ dose (including the thyroid) to any age group from all exposure pathways including direct radiation was 3.44E-01 mrem.

Table B illustrates the total dose projections from all station sources to the maximum potential offsite individual for the year 2019 and demonstrates compliance with the EPA's environmental radiation standard for the uranium fuel cycle per 40 CFR Part 190. (See Table C for total dose as a percentage of annual limits.)

- VI. <u>References</u>
- 1. Regulatory Guide 1.109, Revision 1, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purposes of Evaluating Compliance with 10CFR Part 50, Appendix I", USNRC, October 1977.
- 2. Seabrook Station Program Manual: Offsite Dose Calculation Manual (ODCM), Revision 40.
- 3. Kocher, D.C., "Dose-Rate Conversion Factors for Exposure to Photons and Electrons", Health Physics, Vol. 45, No. 3, Sept. 1983.
- 4. Regulatory Guide 1.111, Revision 1, "Method for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors", USNRC, July 1977.
- 5. Slade, D.H., "Meteorology and Atomic Energy 1968", USAEC, July 1968.
- 6. Hamawi, J.N., "AEOLUS-2 A Computer Code for the Determination of Continuous and Intermittent-Release Atmospheric Dispersion and Deposition of Nuclear Power Plant Effluents in Open-Terrain Sites, Coastal Sites, and Deep-River Valleys for the Assessment of Ensuing Doses and Finite-Cloud Gamma Radiation Exposures", Entech Engineering, Inc., March 1988.
- 7. Regulatory Guide 1.21, Revision 2, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste", USNRC, June 2009.

Table A

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Maximum^(a) Off-Site Doses and Dose Commitments to Members of the Public

				Dose (mrem)	(b)	
Release Type		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Year ^(c) 2019
Liquid Effluents:						
Total Body Dose		1.01E-05	6.29E-06	4.90E-06	1.65E-04	1.86E-04
Max Organ Dose		(1) 1.75E-05 (2)	(1) 1.04E-05 (3)	(1) 1.23E-05 (2)	(1) 1.93E-04 (2)	2.33E-04
Airborne Effluents: Organ Dose from Carbon Tritium, and Particulates		8.67E-02 (4)	8.86E-02 (4)	8.50E-02 (4)	8.34E-02 (4)	3.44E-01
Noble Gases	Beta Air (mrad)	4.68E-07 (5)	2.44E-06 (6)	7.18E-06 (7)	2.16E-05 (6)	3.17E-05
	Gamma Air (mrad)	1.12E-06 (8)	6.59E-06 (6)	1.82E-05 (7)	2.28E-05 (6)	4.87E-05
Direct Dose Offsite From Station Operation ^(e)		0	0	0	0	0
Doses (mrem) at Receptor Lo	cations Inside Site	e Boundary ^(d) :				
Science and Nature Center (S Max Organ Dose (mrem)	W, 488m):	2.12E-06	1.50E-05	7.81E-06	7.00E-06	3.19E-05
The Firing Range (W, 974m) Max Organ Dose		5.52E-05	3.41E-04	1.44E-04	5.37E-05	5.94E-04
The Fitness Center (WSW, 38 Max Organ Dose (mrem)		1.62E-04	7.64E-04	3.21E-04	2.90E-04	1.54E-03

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Table A (continued)

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Maximum^(a) Off-Site Doses and Dose Commitments to Members of the Public

NOTES:

- (a) "Maximum" means the largest fraction of corresponding 10CFR50, Appendix I, dose design objective.
- (b) The numbered footnotes indicate the age group, organ, and location (compass sector and distance from the primary vent in meters) of the critical receptor, where appropriate, based on the most limiting radionuclide dose contributor (C-14).
 - (1) Adult
 - (2) GI-LLI of an adult
 - (3) Bone of a child
 - (4) Bone of a child, W 1252 m
 - (5) ESE 2276 m
 - (6) WSW 1022 m
 - (7) W 1005 m
 - (8) SE 2276
- (c) "Maximum" dose for the year is the sum of the maximum doses for each quarter. This results in a conservative yearly dose estimate, but still well within the limits of 10CFR50.
- (d) For each special receptor location, the whole body and organ doses calculated for the airborne effluent releases were adjusted by the occupancy factors (i.e., 0.0014 for the Science and Nature Center and 0.0416 for the Fitness Center and Firing Range). The most limiting on-site location with respect to dose is estimated to be the Fitness Center located in the Hi-Rise office building due to relatively close location to the plant vent stack.
- (e) Only station sources (both plant and dry fuel storage) are considered since there are no other fuel cycle facilities within five miles of Seabrook Station site. Dosimeter data collected in 2019 for the closest off-site environmental TLD locations in each sector (as listed in Tables B.4-1 and B.4-2 of Seabrook's ODCM) were compared to preoperational data for the same locations. No statistical difference above random background variability which could be attributed to station sources was identified.

