

May 23, 2008

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

Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
Docket Nos. 50-277 and 50-278

Subject: Response to Request for Additional Information Concerning  
License Amendment Request – Application of Alternative Source Term

References:

1. Letter from Pamela B. Cowan, Exelon Generation Company, LLC, to U. S. Nuclear Regulatory Commission, "License Amendment Request – Application of Alternative Source Term," dated July 13, 2007
2. U.S. Nuclear Regulatory Commission e-mail dated April 14, 2008, Draft Request for Additional Information Regarding License Amendment Request for the Application of Alternative Source Term at Peach Bottom Atomic Power Station, Units 2 and 3

In Reference 1, Exelon Generation Company, LLC (Exelon) submitted an application requesting a change to the Technical Specifications (TS), Appendix A, of Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively. The proposed change was requested to support the application of Alternative Source Term (AST) methodology at PBAPS, Units 2 and 3.

In Reference 2, the Nuclear Regulatory Commission (NRC) requested additional information concerning the PBAPS License Amendment Request (LAR). In particular, the NRC requested that Exelon provide additional information pertaining to meteorological and dose consequence issues related to AST. The enclosure to this letter restates each of the NRC's questions followed by Exelon's response.

Exelon has concluded that the information provided in this response does not impact the conclusions of the: 1) Technical Analysis, 2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or 3) Environmental Consideration as provided in the original submittal (Reference 1).

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There are no regulatory commitments contained within this letter. If you have any further questions or require additional information, please contact Richard Gropp at 610-765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of May 2008.

Respectfully,



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Pamela B. Cowan  
Director – Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Enclosure: Response to Request for Additional Information

cc: Regional Administrator - NRC Region I  
NRC Senior Resident Inspector - PBAPS  
NRC Project Manager, NRR - PBAPS  
Director, Bureau of Radiation Protection - Pennsylvania  
Department of Environmental Protection

w/ Enclosure  
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**ENCLOSURE**

**Peach Bottom Atomic Power Station  
Units 2 and 3  
Docket Nos. 50-277 and 50-278**

**License Amendment Request  
Response to Request for Additional Information**

**Alternative Source Term (AST)**

## **Background**

By letter dated July 13, 2007, Exelon Generation Company, LLC (Exelon) submitted an application requesting a change to the Technical Specifications (TS), Appendix A, of Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively. The proposed change was requested to support the application of Alternative Source Term (AST) methodology at PBAPS, Units 2 and 3.

Subsequently, in an e-mail dated April 14, 2008, the NRC requested additional information concerning certain issues regarding the PBAPS, Units 2 and 3, License Amendment Request (LAR). Exelon committed to provide a response to the request for additional information by May 27, 2008. The specific questions are restated below followed by Exelon's response.

### **NRC Question 1 (AADB RAI 1)**

*For the dose consequence design basis accidents (DBAs) evaluated for the proposed Alternative Source Term (AST) amendment, Exelon listed the design input parameters in Table 4.3.1 for the AST loss of coolant accident (LOCA) analysis. In the comments section of the table, Exelon notes when a parameter is unchanged from the current licensing basis (CLB) value. For other parameters, Exelon provides a Regulatory Guide (RG), NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (SRP) or other regulatory guidance reference. For the remaining revised or new parameters, Table 4.3.1 references a Peach Bottom calculation. For the remaining parameters, where Table 4.3.1 references a Peach Bottom calculation, please provide the regulatory basis for the CLB change or the new AST parameter.*

*Additionally, the NRC staff requests that the licensee provide the information requested above in an expanded Table 4.3.1 for the applicable AST LOCA analysis parameters. (See Regulatory Position 1.3.2 and 1.3.4 of RG 1.183 and Regulatory Issues Summary (RIS) 2006-04).*

### **Response**

The NRC re-analysis guidance in Regulatory Guide (RG) 1.183, Section 1.3.2, for full implementation of an AST, is satisfactorily implemented by complete recalculation of all facility radiological analyses and evaluation of the current design bases affected by the proposed AST characteristics, TEDE dose criteria, and resulting plant modifications. The Design Input Table in Section 5.0 of Calculation PM-1077 lists the current licensing basis (CLB) as-built design input values along with the modified values used in the revised analysis. These values are compatible with the AST characteristics and suitable for the proposed plant modifications. Table 4.3-1 which was included in the PBAPS LAR is a slightly modified version of Section 5.0 of Calculation PM-1077, and provides only the new design input values used in the AST analysis that replace the existing CLB design input values, as required for the NRC technical review. The design input information in Section 5.0 of Calculation PM-1077 is reproduced in Table 4 of this response to provide the NRC the CLB information requested in this RAI. Table 4 is an updated version of Table 4.3-1, which now includes information to clarify whether the regulatory basis was unchanged

or considered as a new assumption in support of AST. The compliance to RG 1.183, Section 1.3.4 requirements is related to the updating of analyses following implementation of the AST, which is not the scope of the proposed license amendment request.

### **NRC Question 2 (AADB RAI 2)**

*The NRC staff requests that the licensee provide the regulatory basis references for revised or new licensing basis parameters for the Peach Bottom AST Fuel Handling Accident (FHA) in Table 4.4-2, as well as the assumptions used for the Control Rod Drop Accident (CRDA) and the assumptions used for the Main Steam Line Break Accident (MSLB). The design basis parameters should be clearly marked as a CLB parameter or a revised or new parameter with the associated regulatory basis referenced.*

### **Response**

As requested, refer to the attached tables in this enclosure for the regulatory basis references for the revised or new licensing basis parameters related to AST for the Fuel Handling Accident (FHA), Control Rod Drop Accident (CRDA), Main Steam Line Break Accident (MSLB), and Loss of Coolant Accident (LOCA). The following tables are included:

- Table 1 includes the information for the FHA
- Table 2 includes the information for the CRDA
- Table 3 includes the information for the MSLB
- Table 4 includes the information for the LOCA

### **NRC Question 3 (AADB RAI 3)**

*In section 4.1.2, Exelon states that, "For the DBA LOCA, all fuel assemblies in the core are assumed to be affected and the core average inventory is used. For DBA events that do not involve the entire core (CRDA and FHA), the fission product inventory of each of the damaged fuel rods is determined by dividing the total core inventory by the number of fuel rods in the core. To account for differences in power level across the core, radial peaking factors are applied in determining the inventory of the damaged rods. For the MSLB event, no fuel damage is postulated to occur."*

*Provide the justification or reference that supports the conclusion that no fuel damage (e.g. fuel does not reach a transition boiling state or critical heat flux) will occur in the event of a MSLB outside containment.*

### **Response**

General Electric (GE) Topical Report NEDO-24708A, "Additional Information Required for NRC Staff Generic Report on Boiling Water Reactors," Revision 1, dated December 1980, provides the reference supporting the current MSLB event model with no fuel damage. PBAPS UFSAR Section 14.6.5.1.3, "Coolant Loss and Reactor Vessel Water Level," indicates that: "...Analysis of fuel conditions reveals that no fuel rod perforations due to high temperature occur during the

*depressurization, even with the conservative assumptions regarding the operation of the recirculation and feedwater systems for the transient steps assumed in the MSLB. MCHFR remains above 1.0 at all times during the transient. No fuel rod failures due to mechanical loading during the depressurization occur because the differential pressures resulting from the transient do not exceed the designed mechanical strength of the core assembly...."*

#### **NRC Question 4 (AADB RAI 4)**

*In its submittal Exelon assumes a value of 0.77% fuel melting for the CRDA. Provide the basis or justification for using the assumed 0.77% fuel melting value for Peach Bottom.*

#### **Response**

The current design basis for fuel damage from a CRDA is based on GE14 10x10 fuel in an 87.33 equivalent fuel pin array. The fuel damage (i.e., number of rods with failed cladding and fuel melting) assumptions correspond to those as documented in GE NEDE-31152P, Revision 7, "General Electric Fuel Bundle Designs," June 2000. Attachment A of previously provided Calculation PM-1057, Revision 1, shows the parameters and breakdown of the fuel damage and subsequent activity released.

#### **NRC Question 5 (AADB RAI 5)**

*In section 4.2.2.3, "Control Room," Exelon assumed the unfiltered in-leakage into the control room (CR) ventilation boundary is the equivalent of the CR intake condition. Provide further reference or justification of this assumption for the Peach Bottom CR dose consequence modeling. Did Exelon evaluate potential infiltration sources other than the CR intake location? For example, was intake or infiltration from areas and structures adjacent to the CR analyzed to determine the most limiting infiltration location (See Regulatory Position 4.2.1 of RG 1.183)?*

#### **Response**

The PBAPS AST LAR Section 4.2.2.3 states, "The infiltration paths were not specifically identified via in-leakage testing via tracer gas." Since the control room was verified to be at a positive pressure with respect to adjacent areas, the in-leakage is through the ventilation system. The ventilation system, including the air supply ducts and fans that are located in the radwaste building adjacent to the control room (CR), becomes the prime source for the unfiltered in-leakage. The Main Control Room Emergency Ventilation (MCREV) system and radwaste building air supplies are located in the vicinity of each other in the west wall of the radwaste building. Therefore, the MCREV system air intake and infiltration use the same  $\chi/Q_s$  per RG 1.194, Section 3.3.3. The LAR Section 4.2.2.3 described the CR response during a LOCA. A parametric study was performed to determine the CR intake flow rate that maximizes the CR dose during the 30 minutes in which MCREV initiation is delayed; the parametric study results are plotted in Figure 1. Per RG 1.183, Section 4.2.1, the CR dose analysis includes the infiltration of 18,500 cfm and 500 cfm during the MCREV initiation delay and following the initiation of the MCREV system, respectively,

as stated in LAR Section 4.3.3 and as shown in Figures 1 and 4. This information is captured in Design Inputs 5.6.4 and 5.6.5 of Calculation PM-1077.

Based on the information provided in this response, the CR dose analysis includes the infiltration from the adjacent radwaste building during and following the MCREV system delay as per RG 1.183, Section 4.1.2. The limiting infiltration  $\chi/Q_s$  are used in the analysis.

#### **NRC Question 6 (AADB RAI 6)**

*In Section 4.4.3 of the submittal, Exelon determined that, "A drop over the reactor well is more limiting than accidents in the spent fuel pool." Provide the reference or detail that shows the drop in the well or as described in the Peach Bottom final safety analysis report (FSAR), "a drop onto the reactor core from the maximum height allowed by the refueling equipment," is the limiting accident (See Regulatory Position 2.4 of RG 1.183).*

#### **Response**

Attachment F of Calculation PM-1059, Revision 2 provides an assessment that determined a drop over the reactor well is more limiting than accidents in the spent fuel pool. In particular, an assessment of a drop onto the reactor core from the maximum height allowed by refueling equipment is the limiting accident at PBAPS. Attachment F from Calculation PM-1059: a) evaluates water coverage for FHAs over the Reactor Well and over the Spent Fuel Pool; b) evaluates impact of water coverages of less than 23 feet for purposes of pool decontamination factor (DF) determination; and c) justifies that a FHA over the Reactor Well is the limiting event.

#### **NRC Question 7 (AADB RAI 7)**

*Appendix B of RG 1.183 allows an overall decontamination factor of 200, for the FHA if the depth of water above the damaged fuel is 23 feet or greater. If the depth of the water is less than 23 feet, the decontamination factor will have to be determined on a case-by-case method as described in Reference B-1 of RG 1.183. Provide either a detailed analysis that proves the statement in Section 4.3 of the Exelon submittal, "that a shorter drop in the fuel pool would result in less radiological release to the containment," or conservatively adjust the decontamination factor used for the FHA to account for water depth less than 23 feet (See Regulatory Position 2.4 of RG 1.183 and Regulatory Position 2 of Appendix B of RG 1.183).*

#### **Response**

Attachment F of Calculation PM-1059, Revision 2, provides an assessment that determined a drop over the reactor well is more limiting than accidents in the spent fuel pool. In particular, an assessment of a drop onto the reactor core from the maximum height allowed by refueling equipment is the limiting accident at PBAPS. Attachment F from Calculation PM-1059: a) evaluates water coverage for FHAs over the Reactor Well and over the Spent Fuel Pool; b) evaluates impact of water coverages of less than 23 feet for purposes of pool DF determination; and c) justifies that a FHA over the Reactor Well is the limiting event.

### **NRC Question 8 (AADB RAI 8)**

*For the LOCA analysis as described in Sections 4.3.11 and 4.3.12, Exelon assumed that the main steam isolation valve (MSIV) leakage source term would have a natural removal efficiency of 50% for elemental iodine in each steam line volume. In addition, Exelon calculated the main steam rate constant ( $\lambda_s$ ) for different piping segments in the MSIV leakage release paths using the 40th percentile aerosol settling velocity. The licensee stated that both assumptions are derived from the Accident Evaluation Report (AEB) 98-03, "Assessment of Radiological Consequences for the Perry Pilot Plant Application Using the Revised (NUREG-1465) Source Term."*

*In RIS 2006-04, "Experience With Implementation Of Alternative Source Terms," the NRC stated that, "For calculation of aerosol settling velocity in the main steamline (MSL) piping of boiling water reactors, some LARs reference AEB 98-03. This is acceptable. However, it is important to note that the report was written based on the parameters of a particular plant and, therefore, the removal rate constant is specific to that plant. Any licensee who chooses to reference these AEB 98-03 assumptions should provide appropriate justification that the assumptions are applicable to their particular design." The RIS further states that, "deposition is strongly dependent upon the thermal and hydraulic conditions in the piping. Given the large uncertainty associated with iodine behavior in piping, deposition of gaseous iodine in piping should be omitted unless appropriate justification is provided (including providing estimates of the thermal and hydraulic conditions in the piping)."*

*In accordance with the guidance in RIS 2006-04, the NRC staff requests that the licensee provide detailed justification for crediting aerosol deposition removal assumptions for Peach Bottom. In this justification, include the analysis methods that Exelon used to validate the assumptions of AEB 98-03 cited in its amendment application.*

### **Response**

#### **Elemental Iodine Removal:**

Gaseous iodine tends to deposit on the piping surface by chemical adsorption. Since elemental iodine is the most reactive, it has the highest deposition rate. The iodine deposited on the surface undergoes both physical and chemical changes and can be re-emitted as an airborne gas (re-suspension) or permanently fixed to the surface (fixation). The RG 1.183, Appendix A, Section 6.5 indicates that Reference A-9 provides acceptable models for deposition of iodine on the pipe surface. Reference A-9 of RG 1.183 uses the following equation to determine the elemental iodine deposition velocity:

$$\begin{aligned} \mu_{ei} &= \text{elemental iodine vapor deposition velocity (cm/s)} \\ &= e^{(2809/T - 12.80 (\pm 0.33))} \end{aligned}$$

Where T = gas temperature ( $^{\circ}$ K)

This equation is the same as equation 30 in the Bixler Model addressed in the RADTRAD3.02 Code Manual (page 212):



$$\mu_{ei} = e^{(2809/T - 12.5)}$$

The post-LOCA drywell temperature is 280°F (Design Input 5.3.1.9). Assuming that the MSIV leakage gas temperature is the same as the drywell temperature:  
 $T = [(280^\circ\text{F} - 32^\circ\text{F}) \times 5/9] + 273 = 410.78^\circ\text{K}$

Solving for the elemental iodine vapor deposition velocity:  
exponential term =  $(2809/T - 12.5) = (2809/410.78 - 12.5) = -5.66$   
 $\mu_{ei} = e^{-5.66} = 0.003483 \text{ cm/s} = 0.0001143 \text{ ft/s}$

When considering the intact main steam pipe header between the RPV nozzle and the outboard MSIV, the elemental iodine removal efficiency is calculated as follows:

Volume of header ( $V_i$ ) (Calculation PM-1077, Sections 7.3.1.3.1, 7.3.1.3.2, and Table 3A)  
 $V_i = 305.12 \text{ ft}^3 + 66.05 \text{ ft}^3 = 371.17 \text{ ft}^3$

Inner surface area of intact main steam pipe header between the RPV nozzle and the outboard MSIV ( $A_i$ ) based on line length ( $L$ ) (Calculation PM-1077, Sections 7.3.1.3.1, and 7.3.1.3.2, and Table 3A)  
 $L = 1.79' + 3.4' + 32.85' + 11.68' + 3.4' + 15.33' + 3.4' + 14.02' + 3.4' + 3.4' + 6.79' + 21.53'$   
 $L = 121.17'$

Inner surface area for elemental iodine adsorption (elemental iodine is adsorbed on the entire piping surface area regardless of its orientation)  
 $A_i = \pi \times D \times L = 3.14 \times 1.977' \times 121.17' = 752.20 \text{ ft}^2$

Elemental iodine adsorption rate

$$\lambda_{ei} = [(\mu_{ei} \times A_i) / V_i] \times 3600 \text{ s/hr}$$
$$\lambda_{ei} = [(0.0001143 \text{ ft/s} \times 752.20 \text{ ft}^2) / 371.17 \text{ ft}^3] \times 3600 \text{ s/hr} = 0.83 \text{ hr}^{-1}$$

Elemental iodine removal efficiency

$\eta_{ei} = 1 - e^{-\lambda_{ei}} = 1 - e^{-0.83} = 1 - 0.436 = 0.564$  or 56.4%, which is greater than the 50.0% (i.e., DF of 2) used in the analysis based on the NRC staff recommendation in the AEB 98-03, Appendix B, page B-3. This elemental iodine removal efficiency is negligibly reduced due to re-suspension of the elemental iodine, which further gets adsorbed on the piping surface during its migration through the main steam piping. It should be noted that the elemental iodine removal efficiency is calculated using the maximum post-LOCA gas temperature, which will be substantially reduced in a short time due to the continuous cooling of the drywell atmosphere and consequently, it further increases the elemental iodine adsorption velocity and removal efficiency.

Based on the derivation for plant-specific elemental iodine removal efficiency in the above section, it is concluded that the use of the elemental iodine removal efficiency of 50% is conservative.

Aerosol Deposition:

The aerosol deposition model in the analysis uses the following information from Appendix A of the AEB 98-03 Report:

1. 40<sup>th</sup> percentile aerosol settling velocity of 0.00081 m/sec.
2. Use of Equations (2), (3), and (4) from Appendix A to calculate the rate constant for settling ( $\lambda_s$ ) and equivalent aerosol removal filter efficiency.

As discussed in AEB 98-03, Appendix A, the settling velocity in the well-mixed volume is mainly a function of aerosol density, aerosol diameter, and shape factor having some uncertainty. Therefore, a Monte Carlo analysis was performed by the NRC to determine the distribution of aerosol settling velocities for the main steam line during in-vessel phase using the ranges and distributions of aerosol density, diameter, and shape factor. The results of the AEB 99-03 Monte Carlo analysis are listed as follows:

Percentile	Settling Velocity $u_s$ (m/sec)	Removal Rate Constant ( $hr^{-1}$ )
60 <sup>th</sup> (average)	0.00148	11.43
50 <sup>th</sup> (median)	0.00117	9.04
40 <sup>th</sup>	0.00081	6.26
10 <sup>th</sup>	0.00021	1.62

For the given well-mixed volume and shape factor, the settling velocity is mainly dependent on the aerosol density and diameter. As can be seen from the above table, the settling velocity gradually increases with the denser and coarser aerosol particles producing a higher gravitational deposition. Per AEB 98-03 (page 11), the NRC also concludes that the use of the 10<sup>th</sup> percentile settling velocity with a well-mixed model is not appropriate because the model did not include the mechanisms such as the thermophoresis, diffusiophoresis, and flow irregularities including the hygroscopicity, which contribute to the additional deposition. Given the conservatism of the well-mixed model, the NRC believed it was acceptable to utilize median settling velocity values (as compared to more conservative values) for deposition parameter.

The settling velocity percentile distribution is derived using the uncertainty ranges associated with the key variables that constitute the settling velocity. The settling velocity percentile distribution is not dependent on any piping configuration or plant-specific thermal hydraulic condition. Therefore, its use is considered acceptable, as consistently accepted by the NRC in the previous Exelon AST license amendments for Clinton, Dresden, Units 2 and 3, Limerick, Units 1 and 2, Quad Cities, Units 1 and 2, and other AST license amendments (e.g., Fermi Unit 2). Only elemental iodine removal depends on the thermal condition inside the main steam pipe, which is discussed in the previous section for derivation of the elemental iodine removal efficiency. The aerosol iodine deposition is driven by the gravitation force. Despite the NRC recommendation of using the 50<sup>th</sup> percentile settling velocity, Exelon conservatively used the 40<sup>th</sup> percentile settling velocity in the analysis to minimize the aerosol deposition.

The 40<sup>th</sup> settling velocity is used with the PBAPS plant-specific projected pipe surface areas and volumes of various horizontal pipe segments to determine the values of rate constants for settling ( $\lambda_s$ ) in Table 5, which are less than the 6.26 hr<sup>-1</sup> removal rate constant derived in AEB 98-03 using the Perry plant-specific piping parameters. The projected surface areas and volumes are calculated in Calculation PM-1077 Sections 7.3.1 and 7.3.2 for Unit 2 and Unit 3, respectively, using the as-built piping isometric drawings and listed in Calculation PM-1077 Tables 3 through 5. Based on the above clarification, it is demonstrated that the removal rate constants in Table 5 are derived using the PBAPS as-built plant-specific parameters.

The aerosol deposition is driven by the natural gravitational force acting on any particle having size and weight. As shown in the AEB 98-03 Equation (5) and as discussed in AEB 98-03, Appendix A, Page A-3, the gravitational aerosol deposition is mainly a function of the aerosol density and diameter for a uniform distribution of the aerosol in a well-mixed volume. The variables in Equation (5) for the settling velocity neither show dependency on thermal condition nor hydraulic condition. It is purely a function of a physical condition that exists in a well-mixed volume under the influence of natural gravitational force. The lower end of settling velocity represents the lightly packed fine aerosol particles with lighter weights, which tend to be less affected by the gravitational force with a smaller removal rate. The upper end of settling velocity represents the highly packed heavier aerosol particles, which tend to be more affected by the gravitational force with a large removal rate. The use of the 40<sup>th</sup> percentile settling velocity indicates that the MSIV leakage is packed largely with finer aerosol particles than heavier particles, which tends to reduce the aerosol deposition and therefore is conservative.

The volumetric flow rates of MSIV leakage for different time intervals are calculated in Calculation PM-1077 Section 7.2. Knowing the rate constants for settling ( $\lambda_s$ ), volumetric MSIV leak rates, and horizontal piping volumes, the time dependent aerosol (particulate) removal efficiencies are calculated using Equations (3) and (4) of AEB 98-03 in Calculation PM-1077 Section 7.4 and listed in Calculation PM-1077 Table 6.

As stated in AEB 98-03, page 11, the well-mixed volume model is inherently conservative because it does not account for many other removal mechanisms that contribute additional deposition of the aerosol. Exelon incorporated the following analytical conservatisms in the analysis:

1. The reactor building (RB) drawdown time is assumed to be 3 minutes instead of the 2 minutes (120 seconds) currently allowed by PBAPS Technical Specification Surveillance Requirement 3.6.1.4.3 (Calculation PM-1077, Figure 2)
2. The containment and ESF leakages are assumed to release directly to the environment at ground level without crediting the SGTS filtration during the drawdown time and through the main stack following the drawdown time without mixing in the RB volume (Calculation PM-1077 Figure 2)
3. The MSIV leakage model includes the following conservatisms:
  - Each MSIV release path consists of two well-mixed volume nodes consistent with AEB 98-03 to eliminate the in-series configuration of the aerosol and elemental iodine removal efficiencies in the multiple volume nodes, which is believed to underestimate the resulting dose.

- The aerosol and elemental iodine removal is not credited in any MSIV steam lines 96 hrs after the onset of a LOCA.
  - Aerosol and elemental iodine removal is not credited in the MSIV failed line between the reactor pressure vessel (RPV) nozzle and outboard MSIV for the entire duration of a LOCA (refer to response RAI 9(a) for the resulting conservative CR dose).
  - The total MSIV leakage is distributed between two worst-case steam lines instead of four lines for the purposes of this analysis.
4. The Main Control Room Emergency Ventilation (MCREV) system initiation is delayed for 30 minutes after onset of a LOCA for all release paths, and a maximum CR unfiltered inleakage of 18,500 cfm is assumed during the initial 0-30 minutes of the LOCA based on the result of a parametric study plotted in Calculation PM-1077 Figure 1.

Based on the technical justification provided in the above section, which already exists in Calculation PM-1077, Exelon believes that the aerosol deposition model in the analysis for the MSIV leakage path is technically appropriate and complies with the guidance in RG 1.183, Section 6.5 and AEB 98-03 in a very conservative manner.

#### **NRC Question 9 (AADB RAI 9)**

*As part of attachment 8 of the July 13, 2007 AST license amendment request (LAR), Exelon provided the AST LOCA Calculation for Peach Bottom (No. PM-1077). On page 13 of the calculation, Exelon states, "A main steam line break in one steam line inside the drywell would maximize the dose contribution from the MSIV leakage."*

*Unlike AEB 98-03, Peach Bottom Calculation No. PM-1077 takes various forms of credit for the piping up to both inboard MSIVs. For the first line modeled (for the purpose of this discussion called SL-A), Peach Bottom credits holdup and dilution for volume V11. For the second line modeled (for the purpose of this discussion called SL-B) Peach Bottom credits holdup, dilution and deposition and plateout for volume V21.*

- a) *The NRC staff requests that the licensee provide justification for crediting holdup and dilution in inboard section of the failed steamline (SL-A), considering that the most limiting failure occurs just prior to the inboard MSIV and that this piping will no longer be connected to the steamline.*
- b) *The NRC staff requests that the licensee provide justification for aerosol and elemental deposition in the inboard piping of SL-B, noting that the methodology applied from AEB 98-03 assumed a quiescent environment where the only forces acting on the aerosol were due to gravitational settling.*

#### **Response**

Section 2.3.3 of Calculation PM-1077 provides reasons why a LOCA through the main steam line break is not a credible event based on the definition of a large break LOCA in 10CFR50, Appendix A and based on the LOCA being the design basis event for the safety-related system design per

PBAPS UFSAR Section 6.2. The LOCA through a breach in the main steam line is a less limiting event because it does not impose the maximum challenge to the drywell pressure boundary (resulting in considerably less MSIV leakage) and because it does not impose the maximum challenge to fuel integrity in the entire core (resulting in a very small source term release). The steam lines are ASME Category I piping, which further exclude the postulation of a break in the piping in the inboard and outboard MSIV areas. Based on the above facts, the break in the steam lines inside the drywell is not credible during a LOCA. The postulating of a steam line break during a LOCA increases the resulting MSIV leakage dose. The concept of main steam line break in the MSIV failed line is incorporated in the LOCA analysis as discussed in the following section.

Response To AADB RAI 9(a):

The PBAPS AST MSIV leakage model is identical to the AEB 98-03 MSIV leakage model, with aerosol depositions in the MSIV failed and intact main steam lines calculated based on the horizontal projected piping surface areas and volumes using the PBAPS plant-specific piping configuration. The comparison of both models is shown in Table A below with the resulting PBAPS CR dose of 3.11 Rem TEDE. As discussed in Section 2.3.3 of Calculation PM-1077, although a break in the steam lines inside the drywell is not credible during a LOCA, the concept of a main steam line break is analytically incorporated just to add additional conservatism in the MSIV leakage model, without physically breaking the steam line.

Table B below documents a sensitivity evaluation in which the PBAPS MSIV leakage model neither postulates the break in main steam line segment between the RPV nozzle and outboard MSIV in the MSIV-failed release path nor credits the removal of the aerosol and elemental iodine in that pipe segment. The AEB 98-03 MSIV leakage model in Table B is the same as that in Table A below. The differences between Tables A and B (PBAPS MSIV leakage path models) are shown in Table B using a bold and italic font style with the resulting PBAPS CR dose of 4.36 Rem TEDE. This dose is 1.25 Rem TEDE higher than the PBAPS MSIV leakage path when it is modeled and is identical to the AEB 98-03 model, as shown in Table A. Despite the differences in the modeling techniques, the MSIV leakage path modeled in the PBAPS LOCA analysis in Calculation PM-1077 is grossly conservative.

**Table A**  
**Peach Bottom Plant-specific MSIV Leakage Model - 100% Compliance With AEB 98-03 Methodology**

Variable Parameter	AEB 98-03				Peach Bottom AST Analysis - Parametric Study					
	MSIV Failed Line		Intact Line		MSIV Failed Line			Intact Line		
	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	Between Inboard MSIV & TSV	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	Between Inboard MSIV & TSV
Piping Integrity Assumed	Ruptured - not credited in analysis	Remains Intact	Remains Intact	Remains Intact	Ruptured - not credited in analysis	Remains Intact	Remains Intact	Remains Intact	Remains Intact	Remains Intact
Aerosol Deposition	Not Credited	Credited	Credited	Credited	Not Credited	Credited	Credited	Credited	Credited	Credited
Piping Volume	Not Credited	Credited	Credited	Credited	Not Credited	Credited	Credited	Credited	Credited	Credited
Holdup Time	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited
Deposition Velocity Distribution	40th Percentile				40th Percentile					
Elemental Iodine Removal	Not Credited	Credited (50%)	Credited (50%)	Credited (50%)	Not Credited	Credited (50%)	Credited (50%)	Credited (50%)	Credited (50%)	Credited (50%)
CR Dose	Not Provided				<b>3.11 Rem TEDE</b>					

Perry plant does not have the seismically supported main steam line beyond the outboard MSIV. Therefore, unlike the Peach Bottom Plant, the main steam line between the outboard MSIV and TSV is not modeled.

**Table B**  
**Peach Bottom Plant-specific MSIV Leakage Model - Used In Licensing Basis AST LOCA Analysis**

Variable Parameter	AEB 98-03				PBAPS Plant-specific Licensing Basis AST LOCA Analysis					
	MSIV Failed Line		Intact Line		MSIV Failed Line			Intact Line		
	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	Between Inboard MSIV & TSV	RPV To Inboard MSIV	Between Inboard & Outboard MSIVs	Between Inboard MSIV & TSV
Piping Integrity Assumed	Ruptured - not credited in analysis	Remains Intact	Remains Intact	Remains Intact	<i>Remains Intact*</i>	Remains Intact	Remains Intact	Remains Intact	Remains Intact	Remains Intact
Aerosol Deposition	Not Credited	Credited	Credited	Credited	Not Credited	<i>Not Credited</i>	Credited	Credited	Credited	Credited
Piping Volume	Not Credited	Credited	Credited	Credited	<i>Credited</i>	Credited	Credited	Credited	Credited	Credited
Holdup Time	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited	Not Credited
Deposition Velocity Distribution	40th Percentile				40th Percentile					
Elemental Iodine Removal	Not Credited	Credited (50%)	Credited (50%)	Credited (50%)	Not Credited	<i>Not Credited</i>	Credited (50%)	Credited (50%)	Credited (50%)	Credited (50%)
CR Dose	Not Provided				<i>4.36 Rem TEDE</i>					

\*The Peach Bottom licensing basis AST LOCA analysis neither postulates the rupture of the main steam line between the RPV nozzle and outboard MSIV nor credits the deposition of aerosol and removal of elemental iodine in that line, which produces approximately 1.25 Rem TEDE additional dose to CR operator, proving that the PBAPS MSIV leakage model is conservative in comparison to the AEB 98-03 MSIV leakage model.

Response To AADB RAI 9(b):

Only one single failure is required to be postulated for a given release path. Therefore, the intact main steam line takes credit for elemental and aerosol iodine removal in well-mixed volume  $V_2$  ( $V_2 = V_{21} + V_{22}$ ), which consists of the second shortest piping segment between the RPV nozzle and outboard MSIV as shown in Calculation PM-1077 Table 6. The additional analytical conservatism is not applied to this well-mixed volume. As discussed in the response to AADB RAI9(a), the aerosol deposition credited in all main steam pipe segments complies with the regulatory guidance in RG 1.183, Appendix A, Section 6.5 and AEB 98-03 in a very conservative manner. Based on the clarification that only one single failure is required to be postulated for the MSIV leakage release, the modeling of intact steam line between the RPV nozzle and outboard MSIV is technically correct.

**NRC Question 10 (AADB RAI 10)**

*On page 12 of Peach Bottom Calculation No. PM-1077, Exelon states, "To account for the assumed mixing between the wetwell and drywell after 2 hours and the resulting activity dilution, the flow rate through the MSIVs is reduced by the ratio of the drywell volume to the total volume at two hours."*

*Explain in detail how this assumption was used in the MSIV leak rate calculations for Peach Bottom and any deviation from regulatory position 6.2 of Appendix A of RG 1.183.*

**Response**

The activity in the MSIV leakage paths is the same as the activity released inside the drywell during a LOCA. During the first two hours of a LOCA the gap and early-in-vessel phase activity released from the core is conservatively assumed to distribute in the drywell air volume only. Two hours after onset of a LOCA, the non-condensable gases buildup in the suppression chamber air space purges into the drywell air space via continuously opened vacuum breakers based on the setpoint of 0.2 psid. The drywell and suppression chamber air spaces reach an equilibrium condition. It is assumed that two hours after a LOCA the activity in the drywell is uniformly distributed in the combined drywell plus suppression chamber air volumes. This provides the dilution of activity released through the containment and MSIV leakage paths. This dilution is conservatively not accounted for in the containment leakage release but it is incorporated in the MSIV leakage release by reducing the MSIV leakage by the ratio of the drywell volume to the total volume to incorporate the dilution of drywell activity 2 hours after a LOCA as shown in Section 7.2.3 and Table 7 of Calculation PM-1077. The NRC in previous Exelon AST license amendments, and other non-Exelon license amendment (e.g., Fermi Unit 2), accepted the uniform distribution of activity among the drywell and suppression chamber air spaces 2 hours after onset of a LOCA.

As required by RG 1.183, Appendix A, Section 6.2, a site-specific analysis was performed to determine the reduction in primary containment leakage based on the post-LOCA containment pressure in Reference 9.17 of Calculation PM-1077. It was determined that the containment and MSIV leakages can be reduced to 50% of the technical specifications leak rate 38 hours after the



onset of a LOCA. The reduction in the MSIV leak rate is calculated in Calculation PM-1077 Section 7.2.4, as listed in Table 7, and incorporated in the RADTRAD input file.

Based on the above discussion, the MSIV leakage is appropriately reduced to comply with the RG 1.183, Appendix A, Section 6.2 requirement.

**NRC Question 11 (AADB RAI 11)**

*For the LOCA analysis described in Section 4.3.3, Exelon credits elemental iodine removal by wall deposition on wetted surfaces inside containment. Provide the basis for crediting iodine removal without crediting containment sprays for Peach Bottom.*

**Response**

The gaseous elemental iodine tends to deposit on any surface by chemical adsorption. On the wetted surface area, the gaseous elemental is removed quickly because it is dissolved in water and chemically adsorbed on the surface area. The various exposed surfaces in the drywell get wet during a LOCA due to depressurization of a large amount of reactor coolant that immediately flashes into steam. As the accident progresses, the release through the break becomes a two phase flow mixture of steam and water, and at a later time it becomes a saturated liquid. The moisture released during and following a LOCA is continuously condensed on the relatively colder surfaces including but not limited to the drywell wall, floor, and ceiling concrete surfaces, various piping surfaces, duct and equipment surfaces, and Torus water surface. The drywell spray is not credited in the analysis; therefore, the resulting additional wetted surface area due to the drywell spray operation is not accounted for in the wetted surface estimate in Calculation PM-1077 Section 7.7. The estimated wetted surface area is conservatively reduced by 25% and compared with the corresponding wetted surface areas of Exelon's other BWR Mark I plants, Dresden and Quad Cities, to establish a conservative basis for the selection of its value. The elemental iodine removal in the MSIV leakage follows the similar adsorption mechanism as that in the drywell with an exception that a large amount of the gaseous elemental iodine in the drywell is dissolved on the wetted surface and removed from the drywell atmosphere while all elemental iodine is removed by adsorption on the pipe surface area. The elemental iodine vapor deposition velocity and adsorption rate constant  $\mu_{el}$  (ft/sec) and  $\lambda_{el}$  ( $hr^{-1}$ ) for the MSIV leakage (refer to response to RAI 8) and mass-transfer coefficient and first order removal coefficient  $K_w$  (meter/hr) and  $\lambda_w$  ( $hr^{-1}$ ) for the drywell atmosphere are technically analogous to each other and perform the same function of removal of the elemental iodine via different removal mechanisms.

Based on the technical justification provided in the above discussion, the elemental iodine removal mechanism by the wetted drywell surface areas without crediting operation of the drywell spray is technically adequate and accepted by the NRC staff in the previous AST license amendments including the Dresden and Quad Cities AST license amendments.

**NRC Question 12 (AADB RAI 12)**

*As shown on Sheet 1 of both Attachments A and B of Peach Bottom Calculation No. PM-1055, Revision 0, (PM-1055), Attachment 8 to the July 13, 2007 AST LAR, topography near the Peach*

*Bottom site is complex. The facility is located on the shore of the Susquehanna River adjacent to a bluff. The licensee postulated effluent releases from multiple locations, including from short stacks on top of facility structures, locations at or near ground level at the facility, and from the 152 meter off-gas stack on the bluff. The licensee used meteorological data from three towers to generate atmospheric dispersion factors ( $\chi/Q$  values), namely from the River Tower based in the Susquehanna River, Tower 1A near the shore in the vicinity of the Peach Bottom facility structures, and Tower 2 on the bluff. Table 2-2 on page 7 and Table 3-4 on page 13 of PM-1055 list which data were used to model  $\chi/Q$  values for each postulated release location. In some cases, two sets of data were used to generate  $\chi/Q$  values for a single release/receptor pair and the limiting  $\chi/Q$  values were selected for use in the dose assessment.*

*Page 13 of PM-1055 states that the Peach Bottom Reactor Building (RB) stack exclusion area boundary (EAB)  $\chi/Q$  values were generated using meteorological data from the River Tower. Both the EAB and low population zone (LPZ) values were generated using meteorological data from Tower 2. The licensee apparently did not generate LPZ  $\chi/Q$  values using data from the River Tower noting that those data measured local conditions that are likely not representative of conditions at the LPZ. While this may be the case, given that the initial effluent dispersion would occur in the river valley environment near the Peach Bottom facility, how was it determined that use of meteorological data from Tower 2 only would be adequate to generate the LPZ  $\chi/Q$  values?*

*Page 59 of Attachment 1 to the LAR states that the RB stack EAB and LPZ  $\chi/Q$  values are considered applicable for postulated releases from the personnel access door, railway bay door, reactor building scuttle, and ground level hatch. The personnel access door, railway bay door, and ground level hatch appear to be at a height more nearly representative of the height of measurements on Tower 1A. Please provide further detailed justification that the RB stack EAB and LPZ  $\chi/Q$  values are adequately representative of releases from these locations.*

## **Response**

The River Tower and Tower 1A meteorological data were not utilized for the LPZ X/Q analysis of the RB Units 2 and 3 stacks in Calculation PM-1055. The RB stack tops are at 305 ft msl, essentially above the Valley's meteorological influences. As discussed in Calculation PM-1055, Section 3.2.4.2, and depicted in Calculation PM-1055 Attachment B, the RB stack tops at 305 ft msl are vertically much nearer the Tower 2 grade elevation of 367 ft msl than the River at 116 ft msl. Accordingly, the wind direction at the Tower 2 location, only about 500 feet south-southwest of the RB Units 2 and 3 would also correspond much better with wind flow at the RB stack tops than the River Tower (or Tower 1A). Unlike the area within the 823-meter radius EAB, for much of which the elevation is at or near river level, the great majority of area within the 7300-meter radius LPZ is well above the River.

As such, neither the winds from the River Tower or Tower 1A, nor the stability class from Tower 1A would well represent the conditions for which maximum X/Q at the LPZ would be expected to occur. The basis for applying the River Tower wind data and Tower 1A stability data for the EAB X/Q analysis in Calculation PM-1055 properly takes into account the non-elevated release assumption required by RG 1.145, implying the potential for building-enhanced plume spread (which relative effect on X/Q is as inverse function of downwind distance) and thus for such a

condition to occur in the Valley in the immediate vicinity of the Station. This effect would be insignificant at the LPZ distance, and not associated with its maximum predicted X/Q. For the above reasons Tower 2 meteorological data were determined to be representative for this analysis of LPZ X/Qs.

While the Tower 2 based ground level release EAB X/Q result would also be considered applicable for releases from the Reactor Building TB/RB Vent Stack and the Roof Scuttle, this value is not used. All Reactor Building release pathways, whether at the roof elevation, or near plant grade (*personnel access door, railway bay door, and ground level hatches*) were evaluated using the River Tower wind data and Tower 1A stability data for the EAB since no stability data is measured at the River Tower. This applies to the FHA, CRDA, and LOCA analyses. MSLB analysis uses a more conservative Regulatory Guide 1.5 approach.

### **NRC Question 13 (AADB RAI 13)**

*Joint wind speed, wind direction and atmospheric stability distributions (JFDs) provided in Attachment J and used in the PAVAN calculations group the meteorological data into wind speed categories of 0.5, 3.5, 7.5, 12.5, 18.5, 20 and 55 miles per hour based upon RG 1.23, Revision 0, "Onsite Meteorological Programs," February 1972. NRC staff notes that use of these categories results in much of the Peach Bottom data being clustered into only a few wind speed classes in some of the JFDs (e.g., page 1169). Data clustering may skew the distribution of calculated  $\chi/Q$  values. Therefore, NRC Regulatory Issue Summary (RIS) 2006-04, "Experience with Implementation of Alternative Source Terms," March 7, 2006, and RG 1.23, Revision 1, "Meteorological Monitoring Programs for Nuclear Power Plants," March 2007, recommend that JFDs have a large number of wind speed categories at the lower wind speeds in order to produce the best results. Suggested categories are calm, 0.5, 0.75, 1.0, 1.25, 1.5, 2.0, 3.0, 4.0, 5.0, 6.0, 8.0 and 10.0 meters per second. Please provide information to show that the use of the RG 1.23, Revision 0, wind speed categories has not biased the resultant  $\chi/Q$  value distributions. However, if the resultant  $\chi/Q$  value distributions have been biased, then provide information that demonstrates that the  $\chi/Q$  values generated using the RG 1.23, Rev. 0, wind speed categories are more limiting than those generated using a large number of wind speed categories at the lower wind speeds.*

### **Response**

The joint wind speed, wind direction, atmospheric stability frequency distributions (JFDs) used by PAVAN in generating the X/Q values provided in Calculation PM-1055 were evaluated with the 11 wind speed categories, in accordance with RG 1.23, Revision 1, as shown in Attachment A, Sheet 3 of 6; and also shown for comparison are the 7 wind speed categories according to RG 1.23, Revision 0. Attachment B contains the JFDs for the 11 wind speed categories.