Table B

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Total Dose to Maximum Off-Site Individual (40CFR190)

Release Source	Total Body (mrem)	Maximum Organ ^(a) (mrem)
Liquids	1.86E-04	2.33E-04
Noble Gases	3.24E-05	3.24E-05
Gaseous Iodines, Tritium, C-14 & Particulates ($T_{1/2} > 8$ days)	7.93E-02	3.44E-01
Direct Radiation	0	0
Annual Total	7.95E-02	3.44E-01

(a) Maximum organ includes consideration of the thyroid.

Table C

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Receptor	Applicable ODCM Control	Ar	DCM nnual imit	Calculat Annual (2 Dose	019)	Percent of Limit
Offsite						
Liquid Effluents						
Whole Body Dose	C.6.2.1	3	mrem	1.86E-04	mrem	0.0062%
Organ Dose	C.6.2.1	10	mrem	2.33E-04	mrem	0.0023%
Airborne Effluents						
Organ Dose (iodines, H-3, C-14 and part.)	C.7.3.1	15	mrem	3.44E-01	mrem	2.29%
Gamma Air Dose (noble gases)	C.7.2.1	10	mrad	4.87E-05	mrad	0.0005%
Beta Air Dose (noble gases)	C.7.2.1	20	mrad	3.17E-05	mrad	0.00016%
All Station Sources ^(a)						
Whole Body Dose	C.8.1.1	25	mrem	7.95E-02	mrem	0.318%
Organ Dose	C.8.1.1	25	mrem	3.44E-01	mrem	1.38%
Onsite (Science & Nature Center, 488m SW) Organ Dose (iodines, H-3, C-14 and part.)	C.7.3.1 ^(b)	15	mrem	3.19E-05	mrem	0.00021%
Onsite (The Firing Range, 974m W) Organ Dose (iodines, H-3, C-14 and part.)	C.7.3.1 ^(b)	15	mrem	5.94E-04	mrem	0.0040%
Onsite (Fitness Center, 384m WSW) Organ Dose (iodines, H-3, C-14 and part.)	C.7.3.1 ^(b)	15	mrem	1.54E-03	mrem	0.0102%

Calculated 2019 Maximum Doses versus Applicable Limits

(a) The "all station sources" doses are the sum of the whole body doses and maximum organ doses from liquid, noble gas, and gaseous iodines/tritium/carbon-14/particulate releases as well as direct radiation from fixed station sources (both plant facilities and dry fuel storage).

(b) ODCM Part A, Section 10.2 states that the annual effluent report shall include an assessment of the radiation doses from radioactive liquids and gaseous effluents to members of the public due to their activities inside the site boundary during the report period. The referenced limits (C.7.2.1 & C.7.3.1) are the acceptable doses from liquid and gaseous effluents to areas at and beyond the site boundary and are considered to be appropriate for comparison purposes.

Table D

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Sources of the Values of Factors Used in Liquid Dose Equations

Factor	Definition	Source
Uap	Usage factor	Table B.7-1, Station ODCM
Mp	Mixing ratio	Section B.7.1, Station ODCM (value=0.1 for aquatic foods and 0.025 for shoreline)
B _{ip}	Equilibrium bioaccumulation factor	Table A-1, Reg. Guide 1.109
$\mathrm{D}_{\mathrm{aipj}}$	Dose factor	Tables E-11 through E-14, Reg. Guide 1.109
t _p	Nuclide transit time	Table E-15, Reg. Guide 1.109
Kc	Transfer coefficient from water to sediment	Reg. Guide 1.109
t _b	Period of activity buildup in sediment or soil	Table B.7-2, Station ODCM
W	Shoreline width factor	Table A-2, Reg. Guide 1.109 (value = 0.5)

Table E

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Sources of Values for the Factors Used in Dose Equations for Gaseous Releases