The revised JFDs were then used to re-calculate the X/Q values for each release-receptor scenario previously run with the RG1.23, Revision 0 JFDs. As Attachment A, Sheets 1, 2, and 4 illustrate for each scenario, the 11-bin JFDs resulted in slightly increased X/Q values for each time-averaging period.

The table provided in Attachment A, Sheet 5 of 6 presents the higher of the RG 1.23, Revision 0 and RG 1.23 Revision 1 PAVAN results for the Off-Gas Stack to Control Room Intake Scenario. Also presented are the ARCON96 X/Q results for the same scenario as taken from Calculation PM-1055. The PAVAN results are used in conjunction with the ARCON96 results to produce the final Off-Gas Stack to Control Room Intake X/Q values according to the methodology in RG 1.194, Section 3.2.2.

Attachment A, Sheet 6 of 6 presents a revision to Table 4-1 of Calculation PM-1055, as updated to indicate the higher X/Q values resulting from the additional PAVAN analyses produced in response to AADB RAI 13.

Attachment C contains the PAVAN input and summary output pages associated with each scenario.

Since the 11-bin X/Q results are slightly higher than the 7-bin results and the fact that the calculated doses are substantially lower than regulatory limits, Exelon will evaluate the need to calculate the resulting new dose consequences using the 11-bin X/Qs upon performance of the next dose calculation revision.

#### **NRC Question 14 (AADB RAI 14)**

*The LAR provided  $\chi/Q$  values for postulated releases from the reactor building (RB) stack, main steam line, personnel access door, railway bay door, reactor building scuttle, ground level hatch, and off-gas stack to the control room air intake, EAB and LPZ. The licensee used the  $\chi/Q$  values as inputs to dose assessments for the LOCA, CRDA, MSLB, and FHA design basis accidents.*

*RG 1.183 states that the single active component failure that results in the most limiting radiological consequences should be assumed. Assumptions regarding the occurrence and timing of a loss of offsite power should be selected with the objective of maximizing the postulated radiological consequences. Please confirm that the locations identified above are the limiting release/receptor pairs for all design basis accident scenarios, including those postulated to involve loss of offsite power or other single failures.*

#### **Response**

Releases from openings in secondary containment were considered and evaluated as indicated for postulated releases from the reactor building (RB) stack, main steam line, personnel access door, railway bay door, reactor building scuttle, ground level hatch, and off-gas stack. These release points were evaluated with respect to the control room air intake, EAB and LPZ. Plant walk-downs and reviews of plant general arrangement and layout drawings were performed to ensure that X/Qs for the most limiting of the release locations identified were analyzed. The most limiting X/Q values associated with these openings were utilized in the appropriate radiological dose analyses. No credit is taken for the loss of offsite power if it is beneficial. No accident was determined to be aggravated by the presence or loss of offsite power. The mitigative systems credited have been determined to be single-failure proof and powered by emergency power systems. Specifically, for each accident:

LOCA: The presence or loss of offsite power would not adversely impact the postulated release to containment, the release mechanism from containment, or the behavior of credited mitigative systems.

FHA: The availability of offsite power would not adversely impact the release from the spent fuel pool or release from the refuel floor airspace to the environment. Control room dose modeling with an artificial one air change per minute envelopes all possible control room ventilation and related power supply conditions.

MSLB: The analysis of this event does not take credit for the presence of offsite power or the lack thereof. The sole plant feature credited is the MSIV closure instrumentation, whose loss would result in valve closure. Control room dose modeling with an artificial one air change per minute envelopes all possible control room ventilation and related power supply conditions.

CRDA: Two CRDA scenarios are addressed. The path associated with the 1%/day release from the condenser is passive and requires no power. The path through the offgas system assumes offsite power availability. Loss of offsite power for this path would either revert to the first path, or would trap release activity in the charcoal delay beds, providing additional uncredited delay.

#### **NRC Question 15 (AADB RAI 15)**

*Page 74 of Attachment 1 to the LAR states, "As calculated in the PAVAN run, at the conservatively assumed 823 meter EAB distance  $\sigma_y$  is 38.3 ..." for Pasquill stability class F. However, NRC staff notes that a printout from a PAVAN run, page 1199 of PM-1055, lists a  $\sigma_y$  value of 31.0 meters which can also be estimated from Figure 1 of RG 1.145, "Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants." Therefore, please justify use of 38.3 meters for the  $\sigma_y$  value or provide a revision to this calculation.*

#### **Response**

As requested, the calculation has been revised. As shown in the revised MSLB Calculation PM-1058 Revision 1, attached in this enclosure, the calculated EAB dose increases proportionately to the ratio of the  $\sigma_y$  values noted; i.e.  $38.3 \text{ m} / 31.0 \text{ m} = 1.24$ , and the calculated dose increases from the Case 2 (Iodine spike) 1.60 rem TEDE value to a still quite acceptable 1.97 rem TEDE value, remaining well-below the Regulatory Guide 1.183 TEDE acceptance limit of 6.3 rem TEDE.

#### **NRC Question 16 (AADB RAI 16)**

*Sheet 4 of 5 of Attachment H to PM-1055 is a JFD that shows a total frequency occurrence of approximately 94.5 percent in the lower right corner of the table. Sheets 1-3 and 5 of Attachment H which provide similar JFDs for other meteorological data each total 100 percent. Why is the total on Sheet 4 less than 100 percent and what is the significance?*

**Response**

The JFD contained on Sheet 4 of 5 of Attachment H to Calculation PM-1055 has been corrected and is included herein as Attachment D. This error was editorial in nature and did not impact the X/Q calculations.

**NRC Question 17 (AADB RAI 17)**

*NRC staff notes that there appears to be some duplication of pages in Attachment J to the LAR. For example, summary pages 1228 and 1353 appear to be identical, as are pages 1285 and 1410. Please review the information in Attachment J and confirm that all relevant pages were included or provide supplementary pages, if appropriate.*

**Response**

Attachment J to Calculation PM-1055 includes information that was inadvertently duplicated. The PAVAN output information contained on pages 1228 through 1285 was duplicated on pages 1353 through 1410. However, no information was omitted and all pertinent documentation was provided.

**NRC Question 18 (AADB RAI 18)**

*Figure 3-1 of Attachment G to Calculation No. PM-1055, Revision 2, is a plant plan showing postulated source and receptor locations. What is the scale of this figure? NRC staff had some difficulty regarding the clarity of the figure. Therefore, please provide another copy that more clearly highlights the locations of the sources and receptors.*

**Response**

Figure 3-1 of Attachment G, which depicts the postulated source and receptor locations, is part of Calculation PM-1059, Revision 2. To address the NRC's request, refer to Figures 1 and 2 in this response, which more clearly highlight the source and receptor locations. Figure 1 is the general arrangement plan for the 135-foot elevation at PBAPS and Figure 2 is a floor plan for the 135-foot elevation. The figures are not to scale since they are reduced copies, but dimensions are depicted for reference purposes.

**NRC Question 19 (AADB RAI 19)**

*In RIS 2006-04, the NRC advised licensees on the implementation of alternative source terms (ASTs) in design basis accident (DBA) radiological analyses of currently licensed light water reactors. In order to enhance the efficiency and potentially the timeliness of completing our review, the NRC staff requests a RIS Summary 2006-04 conformance table.*

**Response**

As requested, Table 5 in this response includes information concerning conformance to the guidance specified in Regulatory Issue Summary (RIS) 2006-04, "Experience with Implementation of Alternative Source Terms."

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**Table 1**

Updated Table 4.3-1

Parameters Applicable to AST Fuel Handling Accident Dose  
 Considerations for Peach Bottom Atomic Power Station

Use of new parameters is acceptable per FHA results below the Regulatory Limit as found within  
 previously provided Calculation PM-1059, Revision 2

<b>Updated Table 4.3-1 (FHA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
Reactor Power	3528 MWth	3528 MWth  3514 MWth nominal	No change. Includes the currently licensed 0.38% margin for instrument uncertainty relative to the rated thermal power of 3514 MWt after the 1.62% thermal power optimization uprate.
Fuel Assembly Configuration and properties	10 x 10 in an 87.33 fuel pin bundle and 172 total pins damaged	10 x 10 in an 87.33 fuel pin bundle and 172 total pins damaged	No change. Bounding current assumptions for current PBAPS licensing basis FHA as well as for AST.
Radial Peaking Factor	1.7	1.5	NEW bounding assumption, which is considered conservative. RG 1.183 justifies this change.
Allowable Fuel Burnup and non-LOCA gap fractions	RG 1.183, Table 3. Fuel bundle peak burnup will not exceed 62 GWD/MTU. For fuel exceeding 54 GWD/MTU, the maximum linear heat generation rate will not exceed 6.3 kW/ft.	N/A	NEW per RG 1.183. Some peak rod-average burnups can exceed 54 GWD/MT. However, the 6.3 kW/ft linear heat generation rate limit will not be exceeded. This data is reviewed for each cycle.



<b>Updated Table 4.3-1 (FHA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
FHA Radionuclide Inventory	From the 60 isotopes forming the RADTRAD library used in the Loss of Coolant Accident (LOCA) analysis, with decay to 24 hours. Gap activities are per RG 1.183.	TID-14844	NEW design basis analysis used ORIGEN 2.1 to calculate values. Spent fuel source terms are based on the same bounding reactor core source terms as were used for the LOCA analysis. Use is based on RG 1.183 guidance. The Radionuclide inventory from the previous analysis was based on TID 14844 assumptions.
Underwater Decontamination Factor	Noble Gases: 1  Particulate (cesiums and rubidiums): infinity  Iodine: 200, corresponding to a 23-ft water depth for an assembly drop into the reactor vessel	Noble Gases: 1  Particulates: infinity  Iodine: 100	NEW, per RG 1.183. For conservatism, the effective minimum depth of 23 feet is assumed to be the water coverage over the reactor core. This is the worst-case location for a fuel drop FHA to take place (significantly more damage is produced than a shorter drop in the fuel pool).
Iodine chemical distribution	The chemical form of radioiodine released from the fuel to the spent fuel pool is assumed to be 95% CsI, 4.85% elemental iodine, and 0.15% organic iodide. 95% CsI, instantaneously dissociates in the pool water. All iodine is re-evolved as elemental iodine.	TID-14844	NEW, per RG 1.183. Since the pH of the pool water is not maintained above 7, iodine species is assumed to be commensurate with charcoal filtration only where credited. The design basis FHA calculation uses only gaseous iodine (no particulate).
Activity Transport to the Environment	Activity reaching the refuel floor airspace will essentially be all exhausted within 2 hours by using an artificially high exhaust rate.	Puff release with a two-hour duration through SGTS.	NEW, per RG 1.183. All (99.9999%) activity is exhausted to the environment within 2 hours. This also provides an allowance for uneven mixing in the refuel floor

<b>Updated Table 4.3-1 (FHA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
			airspace.
Release Pathways	Activity reaching the refuel floor airspace will essentially be all exhausted within 2 hours by using an artificially high exhaust rate. The release pathways are described in Table 4-1.	Filtration by SGTS with elevated release through the Main Stack.	NEW assumption. For conservatism, no credit is taken for filtration by the SGTS, or the elevated release resulting from exhaust through the Peach Bottom Main Stack.
Dose Conversion Factors	EPA Federal Guidance Reports 11 and 12	ICRP60 Dose conversion Factors, RG 1.109	NEW, per RG 1.183 implemented in RADTRAD.
Offsite Dose Limit	6.3 rem TEDE	6.25 rem Whole Body 75 rem Thyroid	NEW, per 10CFR 50 Appendix A, and RG 1.183.
Control Room Dose Limit	5 rem TEDE for the duration of the accident	5 rem Whole Body, or its equivalent to any part.	NEW, Per 10 CFR50 Appendix A, GDC 19 and 10 CFR50.67
CR Volume	Volume 176,000 ft <sup>3</sup>	Volume 176,000 ft <sup>3</sup>	No change.
MCREV Operation for release from ground hatch	MCREV operability is required in order to account for the most limiting grade level hatch plugs that could be opened during movement of irradiated fuel that has been irradiated less than 84 hours. 3000 cfm -10% filtered intake (sensitivity analyses show the lower bound of the 10% flow uncertainty is conservative) plus an allowance of 500 cfm for unfiltered inleakage.	Required.	NEW assumption, which is considered conservative per RG 1.183. The assumed 500 cfm bounds the tracer gas test results. Note, the measured tracer gas test value was statistically zero. However, the upper tolerance value of uncertainty is assumed for conservatism.

Updated Table 4.3-1 (FHA Parameters)			
Parameter or Method	AST Value	Pre-AST and Current Licensing Basis	Regulatory Basis and Comments
Refuel Floor Ventilation Rate and Volume	An artificial volume of 100 ft <sup>3</sup> with an artificially high exhaust rate is assumed for simplicity. This evacuates 99.99999% of all activity within 2-hours.	Exhaust flow via SGTS	NEW assumption, which is considered conservative per RG 1.183.
CR Limiting X/Qs (0-2 hrs)	Limiting X/Qs (0 – 2 hr)  Personnel Access Doors: 1.04E-03 sec/m <sup>3</sup>  Railroad Bay Doors: 4.54E-03 sec/m <sup>3</sup>  RB Roof Scuttle: 1.90E-03 sec/m <sup>3</sup>  Ground Level Hatch 4: 1.28E-02 sec/m <sup>3</sup>	Current licensing basis value is not appropriate with AST assumptions.	NEW, AST values utilize ARCON96 assumptions per RG 1.194. Values used are the highest values for either Unit 2 or Unit 3 for conservatism.
EAB  Release Point Basis  Limiting Dispersion Factors (0 – 2 hr)	Normal RB exhaust stack  4.25E-04 sec/m <sup>3</sup>	Main exhaust stack	NEW assumption, which is considered conservative. Current licensing basis value is not appropriate with AST assumptions.
LPZ  Release Point Basis and  Limiting Dispersion Factors (0 – 8 hr)	Normal RB exhaust stack  4.81E-05 sec/m <sup>3</sup>	Main exhaust stack	NEW assumption, which is considered conservative. Current licensing basis value is not appropriate with AST assumptions.

**Table 2**

Updated Table 4.3-1

Parameters Applicable to AST Control Rod Drop Accident Dose  
 Considerations for Peach Bottom Atomic Power Station

Use of new parameters is acceptable per Control rod Drop Accident results below the Regulatory  
 Limit as found within previously provided Calculation PM-1057, Revision 1.

<b>Updated Table 4.3-1 (CRDA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
Reactor Power	3528 MWth	3528 MWth  3514 MWth nominal	No change. Includes the currently licensed 0.38% margin for instrument uncertainty relative to the rated thermal power of 3514 MWt after the 1.62% thermal power optimization uprate.
Allowable Fuel Burnup and non-LOCA gap fractions	RG 1.183, Table 3.  Fuel bundle peak burnup will not exceed 62 GWD/MTU, the maximum linear heat generation rate will not exceed 6.3 kW/ft for fuel with greater than 54 GWD/MTU.	N/A	NEW, Per RG 1.183. The current licensing basis bounding fuel damage assessment scenario, which is associated with a drop over the reactor core, is used and meets the requirements of RG 1.183, footnote 11.
Number of Failed Fuel Rods	1200 pins of equivalent 10x10 fuel in an 87.33 equivalent fuel pin array	330 pins on 7x7 basis as the bounding evaluation.	NEW bounding assumption, which is considered conservative.
Number of fuel rods in full core	66,720.12 (87.33 pins/assembly x 764 assemblies in core)	66,720.12 (87.33 pins/assembly x 764 assemblies in core)	No change.
Radial Peaking Factor	1.7	1.5	NEW bounding assumption, per RG 1.183.
Gap activity Release Potential with Peaking	0.030575 (0.017986 x 1.7)	N/A	NEW, per RG 1.183.
Fraction of Fuel in	0.0077	0.0088 (for gap and	NEW, per GE document

<b>Updated Table 4.3-1 (CRDA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
Failed Rods assumed to melt		melt fractions combined)	NEDO-31400A, "Safety Evaluation for Eliminating the Boiling Water Reactor Main Steam Isolation Valve Closure Function and Scram Function of the Main Steam Line Radiation Monitor."
Melted Fuel activity release fraction with peaking	0.000235 (0.030575 x 0.0077)		NEW, gap fractions per RG 1.183.
CRDA Radionuclide Inventory	From the 60 isotopes forming the standard RADTRAD library, with decay to 24 hours. Gap activities are per RG 1.183.	TID 14844	NEW design basis analysis used ORIGEN 2.1 to calculate values. Spent fuel source terms are based on the same bounding reactor core source terms as were used for the LOCA analysis. Use is based on RG 1.183 guidance. The Radionuclide inventory from the previous analysis was based on TID 14844 assumptions.
Dose Conversion Factors	EPA Federal Guidance Reports 11 and 12	ICRP60 Dose conversion Factors, RG 1.109	NEW, per RG 1.183 implemented in RADTRAD.
Offsite Dose Limit	6.3 rem TEDE	6.25 rem Whole Body 75 rem Thyroid	NEW, per 10CFR 50 Appendix A, and RG 1.183.
Control Room Dose Limit	5 rem TEDE for the duration of the accident	5 rem Whole Body, or its equivalent to any part.	NEW, Per 10 CFR50 Appendix A, GDC 19 and 10 CFR50.67
CR Volume	Volume 176,000 ft <sup>3</sup>	Volume 176,000 ft <sup>3</sup>	No change.
Isotopic Release Fractions From Fuel	10% of the core inventory of noble gases is released from the fuel gap. Other nuclide groups contained in the gap are released per RG		NEW assumption, which is considered conservative per RG 1.183.

<b>Updated Table 4.3-1 (CRDA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
	1.183, Table 3.  100% noble gases and 50% iodines from melted fuel.  All activity released from the fuel mixes instantaneously with the reactor coolant.		
Activity transported to the Turbine/Condenser	100% of all noble gases, 10% of the iodines, and 1% of the remaining nuclides		NEW assumption, which is considered conservative per RG 1.183.
Activity available for release from the Turbine/Condenser	100% of all noble gases, 10% of the iodines, and 1% of the remaining nuclides		NEW assumption, which is considered conservative per RG 1.183.
CR occupancy factor	1	1	No change
CR Breathing Rate	3.5E-04	3.47E-04	NEW, Per RG 1.183
CR Unfiltered Inleakage	1600 cfm	Current licensing basis value is not appropriate with AST assumptions.	NEW, Per RG 1.183
CR Normal (unfiltered) Intake Flow	20,600 cfm	Current licensing basis value is not appropriate with AST assumptions.	NEW, Per RG 1.183
Offsite Breathing Rate	3.5 E-04 0-8 hr 1.8 E-04 8-24 hr	3.47 E-04 1.75 E-04	NEW assumption, which is considered conservative per RG 1.183
CR Limiting X/Qs	Limiting X/Qs 0 – 2 hr: 1.18E-03 sec/m <sup>3</sup> 2 - 8 hr: 9.08E-04 sec/m <sup>3</sup> 8 - 24 hr: 4.14E-04 sec/m <sup>3</sup>	Current licensing basis value is not appropriate with AST assumptions.	NEW, AST values utilize ARCON96 assumptions per RG 1.194. Values used are the highest values for either Unit 2 or Unit 3 for conservatism.

<b>Updated Table 4.3-1 (CRDA Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
EAB Release Point Basis Limiting Dispersion Factors	0 – 2 hr: 4.25E-04 sec/m <sup>3</sup>	Current licensing basis value is not appropriate with AST assumptions.	NEW assumption, which is considered conservative. Current licensing basis value is not appropriate with AST assumptions.
LPZ	0 – 8 hr: 2.08E-05 sec/m <sup>3</sup> 8 – 24 hr: 1.37E-05 sec/m <sup>3</sup>	Current licensing basis value is not appropriate with AST assumptions.	NEW assumption, which is considered conservative. Current licensing basis value is not appropriate with AST assumptions.

**Table 3**

Updated Table 4.3-1

Parameters Applicable to AST Main Steam Line Break Accident Dose  
 Considerations for Peach Bottom Atomic Power Station

Use of new parameters is acceptable per Main Steam Line Break accident results below the  
 Regulatory Limit as found within previously provided Calculation PM-1058, Revision 0

<b>Updated Table 4.3-1 (MSLB Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
Reactor Power	3528 MWth	3528 MWth  3514 MWth nominal	No change. Includes the currently licensed 0.38% margin for instrument uncertainty relative to the rated thermal power of 3514 MWt after the 1.62% thermal power optimization uprate.
Amount of Fuel Damage as a result of the MSLB	No fuel damage	No fuel damage	No change.
Iodine Activity Assumed in Reactor Coolant	Two cases (I-131 DEI): Iodine spike = 0.2 uCi/g Equilibrium Iodine = 4.0 uCi/g	Two cases (I-131 DEI): Iodine spike = 0.2 uCi/g Equilibrium Iodine = 4.0 uCi/g	No change. From UFSAR Section 14.6.5.2.1
CR HVAC	No emergency filtration system credit in AST analysis for conservatism	Rapid emergency HVAC actuation with filtration	NEW, Per RG 1.183.
MSIV closure time	10.5 seconds	10.5 seconds	No change. Per UFSAR section 14.6.5.1.1



<b>Updated Table 4.3-1 (MSLB Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
Flashing Fraction of Liquid Water released	40%	N/A	NEW, per RG 1.183.
Fraction of liquid water contained in the steam	2%	2%	No change. Maximum carryover in steam to turbine
Mass release Data	Steam: 25,800 lb Liquid Water: 165,120 lb	Steam: 25,800 lb Liquid Water: 165,120 lb	No change. Per UFSAR Section 14.9.1.5
Iodine distribution	I-131 0.17 uCi/cc I-132 1.02 uCi/cc I-133 1.04 uCi/cc I-134 1.47 uCi/cc I-135 1.30 uCi/cc	I-131 0.17 uCi/cc I-132 1.02 uCi/cc I-133 1.04 uCi/cc I-134 1.47 uCi/cc I-135 1.30 uCi/cc	No change. From UFSAR Section 14.6.5.2.1
Noble Gas Distribution	Kr-83m:1.92E-03 uCi/g Kr-85m:3.44E-03 uCi/g Kr-85: 1.13E-05 uCi/g Kr-87: 1.13E-02 uCi/g Kr-88: 1.13E-02 uCi/g Kr-89: 7.33E-02 uCi/g Xe-131m: 8.46E-06 uCi/g Xe-133m: 1.63E-04 uCi/g Xe-133: 4.62E-03 uCi/g Xe-135m: 1.47E-02 uCi/g Xe-135: 1.24E-02 uCi/g Xe-137: 8.46E-02 uCi/g Xe-138: 5.02E-02 uCi/g	Kr-83m:1.92E-03 uCi/g Kr-85m:3.44E-03 uCi/g Kr-85: 1.13E-05 uCi/g Kr-87: 1.13E-02 uCi/g Kr-88: 1.13E-02 uCi/g Kr-89: 7.33E-02 uCi/g Xe-131m: 8.46E-06 uCi/g Xe-133m: 1.63E-04 uCi/g Xe-133: 4.62E-03 uCi/g Xe-135m: 1.47E-02 uCi/g Xe-135: 1.24E-02 uCi/g Xe-137: 8.46E-02 uCi/g Xe-138: 5.02E-02 uCi/g	No change
Control Room Occupancy Factor	1	1	No change
Dose Conversion Factors	EPA Federal Guidance Reports 11 and 12	ICRP60 Dose conversion Factors, RG 1.109	NEW, per RG 1.183 implemented in RADTRAD.
Offsite Dose Limit	Iodine Spike: 25 rem TEDE	Iodine Spike: 25 rem Whole	NEW, per 10

<b>Updated Table 4.3-1 (MSLB Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
	Equilibrium Iodine: 2.5 rem TEDE	Body, 300 rem Thyroid Equilibrium Iodine: 2.5 rem, Whole Body and 30 rem Thyroid	CFR 50 Appendix A, and RG 1.183.
Control Room Dose Limit	5 rem TEDE for the duration of the accident	5 rem Whole Body, or its equivalent to any part.	NEW, Per 10 CFR 50 Appendix A, GDC 19 and 10 CFR 50.67
CR Volume	Volume 176,000 ft <sup>3</sup>	Volume 176,000 ft <sup>3</sup>	No change.
Release Pathway	<p>Ground level release from a double-ended rupture of a main steam pipe.</p> <p>The released steam plume is modeled as a hemispherical volume (cloud). This cloud is then carried towards the CR air intake by the wind at 1 meter per second. Inhalation doses based on concentrations at the CR air intake as the cloud passes by.</p> <p>Offsite doses use dispersion estimates as calculated using RG 1.5.</p>	Directly to the environment 30m above grade.	NEW assumption, which is considered conservative as justified in design analysis (PM-1058).
CR Limiting X/Qs	Limiting X/Qs - N/A Hemispherical cloud model used	Current licensing basis value is not appropriate with AST assumptions.	NEW assumption, which is considered conservative as justified in design analysis (PM-1058).

<b>Updated Table 4.3-1 (MSLB Parameters)</b>			
<b>Parameter or Method</b>	<b>AST Value</b>	<b>Pre-AST and Current Licensing Basis</b>	<b>Regulatory Basis and Comments</b>
EAB  Limiting Dispersion Factors	4.29E-04 sec/m <sup>3</sup> (Recalculated value)	Current licensing basis value is not appropriate with AST assumptions.	NEW assumption, which is considered conservative. Current licensing basis value is not appropriate with AST assumptions.
LPZ	5.97E-05 sec/m <sup>3</sup>	Current licensing basis value is not appropriate with AST assumptions.	NEW assumption, which is considered conservative. Current licensing basis value is not appropriate with AST assumptions.

**Table 4**

Updated Table 4.3-1

Peach Bottom Atomic Power Station  
AST Design Inputs Used in the LOCA Analysis  
(Updated with Current Licensing Basis Data and Justifications for Changes)

<b>Updated Table 4.3-1 (LOCA Parameters)</b>					
<b>Design Input Parameter</b>		<b>AST Value Assigned</b>		<b>Comments</b>	
Containment Leakage Model Parameters					
<u>Source Term</u>					
Thermal Power Level		3,528 MWt (includes 0.38% margin relative to rated thermal power of 3,514 MWt)		Unchanged from currently licensed value	
Extended Cycle Fuel Core Average Burnup		37.7 GWD/MTU		Unchanged from currently licensed value	
<b>Isotopic Core Inventory (Ci/MWt)</b> (New Design Analysis values calculated using ORIGEN 2.1 for AST)					
Isotope	Ci/MW <sub>t</sub>	Isotope	Ci/MW <sub>t</sub>	Isotope	Ci/MW <sub>t</sub>
CO-58*	1.529E+02	RU-103	4.202E+04	CS-136	2.027E+03
CO-60*	1.830E+02	RU-105	2.908E+04	CS-137	4.538E+03
KR-85	3.946E+02	RU-106	1.730E+04	BA-139	5.084E+04
KR-85M	8.313E+03	RH-105	2.752E+04	BA-140	4.896E+04
KR-87	1.633E+04	SB-127	2.896E+03	LA-140	5.019E+04
KR-88	2.303E+04	SB-129	8.638E+03	LA-141	4.640E+04
RB-86	6.518E+01	TE-127	2.873E+03	LA-142	4.532E+04
SR-89	2.798E+04	TE-127M	3.855E+02	CE-141	4.492E+04
SR-90	3.178E+03	TE-129	8.501E+03	CE-143	4.427E+04
SR-91	3.801E+04	TE-129M	1.267E+03	CE-144	3.596E+04
SR-92	4.017E+04	TE-131M	3.869E+03	PR-143	4.293E+04
Y-90	3.272E+03	TE-132	3.821E+04	ND-147	1.838E+04
Y-91	3.448E+04	I-131	2.687E+04	NP-239	5.397E+05
Y-92	4.029E+04	I-132	3.881E+04	PU-238	1.796E+02
Y-93	4.526E+04	I-133	5.556E+04	PU-239	1.200E+01
ZR-95	4.489E+04	I-134	6.165E+04	PU-240	1.288E+01
ZR-97	4.657E+04	I-135	5.192E+04	PU-241	6.182E+03
NB-95	4.512E+04	XE-133	5.491E+04	AM-241	9.528E+00
MO-99	5.078E+04	XE-135	2.228E+04	CM-242	2.388E+03
TC-99M	4.447E+04	CS-134	7.280E+03	CM-244	2.602E+02
* CO-58 & CO-60 activities are obtained from RADTRAD User's Manual, Table 1.4.3.2-3 (NUREG/CR-6604)					

**Updated Table 4.3-1 (LOCA Parameters)**

<b>Design Input Parameter</b>	<b>AST Value Assigned</b>	<b>Comments</b>
<b>Radionuclide Composition</b>		
<b>Group</b>	<b>Elements</b>	<b>Comments</b>
Noble Gases	Xe, Kr	<b>New assumption per RG 1.183, Section 3.4, Table 5</b>
Halogens	I, Br	
Alkali Metals	Cs, Rb	
Tellurium Group	Te, Sb, Se	
Barium, Strontium	Ba, Sr	
Noble Metals	Ru, Rh, Pd, Mo, Tc, Co	
Lanthanides	La, Zr, Nd, Eu, Nb, Pm, Pr, Sm, Y, Cm, Am	
Cerium	Ce, Pu, Np	
<b>Timing of Release Phase (New Assumption per RG 1.183, Section 3.3, Table 4)</b>		
<b>Phase</b>	<b>Onset</b>	<b>Duration</b>
Gap Release	2 min	0.5 hr
Early In-Vessel Release	0.5 hr	1.5 hr
<b>BWR Core Inventory Fraction Released into Containment (New Assumption per RG 1.183, Section 3.2, Table 1)</b>		
<b>Group</b>	<b>Gap Release Phase</b>	<b>Early In-Vessel Release Phase</b>
Noble Gases	0.05	0.95
Halogens	0.05	0.25
Alkali Metals	0.05	0.20
Tellurium Metals	0.00	0.05
Ba, Sr	0.00	0.02
Noble Metals	0.00	0.0025
Cerium Group	0.00	0.0005
Lanthanides	0.00	0.0002
<b>Iodine Chemical Form Released to the Containment</b>		
Aerosol (Csl)	95%	<b>New assumption per RG 1.183, Sections 3.5 and A.2</b>
Elemental	4.85%	
Organic	0.15%	
Post-LOCA Drywell Pressure	49.1 psig	<b>Unchanged</b> from currently licensed value
Post-LOCA Drywell Temperature	280°F	Reference 7.36, Section 8.3.4 <b>Unchanged</b> from currently licensed value

**Updated Table 4.3-1 (LOCA Parameters)**

<b>Design Input Parameter</b>	<b>AST Value Assigned</b>	<b>Comments</b>
<b>Activity Transport in Primary Containment</b>		
Minimum Drywell Air Volume	159,000 ft <sup>3</sup>	UFSAR Table 5.2.1 <b>Unchanged</b> from currently licensed value
Minimum Suppression Chamber Free Air Volume	127,700 ft <sup>3</sup>	UFSAR Table 5.2.1 <b>Unchanged</b> from currently licensed value
Drywell plus Suppression Chamber Free Air Volume	286,700 ft <sup>3</sup> (159,000 ft <sup>3</sup> + 127,700 ft <sup>3</sup> )	<b>Unchanged</b> from currently licensed value
Containment Elemental Iodine Removal Model	Standard Review Plan 6.5.2	<b>New assumption per SRP 6.5.2</b> , Page 6.5.2-10
Drywell Surface Area for Deposition/Plateout Model	33,200 ft <sup>2</sup>	<b>New Conservative assumption as justified in Reference 7.37</b> Section 7.7.
Particulate (Aerosol) Deposition/Plateout Model	Powers' 10 percentile model	<b>New assumption per NUREG/CR-6604</b> (conservative application)
Containment Leak Rate into Reactor Building	0.700 w%/day for 2 min to 38 hrs 0.350 w%/day for > 38 hrs	<b>New requirement per TS 5.5.12</b> as <b>justified in Reference 7.37</b> .
Containment Drawdown Time	≤ 180 seconds (3 minutes)	<b>New assumption as justified in Reference 7.37</b>
SGT System Flow Rate	10,500 cfm	TS SR 3.6.4.1.4 <b>Unchanged</b> from currently licensed value
Reactor Building Volume	2,500,000 ft <sup>3</sup>	<b>Unchanged</b> from currently licensed value
<b>ESF Leakage Model Parameters</b>		
Minimum Suppression Pool Water Volume	122,900 ft <sup>3</sup>	<b>Unchanged</b> from currently licensed value
Sump Water Activity (New Assumption <b>per RG 1.183</b> , Sections A.5.1, A.5.3 & Tables 1 & 4)		
<b>Group (RG 1.183)</b>	<b>Gap Release Phase (RG 1.183)</b>	<b>Early In-Vessel Release Phase (RG 1.183)</b>
Timing Duration (Hrs)	2 min – 0.50 Hr (Conservatively earlier than actual end time of 0.52 hours)	0.50 – 2.0 Hr
Halogen	0.05	0.25
ESF Leakage Rate	10.0 gal/min (= 2 × 5.0 gal/min allowable leakage rate)	<b>New assumption to establish a new design basis</b> (as used in Reference 7.37) and applied per RG 1.183, Section A.5.2. <b>Justified in Reference 7.37</b> .
ESF Leakage Initiation Time and Duration	0 to 30 days	<b>New conservative assumption justified in Reference 7.37</b>
Suppression Pool Scrubbing	New assumption - Not credited	<b>RG 1.183</b> , Section A.3.5

<b>Updated Table 4.3-1 (LOCA Parameters)</b>		
<b>Design Input Parameter</b>	<b>AST Value Assigned</b>	<b>Comments</b>
Long-Term Suppression Pool Water pH	> 7.0	<b>New Calculated value PM-1056, Rev. 0</b> (Reference 7.33), page 11 and 9.1, Section A.2. No value previously calculated.
ESF Leakage Maximum Temperature	< 212 <sup>o</sup> F	<b>Unchanged</b> from currently licensed value
Fraction of Iodine in ESF Leakage that becomes Airborne	0.10	<b>New assumption per RG 1.183 justified with Torus water temperature &lt; 212<sup>o</sup>F</b>
<b>Chemical Form of Iodine in ESF Leakage</b>		
Elemental	97%	New assumption <b>per RG 1.183</b> , Section A.5.6
Organic	3%	
<b>MSIV Leakage Model Parameters</b>		
Total MSIV Leak Rate Through All Four Lines	360 scfh for < 38 hrs @ 49.1 psig (180 scfh for > 38 hrs)	<b>New assumption justified in Reference 7.37</b> (CLB value used is 46 scfh)
MSIV Leak Rate Through One Line With MSIV Failed	205 scfh for < 38 hrs @ 49.1 psig (102.5 scfh for >38 hrs)	<b>New assumption justified in Reference 7.37</b> - maximum leakage rate through any one line (CLB only has 46 scfh total)
<b>MSIV Leak Rate Through Three Intact Lines</b>		
First Intact Line	155 scfh for < 38 hrs @ 49.1 psig (77.5 scfh for > 38 hrs)	<b>New assumption justified in Reference 7.37</b> - remainder of unallocated leakage
Second Intact Line	0 scfh for < 30 days @ 49.1 psig	<b>New assumption justified in Reference 7.37</b> - remainder of unallocated leakage
Third Intact Line	0 scfh for < 30 days @ 49.1 psig	<b>New assumption justified in Reference 7.37</b> - remainder of unallocated leakage
Natural Removal Efficiency For Elemental Iodine In Each Steam Line Volume	50 percent	<b>New assumption justified in Reference 7.37</b> per AEB 98-03, Appendix B, page B-3 (Previous value not appropriate for AST)
<b>Control Room Model Parameters</b>		
CR Envelope Pressure Boundary Free Volume	176,000 ft <sup>3</sup>	<b>Unchanged</b> from currently licensed value

**Updated Table 4.3-1 (LOCA Parameters)**

<b>Design Input Parameter</b>	<b>AST Value Assigned</b>	<b>Comments</b>
MCREV Filtration System Actuation Time Following a LOCA	30 minutes	<b>New conservative assumption Justified in Reference 7.37</b> (Provides conservative time for unfiltered intake prior to initiation of emergency HVAC system.)
CR Emergency Ventilation Mode Air Intake Rate	3,000 cfm ± 10% 2,700 cfm maximizes dose	<b>Unchanged</b> from currently licensed value (TS 5.5.7). <b>AST values based on worst-case tolerance values</b> (nominal values previously used).
CR Unfiltered Inleakage during Normal Operation (< 0.5 hr)	18,500 cfm (includes ingress/egress inleakage of 10 cfm)	<b>New conservative assumption Justified based on Parametric Study in Attachment 1, Figure 1 of Reference 7.37.</b>
CR Unfiltered Inleakage during Emergency Ventilation Mode (> 0.5 hr)	<b>500 cfm</b> (includes ingress/egress inleakage of 10 cfm)  <b>369 cfm by tracer gas testing (Note: The measured value was statistically zero. However, the upper tolerance value was used instead of zero for conservatism.)</b>	<b>New conservative assumption justified in Reference 7.37.</b>  NCS Corporation Report for Control Room Envelope Inleakage Testing At Peach Bottom Atomic Power Station, 2004, (Reference 7.38)
<b>CR Emergency Ventilation Mode Intake Charcoal and HEPA Filter Efficiencies</b>		
Elemental Iodine	89% (CLB used 90%)	<b>New conservative assumption Justified in Reference 7.37, Section 7.11.</b>
Organic Iodide	89% (CLB used 90%)	
Particulate Aerosols	98% (CLB used 99%)	
<b>CR <math>\chi/Q</math>s For Containment &amp; ESF Leakage Release Via Off-Gas Stack Release (CLB values not appropriate for AST)</b>		
<b>Time</b>	<b>X/Q (sec/m<sup>3</sup>)</b>	<b>New values from Design Analysis (Reference 7.32).</b> 24-96 hrs $\chi/Q$ value is conservatively used for 2-24 hrs $\chi/Q$ values.
0-2	2.72E-06	
2-8	1.46E-08	
8-24	1.46E-08	
24-96	1.46E-08	
96-720	4.21E-09	



**Updated Table 4.3-1 (LOCA Parameters)**

<b>Design Input Parameter</b>	<b>AST Value Assigned</b>	<b>Comments</b>
<b>CR X/Qs For MSIV Leakage Release Via Unit 2 TB/RB Exhaust Vent (CLB values not appropriate for AST)</b>		
<b>Time</b>	<b>X/Q (sec/m<sup>3</sup>)</b>	
0-2	1.18E-03	<b>New values from Design Analysis</b> (Reference 7.32). The higher Unit 2 RB Stack $\chi/Q$ values are conservative for use on Unit 3
2-8	9.08E-04	
8-24	4.14E-04	
24-96	2.90E-04	
96-720	2.26E-04	
<b>CR Occupancy Factors and Breathing Rate</b>		
<b>Time (Hr)</b>	<b>%</b>	
0-24	100	<b>No change</b> from currently used values (per RG 1.183, Section 4.2.6)
24-96	60	
96-720	40	
CR Breathing Rate	3.5E-04 m <sup>3</sup> /sec	<b>New value per RG 1.183</b> , Section 4.2.6 (CLB used 3.47E-04)
<b>Offsite Dose Receptor Release Model Parameters</b>		
<b>EAB X/Qs For Containment &amp; ESF Leakage Release Via Off-Gas Stack Release (CLB values not appropriate for AST)</b>		
<b>Time (hrs)</b>	<b>X/Q (sec/m<sup>3</sup>)</b>	
0-0.5	5.30E-05	<b>New values from Design Analysis</b> (Reference 7.32).
0.5-2	8.89E-06	
2-720	8.89E-06	<b>New values from Design Analysis</b> (Reference 7.32) and used per RG 1.183, Section 4.1.5 (0.5-2 hr $\chi/Q$ value conservatively modeled after 2 hours)
<b>EAB X/Q For MSIV Leakage Release (CLB values not appropriate for AST)</b>		
<b>Time (hrs)</b>	<b>X/Q (sec/m<sup>3</sup>)</b>	
0-2	4.25E-04	<b>New values from Design Analysis</b> (Reference 7.32)
2-720	4.25E-04	<b>New values from Design Analysis</b> (Reference 7.32) and used per RG 1.183, Section 4.1.5 (0-2 hr $\chi/Q$ value conservatively modeled after 2 hours)
EAB Breathing Rate	3.5E-04 m <sup>3</sup> /sec	<b>RG 1.183</b> , Sections 4.1.3 & 4.1.5 (Previously used 3.47E-04)

Updated Table 4.3-1 (LOCA Parameters)		
Design Input Parameter	AST Value Assigned	Comments
<b>LPZ X/Qs For Containment &amp; ESF Leakage Release Via Off-Gas Stack Release (CLB values not appropriate for AST)</b>		
<b>Time (hrs)</b>	<b>X/Q (sec/m<sup>3</sup>)</b>	
0-0.5	1.75E-05	<b>New calculated values from Design Analysis (Reference 7.32)</b>
0.5-2	8.87E-06	
2-8	3.94E-06	
8-24	2.62E-06	
24-96	1.09E-06	
96-720	3.06E-07	
<b>LPZ X/Qs For MSIV Leakage Release Via Unit 2 TB/RB Exhaust Vent (CLB values not appropriate for AST)</b>		
<b>Time (hrs)</b>	<b>X/Q (sec/m<sup>3</sup>)</b>	
0-2	4.81E-05	<b>New calculated values from Design Analysis (Reference 7.32)</b>
2-8	2.08E-05	
8-24	1.37E-05	
24-96	5.49E-06	
96-720	1.49E-06	
<b>LPZ Breathing Rates</b>		
<b>Time (hrs)</b>	<b>BR (m<sup>3</sup>/sec)</b>	
0-8	3.5E-04	<b>New assumption per RG 1.183, Sections 4.1.3 and 4.4 (Previously used unrounded values)</b>
8-24	1.8E-04	
24-720	2.3E-04	