Factor	Definition	Source
t _b	Period of activity buildup in sediment or soil	Table B.7-2, Station ODCM
λί	Nuclide decay constant	Kocher (Reference 3)
DFG _{ij}	Ground plane dose factor	Table E-6, Reg. Guide 1.109
[X/Q]	Atmospheric dispersion factor (non-depleted)	Calculated following Reg. Guide 1.111
[X/Q] ^D	Atmospheric dispersion factor (depleted)	Calculated following Reg. Guide 1.111
Ra	Breathing rate	Table B.7-3, Station ODCM
DFA _{ija}	Inhalation dose factor	Tables E-7 through E-10, Reg. Guide 1.109
di	Nuclide deposition rate	Reg. Guide 1.109
Р	Soil surface density	Table B.7-2, Station ODCM
te	Crop, leafy vegetable, or pasture grass exposure period	Table B.7-2, Station ODCM
t _h	Average time from crop harvest to consumption	Table B.7-2, Station ODCM
Y _v	Agricultural productivity by unit area	Table B.7-2, Station ODCM
r	Fraction of deposited activity retained on crops, leafy vegetables, or pasture grass	Table E-15, Reg. Guide 1.109
B _{iv}	Stable element transfer coefficient from soil to produce, leafy vegetable, or pasture grass	Table E-1, Reg. Guide 1.109
р	Fractional equilibrium ratio	Reg. Guide 1.109
Н	Ambient absolute humidity	Table B.7-2, Station ODCM

Table E (continued)

Seabrook Station 2019 Annual Radioactive Effluent Release Report

Sources of Values for the Factors Used in Dose Equations for Gaseous Releases

Factor	Definition	Source
F _m	Stable element transfer coefficient from feed to milk	Tables E-1 and E-2, Reg. Guide 1.109
tr	Average time from feed to milk to consumption	Reg. Guide 1.109
fp	Fraction of the year that animals graze on pasture	Table B.7-2, Station ODCM
fs	Fraction daily feed pasture grass	Table B.7-2, Station ODCM
$\mathrm{F_{f}}$	Stable element transfer coefficient from feed to meat	Table E-1, Reg. Guide 1.109
ts	Average time from meat animal slaughter to consumption	Table E-15, Reg. Guide 1.109
DFI _{ija}	Ingestion dose factor	Tables E-11 through E-14, Reg. Guide 1.109
Uav	Annual intake of produce	Table B.7-3, Station ODCM
Uam	Annual intake of milk	Table B.7-3, Station ODCM
U^{F}_{a}	Annual intake of meat	Table B.7-3, Station ODCM
$\mathrm{U}_{\mathrm{a}}^{\mathrm{L}}$	Annual intake of leafy vegetables	Table B.7-3, Station ODCM
f_{g}	Ingestion rate fractions for garden produce	Reg. Guide 1.109
f_1	Ingestion rate fractions for garden leafy vegetables	Reg. Guide 1.109
λ	Rate constant for activity removal from plant and leaf surfaces by weathering	Table E-15, Reg. Guide 1.109
Q _F	Animal consumption rate	Table E-3, Reg. Guide 1.109

Table F

Seabrook Station 2019 Annual Radioactive Effluent Release Report

	Nearest Resident	Nearest Garden	Milk Animals within 5 Mile Radius
Sector	km (miles)	km (miles)	km (miles)
N	2.78 (1.73)	3.99 (2.48)	
NNE	3.09 (1.92)	3.20 (1.99)	
NE	2.92 (1.82)	4.40 (2.73)	
ENE	2.31 (1.44)	2.53 (1.57)	
Е	2.56 (1.59)		
ESE	2.43 (1.51)		
SE	2.36 (1.46)	4.69 (2.91)	
SSE	1.65 (1.02)		
S	1.21(0.75)	1.25 (0.77)	
SSW	1.12 (0.69)	1.22 (0.76)	
SW	1.13 (0.70)	1.73 (1.08)	
WSW	1.87 (1.16)	2.33 (1.45)	
W	1.25 (0.78)	1.55 (0.96)	
WNW	1.11 (0.69)	3.08 (1.92)	
NW	1.22 (0.76)	3.14 (1.95)	6.93 (4.30)
NNW	1.04 (0.64)	2.07 (1.29)	

Receptor Locations* for Seabrook Station

* Locations based on 2019 Land Use Census.