**Table 5**

RIS 2006-04 Conformance Table  
Peach Bottom Atomic Power Station

RIS Issue	Licensee Comments
<b>1. Level of Detail Contained in LARs</b>	
(1) The AST amendment request should provide justification for each individual proposed change to the technical specifications (TS).	Provided in Section 2.0 of the Licensee's Evaluation for each individual proposed change to the TS.
(2) The AST amendment request should identify and justify each change to the licensing basis accident analyses.	Section 2.0 of the Licensee's Evaluation provides an overview justification. Section 4.0 and 5.0 provide the detailed justification. Updated Table 4.3-1 (included in this RAI Response) provides further clarity.
(3) The AST amendment request should contain enough details (e.g., assumptions, computer analyses input and output) to allow the NRC staff to confirm the dose analyses results in independent calculations.	Sufficient detail in tabular format is provided in Section 4.0 of the Licensee's Evaluation to allow the NRC staff to confirm the dose analyses results in independent calculations. In addition, the dose consequence calculations submitted contain computer input and output information to allow the NRC staff to confirm the dose analyses results in independent calculations.
Licensees should identify the most current analyses, assumptions, and TS changes in their submittal and supplements to the submittal.	The most current analyses, assumptions, and TS changes are identified throughout Attachment 1 of the License Amendment Request.
<b>2. Main Steam Isolation Valve (MSIV) Leakage and Fission Product Deposition in Piping</b>	
Any licensee who chooses to reference these AEB 98-03 assumptions should provide appropriate justification that the assumptions are applicable to their particular design.	This amendment request references the basic methodology used in the Perry Plant Application. However, it uses site-specific parameters and PBAPS design considerations.
If appropriate justification is provided, the suppression pool free air volume may be included provided there is a mechanism to ensure mixing between the drywell and wetwell.	This mixing is discussed in the design basis LOCA Calculation
For aerosol settling, only horizontal sections of piping should be credited.	Only horizontal sections of piping are credited for aerosol deposition.
Given the large uncertainty associated with iodine behavior in	Deposition of elemental iodine is credited and justified. No

<b>RIS Issue</b>	<b>Licensee Comments</b>
<p>piping, deposition of gaseous iodine in piping should be omitted unless appropriate justification is provided (including providing estimates of the thermal and hydraulic conditions in the piping).</p>	<p>deposition of organic iodine in the MSIV leakage path is credited.</p>
<b>3. Control Room Habitability</b>	
<p>Use of non-ESF ventilation systems during a DBA should not be assumed unless the systems have emergency power and are part of the ventilation filter testing program in Section 5 of the TS.</p>	<p>No credit is taken for use of non-ESF ventilation systems during a DBA unless the operation of such a system (e.g., reactor building normal exhaust) makes it worse.</p>
<p>Generic Letter (GL) 2003-01, "Control Room Habitability" requested licensees to confirm the ability of their facility's control room to meet applicable habitability regulatory requirements. The GL placed emphasis on licensees confirming that the most limiting unfiltered inleakage into the control room envelope (CRE) was not greater than the value assumed in the DBA analyses.</p>	<p>Unfiltered inleakage testing was performed using the tracer gas method in response to GL 2003-01. The test indicated that the inleakage was statistically zero.</p>
<p>Some AST amendment requests proposed operating schemes for the control room and other ventilation systems which affect areas adjacent to the CRE and are different from the manner of operation and performance described in the response to the GL without providing sufficient justification for the proposed changes in the operating scheme.</p>	<p>Control room and other ventilation systems, which affect areas adjacent to the CRE and are the same as the operation and performance described in the response to the GL.</p>
<b>4. Atmospheric Dispersion</b>	
<p>Licensees have the option to adopt the generally less conservative (more realistic) updated NRC staff guidance on determining X/Q values in support of design basis control room radiological habitability assessments provided in RG 1.194, "Atmospheric Relative Concentrations for Control Room Radiological Habitability Assessments at Nuclear Power Plants".</p>	<p>CR X/Q values for releases were calculated using the computer code ARCON96, the methods of Regulatory Guide 1.194, and as supplemented using PAVAN.</p>
<p>Regulatory positions on X/Q values for offsite (i.e., exclusion area boundary and low population zone) accident radiological consequence assessments are provided in RG 1.145, "Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants".</p>	<p>The X/Q values for offsite locations were evaluated using PAVAN and the methods of Regulatory Guide 1.145.</p>

RIS Issue	Licensee Comments
The submittal should include a site plan showing true North and indicating locations of all potential accident release pathways and control room intake and unfiltered inleakage pathways (whether assumed or identified during inleakage testing).	Appropriate plot plan showing true north is included in the design basis X/Q calculation provided (Attachments C and D of the Calculation PM-1055) and as supplemented in this response.
The submittal should include a justification for using control room intake X/Q values for modeling the unfiltered inleakage, if applicable.	The most limiting X/Q is used for CR unfiltered inleakage as described in response to Question 5.
The submittal should include a copy of the meteorological data inputs and program outputs along with a discussion of assumptions and potential deviations from staff guidelines. Meteorological data input files should be checked to ensure quality (e.g., compared against historical or other data and against the raw data to ensure that the electronic file has been properly formatted, any unit conversions are correct, and invalid data are properly identified).	The revised X/Q values used for the AST application have been developed using appropriate meteorological data.
When running the control room atmospheric dispersion model ARCON96, two or more files of meteorological data representative of each potential release height should be used if X/Q values are being calculated for both ground-level and elevated releases.	Two levels of meteorological data used in the calculation of ground level and elevated X/Qs have been provided.
In addition, licensees should be aware that (1) two levels of wind speed and direction data should always be provided as input to each data file, (2) fields of "nines" (e.g., 9999) should be used to indicate invalid or missing data, and (3) valid wind direction data should range from 1° to 360°.	(1) Two levels of wind speed data are used where appropriate. (2) Invalid or missing data are correctly indicated using a field of "nines." (3) Wind direction data is from 1 to 360 degrees.
Licensees should also provide detailed engineering information when applying the default plume rise adjustment cited in RG 1.194 to control room X/Q values to account for buoyancy or mechanical jets of high energy releases.	No such adjustments are made relative to this LAR.
This information should demonstrate that the minimum effluent velocity during any time of the release over which the adjustment	N/A

RIS Issue	Licensee Comments
is being applied is greater than the 95th percentile wind speed at the height of release.	
When running the offsite atmospheric dispersion model PAVAN, two or more files of meteorological data representative of each potential release height should be used if X/Q values are being calculated for pathways with significantly different release heights (e.g., ground level versus elevated stack).	Five (5) years of meteorological data were used in the calculation.
The joint frequency distributions of wind speed, wind direction, and atmospheric stability data used as input to PAVAN should have a large number of wind speed categories at the lower wind speeds in order to produce the best results.	See response to question 13.
<b>5. Modeling of ESF Leakage</b>	
The radiological consequences from the postulated [ESF] leakage should be analyzed and combined with consequences postulated for other fission product release paths to determine the total calculated radiological consequences from the [loss-of-coolant accident] LOCA.	ESF leakage is analyzed and combined with the consequences postulated for other fission product release paths to determine the total calculated radiological consequences from the LOCA.
Licensees should account for ESF leakage at accident conditions in their dose analyses so as not to underestimate the release rate.	ESF leakage was accounted for at accident conditions.
In Appendix A to RG 1.183, Regulatory Position 5.5, the NRC staff provided a conservative value of 10 percent as the assumed amount of iodine that may become airborne from ESF leakage that is less than 212°F.	The RG 1.183 recommended value of 10% is used. The suppression pool pH value remains above 7.0 for the 30-day duration of the accident. Suppression pool temperature remains below 212°F.
Figure 3.1 in NUREG/CR-5950 can be used to quantify the amount of elemental iodine as a function of the sump water pH and the concentration of iodine in the solution. In some cases, however, licensees have misapplied this figure. Rather than using the total concentration of iodine (i.e., stable and radioactive), licensees based their assessment on only the radioactive iodine in the sump water. By using only the	The calculation methodology for containment sump pH control was based on the approach outlined in NUREG-1465 and NUREG/CR-5950.  Both stable and radioactive iodine were considered.

RIS Issue	Licensee Comments
radioactive iodine, licensees have underestimated how much iodine evolves during postaccident conditions.	
<b>6. Release Pathways</b>	
Changes to the plant configuration associated with an LAR (e.g., an "open" containment during refueling) may require a reanalysis of the design basis dose calculations. A request for TS modifications allowing containment penetrations (i.e., personnel air lock, equipment hatch) to be open during refueling cannot rely on the current dose analysis if this analysis has not already considered these release pathways. Releases from personnel air locks and equipment hatches exposed to the environment and containment purge releases prior to containment isolation need to be addressed.	The AST application re-analyzes the design basis dose calculations for an open containment during refueling and following a fuel handling accident.
Licensees are responsible for identifying all release pathways and for considering these pathways in their AST analyses, consistent with any proposed modification.	Control room, exclusion area boundary, and low population zone atmospheric dispersion factors (X/Q) for all applicable release paths were reviewed and revised for AST as necessary.
<b>7. Primary to Secondary Leakage</b>	
Some analysis parameters can be affected by density changes that occur in the process steam. The NRC staff continues to find errors in LAR submittals concerning the modeling of primary to secondary leakage during a postulated accident. This issue is discussed in Information Notice (IN) 88-31, "Steam Generator Tube Rupture Analysis Deficiency," (Ref. 11) and Item 3.f in RIS 2001-19. An acceptable methodology for modeling this leakage is provided in Appendix F to RG 1.183, Regulatory Position 5.2.	N/A for BWR
<b>8. Elemental Iodine Decontamination Factor (DF)</b>	
Appendix B to RG 1.183, provides assumptions for evaluating the radiological consequences of a fuel handling accident. If the water depth above the damaged fuel is 23 feet or greater, Regulatory Position 2 states that "the decontamination factors for the elemental and organic [iodine] species are 500 and 1,	The depth of water over the damaged fuel is not less than 23 feet for the bounding fuel handling accident in the reactor cavity. Due to the submergence of the damaged fuel, the iodine release is assumed to experience a DF of 200 per RG 1.183.

RIS Issue	Licensee Comments
<p>respectively, giving an overall effective decontamination factor of 200." However, an overall DF of 200 is achieved when the DF for elemental iodine is 285, not 500.</p>	
<b>9. Isotopes Used in Dose Assessments</b>	
<p>For some accidents (e.g., main steamline break and rod drop), licensees have excluded noble gas and cesium isotopes from the dose assessment. The inclusion of these isotopes should be addressed in the dose assessments for AST implementation.</p>	<p>Noble gas isotopes were included in the dose assessment. The contribution due to cesium has been shown to be insignificant in other Exelon submittals such as for Dresden, Quad Cities, Limerick, and Clinton. For this reason, and the fact that cesium is not specifically included in RG 1.183 Appendix D, Section 4.4, cesium is not included in the analysis.</p>
<b>10. Definition of Dose Equivalent 131</b>	
<p>In the conversion to an AST, licensees have proposed a modification to the TS definition of dose equivalent 131. Although different references are available for dose conversion factors, the TS definition should be based on the same dose conversion factors that are used in the determination of the reactor coolant dose equivalent iodine curie content for the main steamline break and steam generator tube rupture accident analyses.</p>	<p>The definition of DEI-131 is modified to reflect that the dose conversion factors are those listed in Federal Guidance Report 11.</p>
<b>11. Acceptance Criteria for Off-Gas or Waste Gas System Release</b>	
<p>As part of full AST implementation, some licensees have included an accident involving a release from their off-gas or waste gas system. Any licensee who chooses to implement AST for an off-gas or waste gas system release should base its acceptance criteria on 100 mrem TEDE. Licensees may also choose not to implement AST for this accident and continue with their existing analysis and acceptance criteria of 500 mrem whole body.</p>	<p>Accident not included with this submittal.</p>
<b>12. Containment Spray Mixing</b>	
<p>Some plants with mechanical means for mixing containment air have assumed that the containment fans intake air solely from a sprayed area and discharge it solely to an unsprayed region or</p>	<p>Containment spray is not credited in this submittal.</p>



<b>RIS Issue</b>	<b>Licensee Comments</b>
vice versa. Without additional analysis, test measurements or further justification, it should be assumed that the intake of air by containment ventilation systems is supplied proportionally to the sprayed and unsprayed volumes in containment.	

# ATTACHMENT A

## PAVAN X/Q (sec/m<sup>3</sup>)

### Off-Gas Stack and Reactor Building Stacks EAB X/Q Values<sup>(1, 2)</sup>

RELEASE LOCATION	X/Q PARAMETER <sup>(3)</sup>	0-0.5 hour	0-2 hour	0-8 hour	8-24 hour	1-4 day	4-30 day	JFD Wind Speed Category Compliance <sup>(4)</sup>
<b>EAB (823 m)</b>								
<b>Off-Gas Stack</b>								
Tower 2 320' winds; Tower 2 316' - 33' stability	Direction-Specific Max	NA	5.50E-06 (N)	1.76E-06 (WSW)	1.06E-06 (WSW)	3.53E-07 (W)	8.86E-08 (W)	RG 1.23, Revision 0
		NA	6.02E-06 (SW)	1.88E-06 (SW)	1.08E-06 (WSW)	3.73E-07 (W)	9.29E-08 (W)	RG 1.23, Revision 1
	Site Limit	NA	8.89E-06	3.14E-06	1.87E-06	6.03E-07	1.19E-07	RG 1.23, Revision 0
		NA	<b>9.17E-06</b>	<b>3.24E-06</b>	<b>1.92E-06</b>	<b>6.22E-07</b>	<b>1.23E-07</b>	RG 1.23, Revision 1
	Max Fumigation	5.30E-05 (S, W, WNW, SSE)	NA	NA	NA	NA	NA	RG 1.23, Revision 0
		5.30E-05 (S, W, WNW, SSE)	NA	NA	NA	NA	NA	RG 1.23, Revision 1
<b>Units 2 and 3 Reactor Building Stacks</b>								
Tower 2 33' winds; Tower 2 150' - 33' stability	Direction-Specific Max	NA	3.46E-04 (ENE)	1.79E-04 (ENE)	1.29E-04 (ENE)	6.33E-05 (ENE)	2.27E-05 (ENE)	RG 1.23, Revision 0
		NA	3.54E-04 (E)	1.85E-04 (E)	1.34E-04 (E)	6.61E-05 (E)	2.40E-05 (E)	RG 1.23, Revision 1
	Site Limit	NA	2.45E-04	1.34E-04	9.95E-05	5.19E-05	2.04E-05	RG 1.23, Revision 0
		NA	2.95E-04	1.59E-04	1.16E-04	5.95E-05	2.27E-05	RG 1.23, Revision 1
<b>Units 2 and 3 Reactor Building Stacks, Reactor Building Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch</b>								
River Tower 45' winds; Tower 1A 89' - 33' stability	Direction-Specific Max	NA	4.25E-04 (E)	2.26E-04 (SE)	1.66E-04 (SE)	8.45E-05 (SE)	3.22E-05 (SE)	RG 1.23, Revision 0
		NA	<b>4.51E-04 (SE)</b>	<b>2.42E-04 (SE)</b>	<b>1.77E-04 (SE)</b>	<b>8.97E-05 (SE)</b>	<b>3.39E-05 (SE)</b>	RG 1.23, Revision 1
	Site Limit	NA	4.05E-04	2.19E-04	1.61E-04	8.28E-05	3.18E-05	RG 1.23, Revision 0
		NA	4.08E-04	2.22E-04	1.64E-04	8.47E-05	3.28E-05	RG 1.23, Revision 1

<sup>1</sup> Blue highlighting indicates X/Q values obtained from Calculation PM-1055, Revision 0.

<sup>2</sup> Non-blue highlighting indicates X/Q values additionally generated for purpose of providing AADB RAI 13 responses.

<sup>3</sup> The highest of the Direction-Specific and the Site Limit values are indicated in bold.

<sup>4</sup> RG 1.23, Revision 0 and RG 1.23, Revision 1 (March 2007) wind speed categories are shown in Attachment A, Sheet 3 of 6.

**ATTACHMENT A**  
**PAVAN X/Q (sec/m<sup>3</sup>)**

**Off-Gas Stack and Reactor Building Stacks LPZ X/Q Values<sup>(1, 2)</sup>**

RELEASE LOCATION	X/Q PARAMETER <sup>(3)</sup>	0-0.5 hour	0-2 hour	0-8 hour	8-24 hour	1-4 day	4-30 day	JFD Wind Speed Category Compliance <sup>(4)</sup>
<b>LPZ (7300 m)</b>								
<b>Off-Gas Stack</b>								
Tower 2 320' winds; Tower 2 316' - 33' stability	Direction-Specific Max	NA	5.29E-06 (N)	2.56E-06 (N)	1.78E-06 (N)	8.08E-07 (N)	2.60E-07 (N)	RG 1.23, Revision 0
		NA	5.67E-06 (N)	2.71E-06 (N)	1.88E-06 (N)	8.44E-07 (N)	2.67E-07 (N)	RG 1.23, Revision 1
	Site Limit	NA	8.87E-06	3.94E-06	2.62E-06	1.09E-06	3.06E-07	RG 1.23, Revision 0
		NA	<b>9.05E-06</b>	<b>4.01E-06</b>	<b>2.67E-06</b>	<b>1.10E-06</b>	<b>3.10E-07</b>	RG 1.23, Revision 1
	Max Fumigation	1.75E-05 (SW, WSW, NW, N)	NA	NA	NA	NA	NA	RG 1.23, Revision 0
		1.75E-05 (SW, WSW, NW, N)	NA	NA	NA	NA	NA	RG 1.23, Revision 1
<b>Units 2 and 3 Reactor Building Stacks, Reactor Building Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch</b>								
Tower 2 33' winds; Tower 2 150' - 33' stability	Direction-Specific Max	NA	4.81E-05 (ENE)	2.08E-05 (ENE)	1.37E-05 (ENE)	5.49E-06 (ENE)	1.49E-06 (ENE)	RG 1.23, Revision 0
		NA	<b>4.82E-05 (E)</b>	<b>2.10E-05 (E)</b>	<b>1.39E-05 (E)</b>	<b>5.66E-06 (E)</b>	<b>1.55E-06 (E)</b>	RG 1.23, Revision 1
	Site Limit	NA	3.07E-05	1.43E-05	9.74E-06	4.25E-06	1.29E-06	RG 1.23, Revision 0
		NA	3.65E-05	1.67E-05	1.13E-05	4.82E-06	1.42E-06	RG 1.23, Revision 1

<sup>1</sup> Blue highlighting indicates X/Q values obtained from calculation PM-1055, Revision 0.

<sup>2</sup> Non-blue highlighting indicates X/Q values additionally generated for purpose of providing AADB RAI 13 responses.

<sup>3</sup> The highest of the Direction-Specific and the Site Limit values are indicated in bold.

<sup>4</sup> RG 1.23, Revision 0 and RG 1.23, Revision 1 (March 2007) wind speed categories are shown in Attachment A, Sheet 3 of 6.

# ATTACHMENT A

## PAVAN X/O Wind Speed Categories

Wind Speed Categories <sup>a</sup> (Regulatory Guide 1.23, Revision 0)	
Category	Wind Speed (mph)
1 (Calm) <sup>b</sup>	<0.5
2	>=0.5 to <3.5
3	>=3.5 to <7.5
4	>=7.5 to <12.5
5	>=12.5 to <18.5
6	>=18.5 to <24
7	>=24

Wind Speed Categories <sup>a</sup> (Regulatory Guide 1.23, Revision 1)	
Category	Wind Speed (mph)
1 (Calm) <sup>b</sup>	<0.5
2	>=0.5 to <2.35
3	>=2.35 to <3.47
4	>=3.47 to <4.59
5	>=4.59 to <6.82
6	>=6.82 to <9.06
7	>=9.06 to <11.30
8	>=11.30 to <13.53
9	>=13.53 to <18.01
10	>=18.01 to <22.37
11	>=22.37

<sup>a</sup> To be inclusive of all monitored wind speeds, a midpoint was assumed between each designated wind speed category.

<sup>b</sup> The higher of the starting speeds of the Climatronics® wind vane and anemometer equipment (i.e. 0.50 mph) was used as the threshold for calm winds, per Regulatory Guide 1.145, Section 1.1.

# ATTACHMENT A

## PAVAN Results for Off-Gas Stack to Control Room Intake X/Q Calculations<sup>(1, 2)</sup>

Averaging Period	JFD Wind Speed Category Compliance	Modeled Horizontal Distance (m) from Stack to Control Room Intake											
		209 (Actual Distance)	280	300	500 <sup>(3)</sup>	750	1000	1500	2000	3000	4000	5000	6000
		$X/Q \text{ (sec/m}^3\text{)}^{(6)}$											
0-2 hr <sup>(4, 5)</sup>	RG 1.23, Revision 0	2.72E-06	2.72E-06	2.72E-06	2.72E-06	2.31E-06	2.06E-06	1.95E-06	1.83E-06	1.77E-06	1.71E-06	1.70E-06	1.60E-06
	RG 1.23, Revision 1	<b>3.31E-06</b>	<b>3.31E-06</b>	<b>3.31E-06</b>	<u>3.31E-06</u>	2.60E-06	2.32E-06	2.18E-06	2.05E-06	1.95E-06	1.87E-06	1.86E-06	1.75E-06
1-4 day <sup>(4, 5)</sup>	RG 1.23, Revision 0	2.03E-08	1.50E-07	1.94E-07	3.50E-07	2.80E-07	2.34E-07	2.07E-07	2.15E-07	2.50E-07	2.59E-07	2.58E-07	2.47E-07
	RG 1.23, Revision 1	2.28E-08	1.68E-07	2.18E-07	<u>3.93E-07</u>	3.02E-07	2.55E-07	2.26E-07	2.34E-07	2.65E-07	2.74E-07	2.72E-07	2.62E-07
4-30 day <sup>(4, 5)</sup>	RG 1.23, Revision 0	1.06E-09	2.60E-08	3.95E-08	1.01E-07	7.83E-08	6.31E-08	5.35E-08	6.38E-08	8.36E-08	8.93E-08	8.86E-08	8.43E-08
	RG 1.23, Revision 1	1.14E-09	2.79E-08	4.23E-08	<u>1.09E-07</u>	8.26E-08	6.75E-08	5.77E-08	6.61E-08	8.60E-08	9.17E-08	9.07E-08	8.67E-08

<sup>1</sup> Blue highlighting indicates X/Q values obtained from calculation PM-1055, Revision 0.

<sup>2</sup> Non-blue highlighting indicates X/Q values additionally generated for purpose of providing AADB RAI 13 responses.

<sup>3</sup> Maximum hourly X/Q (which is assigned to represent the 0-2 hour period) is actually predicted to occur at 500 m; however, in accordance with PAVAN model methodology for elevated releases, this maximum value is conservatively also assigned to any lesser desired boundary distance.

<sup>4</sup> Averaging period maxima are indicated in bold.

<sup>5</sup> Underlined values are incorporated into ARCON96 determination of Control Room Intake per NRC RG 1.194, Section 3.2.2.

<sup>6</sup> The maximum of the Direction-Specific Max and Site Limit values is listed.

# ATTACHMENT A

## Off-Gas Stack to Control Room Intake X/Q Summary (Calculated in accordance with RG 1.194, Section 3.2.2)

Model	Horizontal Distance (m)	Release Height (m) <sup>(1)</sup>	X/Q Values (sec/m <sup>3</sup> )				
			0-2 hr	2-8 hr	8-24 hrs	1-4 days	4-30 days
ARCON96 <sup>(2)</sup>	209	112	1.00E-15	1.00E-15	1.00E-15	7.25E-15	5.92E-15
PAVAN <sup>(3, 4)</sup>	209 (actual distance)	72.1	3.31E-06	NA <sup>(5)</sup>	NA	2.28E-08	1.14E-09
PAVAN <sup>(3, 4)</sup>	280	72.1	3.31E-06	NA	NA	1.68E-07	2.79E-08
PAVAN <sup>(3, 4)</sup>	300	72.1	3.31E-06	NA	NA	2.18E-07	4.23E-08
PAVAN <sup>(3, 4)</sup>	500	72.1	3.31E-06	NA	NA	3.93E-07	1.09E-07
PAVAN <sup>(3, 4)</sup>	750	72.1	2.60E-06	NA	NA	3.02E-07	8.26E-08
PAVAN <sup>(3, 4)</sup>	1000	72.1	2.32E-06	NA	NA	2.55E-07	6.75E-08
PAVAN <sup>(3, 4)</sup>	1500	72.1	2.18E-06	NA	NA	2.26E-07	5.77E-08
PAVAN <sup>(3, 4)</sup>	2000	72.1	2.05E-06	NA	NA	2.34E-07	6.61E-08
PAVAN <sup>(3, 4)</sup>	3000	72.1	1.95E-06	NA	NA	2.65E-07	8.60E-08
PAVAN <sup>(3, 4)</sup>	4000	72.1	1.87E-06	NA	NA	2.74E-07	9.17E-08
PAVAN <sup>(3, 4)</sup>	5000	72.1	1.86E-06	NA	NA	2.72E-07	9.07E-08
PAVAN <sup>(3, 4)</sup>	6000	72.1	1.75E-06	NA	NA	2.62E-07	8.67E-08
<b>X/Q values calculated according to RG 1.194, Section 3.2.2</b>			<b>3.31E-06</b>	<b>1.00E-15</b>	<b>1.00E-15</b>	<b>1.64E-08</b>	<b>4.54E-09</b>

<sup>1</sup> The release height for PAVAN model runs is measured from the Control Room Intake elevation instead of plant grade per RG 1.194, Section 3.2.2.

<sup>2</sup> ARCON96 X/Q values, taken from Table 2-2 in Calculation PM-1055, Revision 0.

<sup>3</sup> The higher of the max sector X/Q and site limit value is selected.

<sup>4</sup> The higher of the RG 1.23, Revision 0 and RG 1.23, Revision 1 X/Q values was selected.

<sup>5</sup> Not applicable

# ATTACHMENT A

## X/Q (sec/m<sup>3</sup>) Results Summary

(Incorporating revisions to Table 4-1 from PM-1055, per AADB RAI 13)

RECEPTOR	RELEASE POINT	0 – 0.5 hour	0-2 hour	2-8 hour	8-24 hour	1-4 day	4-30 day
Control Room Intake	Off-Gas Stack		3.31E-06	1.00E-15	1.00E-15	1.64E-08	4.54E-09
	Unit 2 Reactor Building Stacks		1.18E-03	9.08E-04	4.14E-04	2.90E-04	2.26E-04
	Unit 3 Reactor Building Stacks		1.18E-03	8.91E-04	4.00E-04	2.51E-04	1.98E-04
EAB (823 m)	Off-Gas Stack	5.30E-05	9.17E-06	3.24E-06*	1.92E-06	6.22E-07	1.23E-07
	Units 2 and 3 Reactor Building Stacks, RB Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch		4.51E-04 (SE)	2.42E-04* (SE)	1.77E-04 (SE)	8.97E-05 (SE)	3.39E-05 (SE)
LPZ (7,300 m)	Off-Gas Stack	1.75E-05	9.05E-06	4.01E-06*	2.67E-06	1.10E-06	3.10E-07
	Units 2 and 3 Reactor Building Stacks, RB Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch		4.82E-05 (E)	2.10E-05* (E)	1.39E-05 (E)	5.66E-06 (E)	1.55E-06 (E)

\*PAVAN result representing 0-8 hour time period.

# ATTACHMENT B

**Peach Bottom**  
**Joint Frequency Distribution**  
 1984-1988  
 Tower 2  
 320' wind  
 316'-33' Delta T

Wind Speed Category <sup>(1)</sup>	Wind Direction Category																Total	
	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW		Calms
1(Calm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0
4	0	2	10	10	15	3	0	0	0	0	0	0	0	0	0	0	0	0
5	5	6	10	23	59	25	2	0	0	1	2	0	0	0	0	0	1	0
6	1	3	11	18	43	40	10	4	2	2	2	0	1	3	0	0	0	0
7	0	6	10	11	13	17	9	0	7	4	3	3	2	3	0	0	5	0
8	0	1	2	13	8	3	9	0	4	3	0	6	13	7	3	4	0	0
9	2	4	9	11	2	3	7	0	6	2	2	1	14	5	2	14	0	0
10	1	2	0	1	0	1	0	0	0	0	0	2	10	2	0	1	0	0
11	1	0	0	0	0	1	0	0	0	0	0	1	6	5	1	1	0	0
<b>Subtotal</b>	<b>10</b>	<b>24</b>	<b>52</b>	<b>87</b>	<b>143</b>	<b>93</b>	<b>37</b>	<b>4</b>	<b>19</b>	<b>12</b>	<b>9</b>	<b>13</b>	<b>46</b>	<b>25</b>	<b>6</b>	<b>26</b>	<b>0</b>	<b>606</b>
1(Calm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	0	1	1	9	5	0	2	0	0	0	0	0	0	0	0	0	0	0
4	1	7	5	8	21	5	1	0	0	0	0	1	0	1	0	1	0	0
5	12	15	9	11	34	19	6	1	1	4	3	1	3	1	2	3	0	0
6	1	11	11	18	6	21	11	4	4	4	4	2	3	5	1	7	0	0
7	2	5	4	2	5	9	13	5	17	9	6	5	13	2	1	12	0	0
8	3	0	3	1	3	0	9	6	14	5	6	7	10	8	3	15	0	0
9	8	2	1	1	0	2	5	3	22	5	3	13	21	15	6	20	0	0
10	1	3	0	0	0	1	1	1	6	1	1	2	11	12	5	6	0	0
11	0	0	1	0	0	0	0	0	1	1	0	1	7	10	0	0	0	0
<b>Subtotal</b>	<b>28</b>	<b>45</b>	<b>36</b>	<b>50</b>	<b>74</b>	<b>57</b>	<b>48</b>	<b>20</b>	<b>65</b>	<b>29</b>	<b>23</b>	<b>31</b>	<b>69</b>	<b>53</b>	<b>19</b>	<b>63</b>	<b>0</b>	<b>710</b>
1(Calm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	2	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	0	3	10	14	1	0	0	0	0	0	0	0	0	0	0	0	0	0
4	4	7	11	16	31	17	2	0	1	0	0	0	0	0	0	0	1	0
5	18	14	15	17	17	40	6	4	11	4	7	3	2	2	3	16	0	0
6	26	12	8	11	10	21	26	13	20	13	9	4	16	6	8	35	0	0
7	21	6	3	8	5	11	31	10	40	14	15	14	23	13	9	45	0	0
8	8	8	0	3	2	3	15	12	37	17	11	15	11	21	18	43	0	0
9	14	2	4	2	2	3	7	5	48	18	16	24	48	45	26	74	0	0
10	4	1	0	0	1	2	0	1	10	0	3	3	29	27	22	14	0	0
11	1	3	0	0	0	2	0	0	2	0	2	16	33	12	4	0	0	0
<b>Subtotal</b>	<b>98</b>	<b>58</b>	<b>63</b>	<b>72</b>	<b>69</b>	<b>97</b>	<b>87</b>	<b>45</b>	<b>168</b>	<b>66</b>	<b>63</b>	<b>65</b>	<b>145</b>	<b>147</b>	<b>98</b>	<b>232</b>	<b>0</b>	<b>1561</b>
1(Calm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	18	18	28	26	28	20	14	13	12	6	9	6	8	19	8	10	0	0
3	41	40	80	93	87	66	31	22	29	17	23	9	18	19	28	40	0	0
4	67	53	78	99	130	77	54	50	39	31	28	24	30	19	40	50	0	0
5	209	119	120	174	227	179	192	134	171	110	98	90	89	59	118	231	0	0
6	216	175	125	187	215	168	282	234	320	203	128	80	109	115	186	390	0	0
7	237	151	118	123	134	129	212	204	330	193	142	89	134	160	235	438	0	0
8	233	99	80	54	103	102	129	147	274	132	80	103	142	196	332	406	0	0
9	278	113	52	44	87	94	107	58	345	108	91	139	311	543	821	694	0	0
10	69	28	13	11	24	24	15	10	96	21	15	20	211	392	489	230	0	0
11	25	10	10	2	18	7	8	1	40	6	5	12	124	227	256	94	0	0
<b>Subtotal</b>	<b>1393</b>	<b>806</b>	<b>704</b>	<b>813</b>	<b>1053</b>	<b>866</b>	<b>1044</b>	<b>873</b>	<b>1656</b>	<b>827</b>	<b>619</b>	<b>572</b>	<b>1176</b>	<b>1749</b>	<b>2513</b>	<b>2583</b>	<b>2</b>	<b>19249</b>
1(Calm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	21	15	15	20	24	17	26	16	26	16	17	19	30	17	23	11	0	0
3	39	29	21	41	38	43	35	43	44	40	42	35	24	19	16	23	0	0
4	50	43	35	51	65	48	60	69	60	65	63	36	42	23	30	36	0	0
5	137	92	91	138	168	113	188	176	263	196	164	111	102	82	112	115	0	0
6	177	131	95	87	123	134	205	234	432	273	191	116	120	116	154	200	0	0
7	180	79	69	40	68	116	152	195	423	257	155	149	193	161	255	213	0	0
8	102	30	25	9	37	61	88	142	284	182	99	157	213	232	277	276	0	0
9	110	26	17	6	39	46	69	103	367	150	159	177	417	441	493	336	0	0
10	24	10	3	4	11	20	16	11	72	19	27	38	88	124	101	48	0	0
11	8	1	6	1	21	3	9	2	9	2	2	2	10	12	10	14	0	0
<b>Subtotal</b>	<b>848</b>	<b>456</b>	<b>377</b>	<b>397</b>	<b>562</b>	<b>601</b>	<b>876</b>	<b>990</b>	<b>1980</b>	<b>1200</b>	<b>929</b>	<b>840</b>	<b>1239</b>	<b>1227</b>	<b>1471</b>	<b>1272</b>	<b>6</b>	<b>15391</b>
1(Calm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	16	7	13	10	11	12	10	12	12	15	15	14	13	13	7	0	0	0
3	10	12	9	16	20	11	18	20	11	20	17	18	16	15	13	15	0	0
4	26	13	14	10	13	18	27	34	33	29	27	36	22	18	18	20	0	0
5	53	19	18	17	15	28	43	44	75	89	64	43	39	60	59	0	0	0
6	62	19	7	10	14	18	37	32	89	72	105	77	88	49	69	53	0	0
7	29	9	6	0	5	11	18	46	46	46	66	85	85	74	87	57	0	0
8	12	4	3	0	0	2	7	15	40	19	31	57	85	55	67	47	0	0
9	2	0	0	0	0	1	4	6	24	20	23	80	128	104	61	19	0	0
10	0	0	0	0	0	0	0	0	1	3	1	21	23	23	0	5	0	0
11	1	0	0	0	0	4	0	0	0	0	0	1	1	0	0	0	0	0
<b>Subtotal</b>	<b>211</b>	<b>83</b>	<b>70</b>	<b>63</b>	<b>82</b>	<b>101</b>	<b>164</b>	<b>209</b>	<b>331</b>	<b>310</b>	<b>384</b>	<b>494</b>	<b>505</b>	<b>390</b>	<b>388</b>	<b>282</b>	<b>5</b>	<b>4032</b>



### ATTACHMENT B

7 (G)	1 (Calm)																					0
	2	7	9	6	6	8	2	1	7	8	8	1	10	8	8	7	10					106
	3	4	5	5	4	5	3	3	2	9	1	5	8	5	6	6	9					80
	4	4	9	5	4	5	1	11	4	8	9	6	8	7	8	11	12					112
	5	35	8	15	13	7	5	12	5	22	19	22	19	25	22	44	34					307
	6	17	3	5	4	3	1	8	3	6	16	36	25	28	26	53	62					296
	7	7	4	1	0	0	1	4	3	8	4	16	40	27	20	41	29					205
	8	0	0	0	0	0	0	2	1	1	5	10	23	37	10	17	8					114
	9	1	0	0	0	0	0	0	1	1	0	5	14	24	32	5	4					87
	10	0	0	0	0	0	0	0	0	0	0	2	1	2	0	0	0					5
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					0
	<b>Subtotal</b>		<b>75</b>	<b>38</b>	<b>37</b>	<b>31</b>	<b>28</b>	<b>13</b>	<b>41</b>	<b>26</b>	<b>63</b>	<b>62</b>	<b>101</b>	<b>149</b>	<b>162</b>	<b>134</b>	<b>184</b>	<b>168</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1312</b>
<b>Total</b>		<b>2661</b>	<b>1510</b>	<b>1329</b>	<b>1513</b>	<b>2041</b>	<b>1828</b>	<b>2297</b>	<b>2167</b>	<b>4282</b>	<b>2506</b>	<b>2128</b>	<b>2124</b>	<b>3342</b>	<b>3725</b>	<b>4679</b>	<b>4626</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>42771</b>	

**Notes:**

1) Wind Speed Categories defined as follows

Category	Wind Speed (mph)
1 (Calm)	<0.5
2	>=0.5 to <2.35
3	>=2.35 to <3.47
4	>=3.47 to <4.59
5	>=4.59 to <6.82
6	>=6.82 to <9.06
7	>=9.06 to <11.3
8	>=11.3 to <13.53
9	>=13.53 to <18.01
10	>=18.01 to <22.37
11	>=22.37



**ATTACHMENT B**

7 (G)	1 (Calm)																			0.000000	0.060060
	2	0.016366	0.021042	0.014028	0.014028	0.018704	0.004676	0.002338	0.016366	0.018704	0.018704	0.002338	0.023380	0.018704	0.018704	0.016366	0.023380				0.247831
	3	0.009352	0.011690	0.011690	0.009352	0.011690	0.007014	0.007014	0.004676	0.021042	0.002338	0.011690	0.018704	0.011690	0.014028	0.014028	0.021042				0.187043
	4	0.009352	0.021042	0.011690	0.009352	0.011690	0.002338	0.025718	0.009352	0.018704	0.021042	0.014028	0.018704	0.016366	0.018704	0.025718	0.028056				0.261860
	5	0.081831	0.018704	0.035070	0.030394	0.016366	0.011690	0.028056	0.011690	0.051437	0.044423	0.051437	0.044423	0.058451	0.051437	0.102873	0.079493				0.717776
	6	0.039747	0.007014	0.011690	0.009352	0.007014	0.002338	0.018704	0.007014	0.014028	0.037409	0.084169	0.058451	0.065465	0.060789	0.123916	0.144958				0.692058
	7	0.016366	0.009352	0.002338	0.000000	0.000000	0.002338	0.009352	0.007014	0.018704	0.009352	0.037409	0.093521	0.063127	0.046761	0.095859	0.067803				0.479297
	8	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.004676	0.002338	0.002338	0.011690	0.023380	0.053775	0.086507	0.023380	0.039747	0.018704				0.266536
	9	0.002338	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.011690	0.032732	0.056113	0.074817	0.011690	0.009352					0.203409
	10	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.004676	0.002338	0.004676	0.000000	0.000000				0.011690
	11	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000				0.000000
	<b>Subtotal</b>	<b>0.176352</b>	<b>0.088845</b>	<b>0.086507</b>	<b>0.072479</b>	<b>0.065465</b>	<b>0.030394</b>	<b>0.095859</b>	<b>0.060789</b>	<b>0.147296</b>	<b>0.144958</b>	<b>0.236141</b>	<b>0.348367</b>	<b>0.378761</b>	<b>0.313296</b>	<b>0.430198</b>	<b>0.392790</b>				<b>0.000000</b>
<b>Total</b>	<b>6.22</b>	<b>3.53</b>	<b>3.11</b>	<b>3.54</b>	<b>4.77</b>	<b>4.27</b>	<b>5.37</b>	<b>5.07</b>	<b>10.01</b>	<b>5.58</b>	<b>4.98</b>	<b>4.97</b>	<b>7.81</b>	<b>8.71</b>	<b>10.94</b>	<b>10.82</b>				<b>0.03</b>	<b>100.00</b>

Notes:

1) Wind Speed Categories defined as follows

Category	Wind Speed (mph)
1 (Calm)	<0.5
2	>=0.5 to <2.35
3	>=2.35 to <3.47
4	>=3.47 to <4.59
5	>=4.59 to <6.82
6	>=6.82 to <9.06
7	>=9.06 to <11.3
8	>=11.3 to <13.53
9	>=13.53 to <18.01
10	>=18.01 to <22.37
11	>=22.37

ATTACHMENT B

Peach Bottom  
 Joint Frequency Distribution  
 1984-1988  
 Tower 2  
 33' wind  
 150°-33' Delta T

		Wind Direction Category																		
Wind Speed Category <sup>(1)</sup>		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Calms	Total	
1 (A)	1(Calm)																		0	0
	2	37	63	66	49	22	20	12	12	4	0	0	4	5	10	19	17		340	
	3	51	71	76	94	83	59	38	21	4	3	4	3	11	6	7	26		557	
	4	67	41	27	27	37	56	43	26	12	6	14	8	25	24	17	46		476	
	5	95	35	4	1	7	35	62	48	42	28	29	23	57	65	51	125		707	
	6	26	7	1	0	0	14	9	20	59	22	33	26	45	34	18	88		402	
	7	12	0	0	0	0	1	2	13	46	14	16	9	21	12	12	32		190	
	8	2	0	0	0	0	0	0	4	16	4	2	1	4	8	6	6		53	
	9	0	0	0	0	0	0	0	4	8	1	2	1	3	5	1	2		27	
	10	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0		1	
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
Subtotal		290	217	174	171	149	185	166	148	192	78	100	75	171	164	131	342	0	2753	
2 (B)	1(Calm)																		0	0
	2	25	32	31	18	16	8	10	3	5	1	2	1	7	3	6	15		183	
	3	35	24	33	49	45	36	13	10	7	1	4	5	8	9	3	23		305	
	4	37	27	8	13	8	19	18	14	14	12	13	4	16	15	11	35		264	
	5	97	13	3	2	4	10	34	47	59	25	42	31	40	45	42	98		592	
	6	42	2	0	0	1	3	12	25	85	25	24	17	24	37	51	117		465	
	7	7	0	0	0	0	1	1	17	66	24	12	14	30	40	43	71		326	
	8	4	0	0	0	0	4	0	8	27	7	2	0	7	12	19	18		108	
	9	1	0	0	0	0	0	0	3	10	0	2	0	0	10	13	4		43	
	10	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0		1	
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
Subtotal		248	98	75	62	174	81	68	127	273	95	101	72	132	172	188	381	0	2287	
3 (C)	1(Calm)																		0	0
	2	18	24	10	16	10	7	7	1	3	0	2	2	3	4	4	11		122	
	3	14	23	17	32	25	20	4	4	3	0	3	2	3	3	5	22		180	
	4	23	6	1	7	7	8	14	14	13	4	3	7	14	9	11	22		163	
	5	33	4	2	1	2	2	16	34	48	17	14	10	19	25	25	75		327	
	6	11	0	0	0	0	1	8	13	40	19	17	13	25	22	40	95		304	
	7	6	1	0	0	0	0	0	8	33	15	13	13	18	30	44	48		229	
	8	3	0	0	0	1	0	0	3	10	1	0	0	6	12	11	19		66	
	9	1	0	0	0	0	1	0	2	6	0	0	0	0	8	15	8		41	
	10	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0		1	
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
Subtotal		109	58	30	58	45	39	49	80	156	56	52	47	88	113	155	300	0	1433	
4 (D)	1(Calm)																		10	10
	2	179	185	272	182	128	91	79	101	65	41	40	49	67	69	99	117		1764	
	3	216	158	169	138	170	86	78	132	116	51	39	57	56	62	93	125		1746	
	4	166	98	51	21	35	75	115	185	130	62	45	53	79	84	145	198		1562	
	5	314	59	15	14	28	66	242	328	323	146	111	103	164	266	446	568		3195	
	6	191	10	0	0	4	9	78	175	256	81	84	54	133	325	538	556		2494	
	7	85	2	0	0	4	23	44	138	42	25	34	110	273	421	324	324		1525	
	8	25	0	0	0	0	5	15	40	14	4	7	49	96	217	135	270		507	
	9	17	0	0	0	0	2	8	28	4	2	2	21	28	88	70	7		270	
	10	0	0	0	0	0	0	0	1	3	0	0	0	1	2	7	14		14	
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	1	3	4		4	
Subtotal		11213	512	507	355	365	331	622	988	1097	446	350	359	678	1204	2050	2103	10	13191	
5 (E)	1(Calm)																		54	54
	2	296	270	315	300	374	310	315	294	286	192	167	234	248	287	332	260		4460	
	3	231	152	102	86	147	182	236	309	353	185	162	163	202	235	279	171		3175	
	4	201	54	51	35	77	103	164	285	310	172	128	154	235	315	276	235		2793	
	5	216	35	26	34	26	63	211	355	388	210	181	250	381	601	558	432		3967	
	6	84	5	1	5	9	23	54	83	196	49	46	65	139	228	274	228		1489	
	7	21	2	0	0	0	5	20	18	63	15	16	15	41	55	88	71		430	
	8	7	0	0	0	0	0	2	10	28	5	3	3	8	10	20	16		112	
	9	2	0	0	0	0	0	3	16	1	0	0	0	2	5	3	6		38	
	10	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	1		3	
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
Subtotal		1058	518	495	460	633	666	1002	1357	1641	829	701	884	1287	1716	1830	1426	54	16521	
6 (F)	1(Calm)																		26	26
	2	115	72	69	85	151	161	97	71	90	128	169	228	294	257	215	114		2316	
	3	22	9	7	7	30	64	32	29	31	70	126	225	208	160	116	50		1166	
	4	6	0	1	1	2	12	20	10	24	29	49	116	135	89	66	26		586	
	5	1	0	4	1	1	2	4	8	24	17	46	127	79	47	23	10		394	
	6	0	0	0	0	0	0	0	2	0	0	3	12	3	2	2	4		28	
	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		1	
	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	
Subtotal		144	81	81	94	184	239	153	118	171	244	393	708	719	555	423	204	26	4537	



# ATTACHMENT B

**Peach Bottom**  
**Joint Frequency Distribution**  
 1984-1988  
 Tower 2  
 33' wind  
 150°-33' Delta T

Wind Speed Category <sup>(1)</sup>	Wind Direction Category																Calm	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16		
1 (A) 1 (Calm)																	0.000000	0.000000
2	0.085871	0.148212	0.153175	0.113721	0.051058	0.046417	0.027850	0.027850	0.009283	0.000000	0.000000	0.009283	0.011604	0.023208	0.044096	0.039454	0.000000	0.789083
3	0.118362	0.164779	0.176383	0.218158	0.192629	0.136929	0.088192	0.048737	0.009283	0.006962	0.009283	0.006962	0.025629	0.013925	0.016246	0.060342	0.000000	1.292703
4	0.155496	0.095154	0.062662	0.062662	0.085871	0.129967	0.099796	0.060342	0.027850	0.013925	0.032492	0.018567	0.058621	0.055700	0.039454	0.106758	0.000000	1.104716
5	0.220479	0.081229	0.009283	0.002321	0.016246	0.081229	0.143892	0.111400	0.094745	0.064983	0.067304	0.053379	0.132287	0.150854	0.118362	0.290104	0.000000	1.840828
6	0.060342	0.016246	0.002321	0.000000	0.000000	0.032492	0.020887	0.046417	0.136929	0.051058	0.075587	0.060342	0.104437	0.078908	0.041775	0.204233	0.000000	0.932974
7	0.027850	0.000000	0.000000	0.000000	0.000000	0.002321	0.004642	0.030171	0.106758	0.032492	0.037133	0.020887	0.048737	0.027850	0.027850	0.074267	0.000000	0.440056
8	0.004642	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.009283	0.037133	0.009283	0.004642	0.002321	0.009283	0.018567	0.013925	0.013925	0.000000	0.123004
9	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.009283	0.018567	0.002321	0.004642	0.002321	0.009692	0.011604	0.002321	0.004642	0.000000	0.062662
10	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321
11	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
<b>Subtotal</b>	<b>0.673041</b>	<b>0.503620</b>	<b>0.403825</b>	<b>0.396862</b>	<b>0.345804</b>	<b>0.429354</b>	<b>0.385258</b>	<b>0.343483</b>	<b>0.445600</b>	<b>0.181025</b>	<b>0.237083</b>	<b>0.174062</b>	<b>0.396862</b>	<b>0.350616</b>	<b>0.304029</b>	<b>0.000000</b>	<b>0.000000</b>	<b>6.389250</b>
2 (B) 1 (Calm)																	0.000000	0.000000
2	0.058021	0.074267	0.071946	0.041775	0.037133	0.018567	0.023208	0.006962	0.011604	0.002321	0.004642	0.002321	0.016246	0.006962	0.013925	0.034812	0.000000	0.424712
3	0.081229	0.055700	0.076587	0.113721	0.104437	0.083550	0.030171	0.023208	0.016246	0.002321	0.009283	0.011604	0.018567	0.020887	0.006962	0.053379	0.000000	0.707854
4	0.085871	0.062662	0.018567	0.030171	0.018567	0.044096	0.041775	0.032492	0.032492	0.027850	0.030171	0.009283	0.037133	0.034812	0.025529	0.081229	0.000000	0.612700
5	0.225121	0.030171	0.006962	0.004642	0.009283	0.023208	0.078908	0.109079	0.136929	0.058021	0.097475	0.071946	0.092833	0.104437	0.097475	0.227442	0.000000	1.379382
6	0.097475	0.004642	0.000000	0.000000	0.002321	0.006962	0.027850	0.058021	0.197271	0.058021	0.055700	0.039454	0.055700	0.085871	0.118362	0.271537	0.000000	1.079187
7	0.016246	0.000000	0.000000	0.000000	0.000000	0.002321	0.002321	0.039454	0.153175	0.055700	0.027850	0.032492	0.069625	0.092833	0.099796	0.164779	0.000000	0.756591
8	0.009283	0.000000	0.000000	0.000000	0.000000	0.009283	0.000000	0.018567	0.062662	0.016246	0.004642	0.000000	0.016246	0.027850	0.044096	0.041775	0.000000	0.250650
9	0.002321	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.006962	0.023208	0.000000	0.004642	0.000000	0.000000	0.023208	0.030171	0.009283	0.000000	0.069796
10	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321	0.000000	0.000000	0.000000	0.002321
11	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
<b>Subtotal</b>	<b>0.575566</b>	<b>0.227442</b>	<b>0.174062</b>	<b>0.190308</b>	<b>0.171742</b>	<b>0.178797</b>	<b>0.204233</b>	<b>0.234748</b>	<b>0.633587</b>	<b>0.220479</b>	<b>0.234404</b>	<b>0.167100</b>	<b>0.306350</b>	<b>0.399183</b>	<b>0.436316</b>	<b>0.884237</b>	<b>0.000000</b>	<b>5.307742</b>
3 (C) 1 (Calm)																	0.000000	0.000000
2	0.041775	0.055700	0.023208	0.037133	0.023208	0.016246	0.016246	0.002321	0.006962	0.000000	0.004642	0.004642	0.006962	0.009283	0.009283	0.025529	0.000000	0.283141
3	0.032492	0.053379	0.039454	0.074267	0.058021	0.046417	0.009283	0.009283	0.009283	0.000000	0.006962	0.004642	0.006962	0.011604	0.006962	0.051058	0.000000	0.417750
4	0.053379	0.013925	0.002321	0.016246	0.018567	0.016246	0.032492	0.032492	0.030171	0.009283	0.006962	0.016246	0.032492	0.020887	0.025529	0.051058	0.000000	0.378296
5	0.076587	0.009283	0.004642	0.002321	0.004642	0.004642	0.037133	0.078908	0.111400	0.039454	0.032492	0.023208	0.044096	0.058021	0.058021	0.174062	0.000000	0.758912
6	0.025529	0.000000	0.000000	0.000000	0.000000	0.002321	0.018567	0.030171	0.092833	0.044096	0.039454	0.058021	0.058021	0.051058	0.092833	0.220479	0.000000	0.575533
7	0.013925	0.002321	0.000000	0.000000	0.000000	0.000000	0.000000	0.018567	0.075587	0.034812	0.030171	0.030171	0.041775	0.069625	0.102117	0.111400	0.000000	0.531470
8	0.006962	0.000000	0.000000	0.000000	0.002321	0.000000	0.000000	0.006962	0.023208	0.002321	0.000000	0.000000	0.013925	0.027850	0.025529	0.044096	0.000000	0.153175
9	0.002321	0.000000	0.000000	0.000000	0.000000	0.002321	0.000000	0.004642	0.013925	0.000000	0.000000	0.000000	0.000000	0.018567	0.034812	0.018567	0.000000	0.095154
10	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321
11	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
<b>Subtotal</b>	<b>0.252971</b>	<b>0.134608</b>	<b>0.069625</b>	<b>0.129967</b>	<b>0.104437</b>	<b>0.090512</b>	<b>0.113721</b>	<b>0.185867</b>	<b>0.320550</b>	<b>0.129967</b>	<b>0.129967</b>	<b>0.109079</b>	<b>0.204233</b>	<b>0.262254</b>	<b>0.359729</b>	<b>0.698250</b>	<b>0.000000</b>	<b>3.325752</b>
4 (D) 1 (Calm)																	0.023208	0.023208
2	0.415429	0.429354	0.631266	0.422391	0.297066	0.211196	0.183346	0.234404	0.150854	0.095154	0.092833	0.113721	0.155496	0.160137	0.229762	0.271537	0.000000	4.093947
3	0.501300	0.366691	0.392221	0.320275	0.394541	0.199592	0.181025	0.306350	0.269216	0.118362	0.090512	0.132287	0.129967	0.143892	0.218362	0.290104	0.000000	4.052172
4	0.431675	0.227442	0.118362	0.048737	0.081229	0.174062	0.266896	0.429354	0.301708	0.143892	0.104437	0.123004	0.183346	0.194950	0.336521	0.459525	0.000000	3.625139
5	0.728741	0.136929	0.034812	0.032492	0.04983	0.153175	0.561641	0.761233	0.749629	0.343483	0.257612	0.239046	0.380616	0.617341	1.038091	1.318232	0.000000	7.145056
6	0.443279	0.023208	0.000000	0.000000	0.009283	0.020887	0.181025	0.406146	0.594133	0.187987	0.194950	0.125325	0.308671	0.754270	1.248608	1.290382	0.000000	5.788154
7	0.192771	0.004642	0.000000	0.000000	0.000000	0.009283	0.053379	0.102117	0.320275	0.097475	0.058021	0.078908	0.255291	0.633587	0.977070	0.751949	0.000000	3.539268
8	0.058021	0.000000	0.000000	0.000000	0.000000	0.000000	0.011604	0.034812	0.092833	0.032492	0.009283	0.016246	0.113721	0.222800	0.503620	0.313312	0.000000	1.408745
9	0.039454	0.000000	0.000000	0.000000	0.000000	0.000000	0.004642	0.018567	0.04983	0.009283	0.004642	0.004642	0.048737	0.064983	0.204233	0.162458	0.000000	0.626252
10	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321	0.006962	0.000000	0.000000	0.000000	0.002321	0.004642	0.016246	0.000000	0.032492
11	0.009000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.002321	0.006962	0.000000	0.009283
<b>Subtotal</b>	<b>2.815169</b>	<b>1.186266</b>	<b>1.178662</b>	<b>0.823893</b>	<b>0.847104</b>	<b>0.768195</b>	<b>1.443357</b>	<b>2.282982</b>	<b>2.545952</b>	<b>1.035091</b>	<b>0.812291</b>	<b>0.533179</b>	<b>1.575845</b>	<b>2.794281</b>	<b>4.757705</b>	<b>4.880709</b>	<b>0.023208</b>	<b>30.614092</b>
5 (E) 1 (Calm)																	0.125325	0.125325
2	0.686966	0.																



# ATTACHMENT B

**Peach Bottom  
Joint Frequency Distribution  
1984-1988**  
Tower 1A/River Tower  
45' River Tower wind  
89'-33' Tower 1A Delta T

		Wind Direction Category																	
Wind Speed Category <sup>(1)</sup>		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Calms	Total
1 (A)	1(Calm)																	0	0
	2	48	50	50	45	40	42	35	23	28	17	14	25	18	22	18	33		508
	3	41	33	31	44	82	90	88	27	30	14	15	8	19	20	14	38		594
	4	42	26	26	32	88	99	88	58	18	8	4	0	9	17	24	36		575
	5	78	51	47	83	92	184	249	79	39	15	9	9	14	12	105	89		1135
	6	112	45	26	31	58	83	240	112	64	22	13	12	19	18	146	153		1154
	7	103	19	17	7	22	26	121	131	77	19	23	20	27	39	151	189		991
	8	90	11	2	8	3	10	27	135	50	9	1	4	21	29	160	217		777
	9	78	11	4	1	1	9	10	103	44	7	0	1	22	76	267	348		982
	10	24	1	1	0	0	2	0	11	0	1	0	0	0	26	131	105		302
	11	5	0	0	0	0	0	0	2	0	0	0	0	0	11	72	43		133
	Subtotal		621	247	204	231	386	545	858	681	350	112	79	79	148	270	1088	1251	0
2 (B)	1(Calm)																	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Subtotal		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3 (C)	1(Calm)																	1	1
	2	16	17	18	7	14	17	19	8	7	3	3	6	7	6	11	10		169
	3	16	16	15	22	22	27	29	11	6	1	2	4	3	7	13	21		218
	4	15	10	10	30	44	30	26	8	5	1	3	4	2	8	13	22		231
	5	40	18	25	29	62	73	86	39	16	14	10	9	13	12	60	42		548
	6	47	28	30	14	28	51	70	41	22	9	19	12	26	21	54	48		520
	7	45	10	9	5	20	41	48	41	31	10	23	17	32	51	71	73		527
	8	42	9	5	1	6	13	20	48	18	2	6	5	20	44	81	66		386
	9	34	0	3	1	0	10	8	26	7	3	3	4	16	112	172	128		527
	10	5	0	1	0	0	2	3	7	0	1	0	1	1	55	68	47		191
	11	0	0	0	0	0	0	0	2	0	0	0	0	15	51	26			94
	Subtotal		263	108	116	109	196	264	309	231	112	44	68	62	120	331	594	483	1
4 (D)	1(Calm)																	1	1
	2	58	32	23	45	46	55	42	25	16	9	15	13	17	15	30	42		483
	3	34	30	47	36	46	39	62	24	18	8	10	15	16	25	31	28		469
	4	27	30	63	55	73	71	94	32	23	17	17	19	16	36	58	43		674
	5	110	60	83	93	119	162	213	98	74	39	37	48	67	68	122	90		1483
	6	120	53	42	39	80	125	219	146	75	39	39	70	95	105	181	120		1548
	7	93	32	18	21	58	89	97	197	60	17	38	27	87	161	234	126		1353
	8	60	21	7	6	17	48	45	112	47	15	22	10	55	229	219	152		1065
	9	45	14	4	1	13	29	32	99	23	7	5	6	64	432	422	237		1433
	10	7	2	0	0	3	4	6	41	1	0	0	0	6	124	259	111		564
	11	3	1	0	0	0	0	1	4	0	0	0	0	1	31	107	43		191
	Subtotal		557	275	287	296	459	622	811	778	337	151	181	288	424	1226	1653	932	1
5 (E)	1(Calm)																	4	4
	2	65	28	29	24	36	50	69	44	27	27	29	32	29	49	78			642
	3	40	32	16	32	28	59	86	36	10	18	34	20	33	33	34	83		594
	4	38	25	30	30	34	68	127	45	48	30	35	25	45	35	58	59		735
	5	87	27	35	50	47	90	171	127	87	16	43	53	73	81	148	71		1206
	6	97	21	18	22	36	80	143	160	72	23	23	30	63	131	164	70		1183
	7	71	25	12	8	19	49	84	158	40	4	18	6	22	134	192	90		932
	8	39	7	4	1	9	13	90	13	2	3	1	11	120	137	74			540
	9	29	1	0	2	14	20	18	68	9	1	1	2	87	150	70			473
	10	2	0	0	0	7	0	0	25	0	0	0	0	10	44	20			114
	11	0	0	0	0	0	2	1	1	0	0	0	0	10	6	3			23
	Subtotal		468	166	144	174	230	431	754	312	121	184	165	281	670	979	618		4
6 (F)	1(Calm)																	4	4
	2	64	37	30	19	36	63	88	71	53	21	33	28	61	54	103	102		883
	3	27	15	18	23	24	33	80	48	46	30	42	60	60	45	70	74		695
	4	29	14	15	6	22	37	93	73	44	21	28	41	65	45	67	58		658
	5	53	14	17	11	17	52	111	135	73	17	21	33	53	105	119	69		600
	6	28	4	11	8	4	30	70	127	44	15	8	15	25	81	128	60		658
	7	14	1	1	1	4	11	20	85	26	5	0	4	5	74	104	46		401
	8	2	0	0	1	1	0	1	19	9	0	0	0	2	28	45	19		127
	9	0	0	0	0	1	10	0	10	3	0	0	0	0	5	7	9		45
	10	0	0	0	0	3	0	0	0	0	0	0	0	1	0	0	2		6
	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0		2
	Subtotal		217	89	82	70	121	226	463	566	298	109	132	181	272	437	645	439	4





# ATTACHMENT B

**Peach Bottom**  
**Joint Frequency Distribution**  
 1984-1988  
 Tower 1A/River Tower  
 45' River Tower wind  
 89'-33' Tower 1A Delta T

Wind Speed Category <sup>(1)</sup>	Wind Direction Category																Calm	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16		
1 (Calm)	0.114169	0.118926	0.118926	0.107033	0.095141	0.099898	0.083248	0.054706	0.065988	0.040435	0.033298	0.059463	0.042813	0.052327	0.042813	0.078491	0.000000	0.000000
2	0.097519	0.078491	0.073734	0.104655	0.195038	0.214067	0.209310	0.064220	0.071356	0.033299	0.035678	0.019028	0.045192	0.047570	0.033299	0.090384	0.000000	1.412838
3	0.039898	0.061841	0.061841	0.076113	0.208310	0.254753	0.209310	0.137954	0.042813	0.019028	0.009514	0.000000	0.021407	0.040435	0.057084	0.085627	0.000000	1.367647
4	0.185524	0.121304	0.111790	0.149847	0.218824	0.437647	0.592251	0.187903	0.092762	0.035678	0.021407	0.021407	0.033299	0.028542	0.249744	0.211688	0.000000	2.696611
5	0.266394	0.107033	0.061841	0.073734	0.137954	0.187417	0.570844	0.266394	0.152225	0.052327	0.030921	0.028542	0.045192	0.042813	0.347264	0.363913	0.000000	2.744809
6	0.244987	0.045192	0.040435	0.016650	0.052327	0.061841	0.287801	0.311586	0.183146	0.045192	0.054706	0.047570	0.054220	0.092762	0.359156	0.449540	0.000000	2.357111
7	0.214067	0.026164	0.004757	0.019028	0.007136	0.023785	0.064220	0.321100	0.118926	0.021407	0.002379	0.009514	0.049949	0.068977	0.380563	0.516138	0.000000	1.848108
8	0.185524	0.026164	0.009514	0.002379	0.002379	0.021407	0.023785	0.244987	0.104655	0.016650	0.000000	0.000000	0.023279	0.052327	0.180767	0.635064	0.000000	2.335704
9	0.057084	0.002379	0.002379	0.000000	0.000000	0.004757	0.000000	0.026164	0.000000	0.002379	0.000000	0.000000	0.000000	0.000000	0.061841	0.311586	0.000000	0.718312
10	0.011893	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.004757	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.026164	0.171253	0.000000	0.316343
Subtotal	1.477059	0.587494	0.485218	0.549437	0.918108	1.296292	2.040768	1.619770	0.832461	0.286394	0.187903	0.187903	0.354399	0.642200	2.587827	2.975825	0.000000	17.068777
1 (Calm)	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
2	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
3	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
4	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
5	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
6	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
7	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
8	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
9	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
10	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
11	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Subtotal	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
1 (Calm)	0.038056	0.040435	0.042813	0.016650	0.033299	0.040435	0.045192	0.019028	0.016650	0.007136	0.007136	0.014271	0.016650	0.014271	0.026164	0.023785	0.002379	0.002379
2	0.045192	0.038056	0.052327	0.052327	0.052327	0.064220	0.068977	0.026164	0.014271	0.002379	0.004757	0.009514	0.007136	0.016650	0.030921	0.049949	0.000000	0.518517
3	0.035678	0.023785	0.023785	0.071356	0.104655	0.171356	0.061841	0.019028	0.011893	0.002379	0.007136	0.009514	0.004757	0.019028	0.030921	0.052327	0.000000	0.549437
4	0.095141	0.042813	0.059463	0.068977	0.147468	0.173632	0.204552	0.092762	0.038056	0.033299	0.023785	0.021407	0.030921	0.028542	0.142711	0.099898	0.000000	1.303427
5	0.111790	0.066598	0.071356	0.033299	0.066598	0.121304	0.166496	0.097519	0.052327	0.021407	0.045192	0.028542	0.061841	0.049949	0.128440	0.114169	0.000000	1.236829
6	0.107033	0.023785	0.021407	0.011893	0.047570	0.097519	0.114169	0.097519	0.073734	0.023785	0.054706	0.040435	0.076113	0.121304	0.168875	0.173632	0.000000	1.253479
7	0.099898	0.021407	0.011893	0.002379	0.014271	0.030921	0.047570	0.114169	0.042813	0.004757	0.014271	0.011893	0.047570	0.104655	0.192660	0.156892	0.000000	0.918108
8	0.080870	0.000000	0.007136	0.002379	0.002379	0.002379	0.019028	0.061841	0.016650	0.007136	0.007136	0.011893	0.038056	0.266394	0.409105	0.304450	0.000000	1.253479
9	0.011893	0.000000	0.002379	0.000000	0.000000	0.004757	0.007136	0.016650	0.000000	0.002379	0.000000	0.002379	0.002379	0.130818	0.161739	0.111790	0.000000	0.454297
10	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.004757	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.121304	0.061841	0.000000	0.223581
Subtotal	0.625550	0.250682	0.279508	0.259258	0.468189	0.827929	1.734852	0.549437	0.266394	0.104655	0.164118	0.147468	0.285422	0.787289	1.412839	1.488824	0.002379	8.115501
1 (Calm)	0.137954	0.076113	0.054706	0.107033	0.109412	0.130818	0.099898	0.059463	0.038056	0.021407	0.035678	0.030921	0.040435	0.035678	0.071356	0.099898	0.000000	1.148824
2	0.080870	0.071356	0.016650	0.085627	0.109412	0.092762	0.147468	0.057084	0.042813	0.019028	-0.023785	0.035678	0.038056	0.073734	0.066598	0.115525	0.000000	1.155525
3	0.064220	0.071356	0.149847	0.130818	0.173632	0.168875	0.223581	0.076113	0.054706	0.040435	0.040435	0.045192	0.038056	0.085627	0.137954	0.102276	0.000000	1.603121
4	0.261637	0.142711	0.197417	0.221202	0.283044	0.385320	0.506824	0.233095	0.176010	0.092762	0.080000	0.114169	0.159361	0.161739	0.290179	0.214067	0.000000	3.527341
5	0.285422	0.126061	0.099898	0.092762	0.190281	0.297315	0.520895	0.347264	0.178389	0.092762	0.092762	0.166496	0.225959	0.249744	0.430512	0.285422	0.000000	3.681945
6	0.221202	0.076113	0.042813	0.049949	0.137954	0.211688	0.230716	0.488568	0.142711	0.040435	0.085627	0.064220	0.206931	0.382941	0.556573	0.296693	0.000000	3.218134
7	0.142711	0.049949	0.016650	0.014271	0.040435	0.114169	0.107033	0.266394	0.111790	0.035678	0.052327	0.023785	0.130818	0.544680	0.520895	0.361535	0.000000	2.533121
8	0.107033	0.033299	0.009514	0.002379	0.030921	0.068977	0.076113	0.235473	0.054706	0.016650	0.011893	0.014271	0.152225	0.1027519	1.003734	0.563709	0.000000	3.408415
9	0.016650	0.004757	0.000000	0.000000	0.007136	0.009514	0.014271	0.097519	0.002379	0.000000	0.000000	0.000000	0.014271	0.294936	0.616036	0.264015	0.000000	1.341484
10	0.007136	0.002379	0.000000	0.000000	0.000000	0.000000	0.002379	0.009514	0.000000	0.000000	0.000000	0.000000	0.002379	0.073734	0.254501	0.102276	0.000000	0.454297
Subtotal	1.324834	0.634092	0.682634	0.704041	1.082225	1.479438	1.928977	1.850486	0.801560	0.359156	0.430512	0.494732	1.008491	2.916062	3.955474	2.359489	0.002379	22.034584
1 (Calm)	0.154604	0.066598	0.068977	0.057084	0.085627	0.118926	0.164118	0.104655	0.064220	0.064220	0.068977	0.076113	0.068977	0.114169	0.185524	0.009514	0.009514	
2	0.095141	0.076113	0.038056	0.076113	0.066598	0.140333	0.204552	0.085627	0.023785	0.042813	0.080870	0.047570	0.078491	0.080870	0.197417	0.000000	1.412838	
3	0.090384	0.059463	0.071356	0.083248	0.080870	0.161739	0.302072	0.107033	0.114169	0.071356	0.083248	0.059						



# ATTACHMENT C

## **PAVAN Input and Output Files**

**(For convenience of review, PAVAN output was shortened to include only the printout of input cards and summary of X/Q results)**

Off-Gas Stack to the EAB and LPZ (Tower 2 Meteorology, RG 1.23, Revision 1 Wind Speed Categories).....	2
Units 2 and 3 Reactor Building Stacks, Reactor Building Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch to EAB and LPZ (Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories).....	10
Off-Gas Stack to Control Room Intake (209 and 280 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories) .....	16
Off-Gas Stack to Control Room Intake (300 and 500 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories) .....	23
Off-Gas Stack to Control Room Intake (750 and 1000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories) .....	30
Off-Gas Stack to Control Room Intake (1500 and 2000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories).....	37
Off-Gas Stack to Control Room Intake (3000 and 4000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories).....	44
Off-Gas Stack to Control Room Intake (5000 and 6000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories).....	51
Units 2 and 3 Reactor Building Stacks, Reactor Building Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch to EAB (River Tower/Tower 1A Meteorology; RG 1.23, Revision 1 Wind Speed Categories).....	58

# ATTACHMENT C

## Off-Gas Stack to the EAB and LPZ (Tower 2 Meteorology, RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
 Peach Bottom  
 97.5 meters

Stack Release

10.1-96.3 meters

PB, Tower 2 84-88 met data, RG 1.23 R1 wind cats, 320 ft wind, 33-316 ft Delta T

11	2	54	31	52	4	97	5	0							
0	0	0	0	2	6	5	0		0	0	0	0	0	0	0
0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0
0	2	10	10	15	3	0	0	0	0	0	0	0	0	0	0
5	6	10	23	59	25	2	0	0	1	2	0	0	0	0	1
1	3	11	18	43	40	10	4	2	2	2	0	1	3	0	0
0	6	10	11	13	17	9	0	7	4	3	3	2	3	0	5
0	1	2	13	8	3	9	0	4	3	0	6	13	7	3	4
2	4	9	11	2	3	7	0	6	2	2	1	14	5	2	14
1	2	0	1	0	1	0	0	0	0	0	2	10	2	0	1
1	0	0	0	0	1	0	0	0	0	0	1	6	5	1	1
0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
0	1	1	9	5	0	2	0	0	0	0	0	0	0	0	0
1	7	5	8	21	5	1	0	0	0	0	0	1	0	1	0
12	15	9	11	34	19	6	1	1	4	3	1	3	1	2	3
1	11	11	18	6	21	11	4	4	4	4	2	3	5	1	7
2	5	4	2	5	9	13	5	17	9	6	5	13	2	1	12
3	0	3	1	3	0	9	6	14	5	6	7	10	8	3	15
8	2	1	1	0	2	5	3	22	5	3	13	21	15	6	20
1	3	0	0	0	1	1	1	6	1	1	2	11	12	5	6
0	0	1	0	0	0	0	0	1	1	0	1	7	10	0	0
0	2	2	1	0	0	0	0	0	0	0	0	0	0	0	0
0	3	10	14	1	0	0	0	0	0	0	0	0	0	0	0
4	7	11	16	31	17	2	0	1	0	0	0	0	0	0	1
18	14	15	17	17	40	6	4	11	4	7	3	2	2	3	16
26	12	8	11	10	21	26	13	20	13	9	4	16	6	8	35
21	6	3	8	5	11	31	10	40	14	15	14	23	13	9	45
8	8	0	3	2	3	15	12	37	17	11	15	11	21	18	43
14	2	4	2	2	3	7	5	48	18	16	24	48	45	26	74
4	1	0	0	1	2	0	1	10	0	3	3	29	27	22	14
1	3	0	0	0	0	0	0	1	0	2	2	16	33	12	4
18	18	28	26	28	20	14	13	12	6	9	6	8	19	8	10
41	40	80	93	87	66	31	22	29	17	23	9	18	19	28	40
67	53	78	99	130	77	54	50	39	31	28	24	30	19	40	50
209	119	120	174	227	179	192	134	171	110	98	90	89	59	118	231
216	175	125	187	215	168	282	234	320	203	128	80	109	115	186	390
237	151	118	123	134	129	212	204	330	193	142	89	134	160	235	438
233	99	80	54	103	102	129	147	274	132	80	103	142	196	332	406
278	113	52	44	87	94	107	58	345	108	91	139	311	543	821	694
69	28	13	11	24	24	15	10	96	21	15	20	211	392	489	230
25	10	10	2	18	7	8	1	40	6	5	12	124	227	256	94
21	15	15	20	24	17	26	16	26	16	17	19	30	17	23	11
39	29	21	41	36	43	35	43	44	40	42	35	24	19	16	23

# ATTACHMENT C

50. 43. 35. 51. 65. 48. 90. 69. 60. 65. 63. 36. 42. 23. 30. 36.  
137. 92. 91. 138. 168. 113. 186. 176. 263. 196. 164. 111. 102. 82. 112. 115.  
177. 131. 95. 87. 123. 134. 205. 234. 432. 273. 191. 116. 120. 116. 154. 200.  
180. 79. 69. 40. 68. 116. 152. 195. 423. 257. 165. 149. 193. 161. 255. 213.  
102. 30. 25. 9. 37. 61. 88. 142. 284. 182. 99. 157. 213. 232. 277. 276.  
110. 26. 17. 6. 39. 46. 69. 103. 367. 150. 159. 177. 417. 441. 493. 336.  
24. 10. 3. 4. 11. 20. 16. 11. 72. 19. 27. 38. 88. 124. 101. 48.  
8. 1. 6. 1. 21. 3. 9. 1. 9. 2. 2. 2. 10. 12. 10. 14.  
16. 7. 13. 10. 11. 12. 10. 12. 12. 12. 15. 15. 14. 13. 13. 7.  
10. 12. 9. 16. 20. 11. 18. 20. 11. 20. 17. 18. 16. 15. 13. 15.  
26. 13. 14. 10. 13. 18. 27. 34. 33. 29. 27. 36. 22. 18. 18. 20.  
53. 19. 18. 17. 15. 28. 43. 44. 75. 89. 99. 64. 43. 39. 60. 59.  
62. 19. 7. 10. 14. 18. 37. 32. 89. 72. 105. 77. 88. 49. 69. 53.  
29. 9. 6. 0. 5. 11. 18. 46. 46. 46. 66. 85. 85. 74. 87. 57.  
12. 4. 3. 0. 0. 2. 7. 15. 40. 19. 31. 57. 85. 55. 67. 47.  
2. 0. 0. 0. 0. 1. 4. 6. 24. 20. 23. 80. 128. 104. 61. 19.  
0. 0. 0. 0. 0. 0. 0. 0. 1. 3. 1. 21. 23. 23. 0. 5.  
1. 0. 0. 0. 4. 0. 0. 0. 0. 0. 0. 1. 1. 0. 0. 0.  
7. 9. 6. 6. 8. 2. 1. 7. 8. 8. 1. 10. 8. 8. 7. 10.  
4. 5. 5. 4. 5. 3. 3. 2. 9. 1. 5. 8. 5. 6. 6. 9.  
4. 9. 5. 4. 5. 1. 11. 4. 8. 9. 6. 8. 7. 8. 11. 12.  
35. 8. 15. 13. 7. 5. 12. 5. 22. 19. 22. 19. 25. 22. 44. 34.  
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# ATTACHMENT C

Copyright (c) 1990 Ergo Computing, Inc. for Lahey

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/21/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 PB, Tower 2 84-88 met data, RG 1.23 R1 wind cats, 320 ft wind, 33-316 ft Delta T 6 11 42771 2
7 0.500 2584.000 54.300 152.400 97.500
8 0.000 0.000 0.000 2.000 6.000 5.000 0.000
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9 21.000 6.000 3.000 8.000 5.000 11.000 31.000 10.000 40.000 14.000 15.000 14.000 23.000 13.000 9.000 45.000
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9 41.000 40.000 80.000 93.000 87.000 66.000 31.000 22.000 29.000 17.000 23.000 9.000 18.000 19.000 28.000 40.000
9 67.000 53.000 78.000 99.000 130.000 77.000 54.000 50.000 39.000 31.000 28.000 24.000 30.000 19.000 40.000 50.000
9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
9 233.000 99.000 80.000 54.000 103.000 102.000 129.000 147.000 274.000 132.000 80.000 103.000 142.000 196.000 332.000 406.000
9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
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# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/21/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: PB, Tower 2 84-88 met data, RG 1.23 R1 wind cats, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |           |            |          |                          |                |           | DOWNWIND<br>SECTOR |
|--------------------------------------|---|-----------|------------|----------|--------------------------|----------------|-----------|--------------------|
|                                      | 0-2 HOURS                                       | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE | IN SECTOR |                    |
| S 823.                               | 2.47E-06  | 8.45E-07  | 4.94E-07   | 1.54E-07 | 2.90E-08                 | 3.74E-09       | 4.0       | S                  |
| SSW 823.                             | 2.43E-06  | 8.70E-07  | 5.20E-07   | 1.70E-07 | 3.43E-08                 | 4.82E-09       | 4.1       | SSW                |
| SW 823.                              | 6.02E-06  | 1.88E-06  | 1.05E-06   | 2.98E-07 | 4.87E-08                 | 5.31E-09       | 43.7      | SW                 |
| WSW 823.                             | 5.10E-06  | 1.81E-06  | 1.08E-06   | 3.53E-07 | 7.05E-08                 | 9.84E-09       | 27.3      | WSW                |
| W 823.                               | 3.75E-06  | 1.54E-06  | 9.83E-07   | 3.73E-07 | 9.29E-08                 | 1.69E-08       | 13.4      | W                  |
| WNW 823.                             | 4.51E-06  | 1.66E-06  | 1.01E-06   | 3.40E-07 | 7.14E-08                 | 1.06E-08       | 19.2      | WNW                |
| NW 823.                              | 4.90E-06  | 1.56E-06  | 8.79E-07   | 2.54E-07 | 4.26E-08                 | 4.81E-09       | 26.5      | NW                 |
| NNW 823.                             | 3.49E-06  | 8.84E-07  | 4.44E-07   | 1.00E-07 | 1.17E-08                 | 8.55E-10       | 12.8      | NNW                |
| N 823.                               | 5.56E-06  | 1.55E-06  | 8.22E-07   | 2.06E-07 | 2.83E-08                 | 2.50E-09       | 36.1      | N                  |
| NNE 823.                             | 3.33E-06  | 9.22E-07  | 4.85E-07   | 1.21E-07 | 1.64E-08                 | 1.42E-09       | 11.6      | NNE                |
| NE 823.                              | 3.38E-06  | 9.08E-07  | 4.71E-07   | 1.13E-07 | 1.46E-08                 | 1.19E-09       | 12.4      | NE                 |
| ENE 823.                             | 1.99E-06  | 5.82E-07  | 3.15E-07   | 8.33E-08 | 1.23E-08                 | 1.19E-09       | 3.4       | ENE                |
| E 823.                               | 1.50E-06  | 5.31E-07  | 3.16E-07   | 1.03E-07 | 2.04E-08                 | 2.82E-09       | 1.8       | E                  |
| ESE 823.                             | 1.89E-06  | 6.03E-07  | 3.40E-07   | 9.82E-08 | 1.65E-08                 | 1.86E-09       | 3.5       | ESE                |
| SE 823.                              | 1.41E-06  | 4.13E-07  | 2.23E-07   | 5.85E-08 | 8.58E-09                 | 8.20E-10       | 1.2       | SE                 |
| SSE 823.                             | 1.98E-06  | 7.65E-07  | 4.76E-07   | 1.69E-07 | 3.85E-08                 | 6.28E-09       | 1.6       | SSE                |
| MAX X/Q                              | 6.02E-06  |           |            |          | TOTAL HOURS AROUND SITE: | 222.9          |           |                    |
| SRP 2.3.4 823.                       | 9.17E-06  | 3.24E-06  | 1.92E-06   | 6.22E-07 | 1.23E-07                 | 1.69E-08       |           |                    |
| SITE LIMIT                           | 0.00E+00  | 0.00E+00  | 0.00E+00   | 0.00E+00 | 0.00E+00                 | 1.69E-08       |           |                    |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND DISTANCE FUMIGATION<br>SECTOR (METERS) | X/Q      |
|---|----------|
| S 823.  | 5.30E-05 |
| SSW 823.  | 4.79E-05 |
| SW 823.   | 4.58E-05 |
| WSW 823.  | 5.01E-05 |
| W 823.  | 5.30E-05 |
| WNW 823.  | 5.30E-05 |
| NW 823.   | 5.01E-05 |
| NNW 823.  | 4.22E-05 |
| N 823.  | 4.22E-05 |
| NNE 823.  | 4.22E-05 |
| NE 823.   | 4.22E-05 |
| ENE 823.  | 4.22E-05 |
| E 823.  | 4.22E-05 |
| ESE 823.  | 4.22E-05 |

## ATTACHMENT C

|     |      |          |
|-----|------|----------|
| SE  | 823. | 4.22E-05 |
| SSE | 823. | 5.30E-05 |

**\*\*NOTE\*\***: VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/21/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: PB, Tower 2 84-88 met data, RG 1.23 R1 wind cats, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)<br>VERSUS AVERAGING TIME |           |            |          |           |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |     | DOWNWIND<br>SECTOR |
|--------------------------------------|--|-----------|------------|----------|-----------|--------------------------|---|-----|--------------------|
|                                      | 0-2 HOURS  | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE           | IN SECTOR                                       |     |                    |
| S 7300.                              | 2.02E-06   | 9.61E-07  | 6.62E-07   | 2.95E-07 | 9.24E-08  | 2.23E-08                 | 3.4   | S   |                    |
| SSW 7300.                            | 1.94E-06   | 8.75E-07  | 5.88E-07   | 2.48E-07 | 7.20E-08  | 1.58E-08                 | 3.2   | SSW |                    |
| SW 7300.                             | 5.02E-06   | 2.20E-06  | 1.45E-06   | 5.93E-07 | 1.64E-07  | 3.39E-08                 | 36.9  | SW  |                    |
| WSW 7300.                            | 4.33E-06   | 1.92E-06  | 1.28E-06   | 5.27E-07 | 1.48E-07  | 3.13E-08                 | 25.8  | WSW |                    |
| W 7300.                              | 3.09E-06   | 1.41E-06  | 9.56E-07   | 4.09E-07 | 1.21E-07  | 2.73E-08                 | 10.0  | W   |                    |
| WNW 7300.                            | 3.84E-06   | 1.73E-06  | 1.16E-06   | 4.86E-07 | 1.40E-07  | 3.04E-08                 | 19.5  | WNW |                    |
| NW 7300.                             | 4.96E-06   | 2.24E-06  | 1.50E-06   | 6.32E-07 | 1.83E-07  | 4.00E-08                 | 32.1  | NW  |                    |
| NNW 7300.                            | 3.42E-06   | 1.56E-06  | 1.06E-06   | 4.51E-07 | 1.33E-07  | 2.99E-08                 | 14.3  | NNW |                    |
| N 7300.                              | 5.67E-06   | 2.71E-06  | 1.88E-06   | 8.44E-07 | 2.67E-07  | 6.56E-08                 | 43.7  | N   |                    |
| NNE 7300.                            | 3.30E-06   | 1.53E-06  | 1.04E-06   | 4.51E-07 | 1.36E-07  | 3.12E-08                 | 13.2  | NNE |                    |
| NE 7300.                             | 3.31E-06   | 1.49E-06  | 1.00E-06   | 4.24E-07 | 1.23E-07  | 2.70E-08                 | 13.6  | NE  |                    |
| ENE 7300.                            | 2.01E-06   | 9.11E-07  | 6.13E-07   | 2.60E-07 | 7.57E-08  | 1.68E-08                 | 4.0   | ENE |                    |
| E 7300.                              | 1.52E-06   | 7.20E-07  | 4.96E-07   | 2.21E-07 | 6.90E-08  | 1.66E-08                 | 2.2   | E   |                    |
| ESE 7300.                            | 1.85E-06   | 9.04E-07  | 6.31E-07   | 2.89E-07 | 9.44E-08  | 2.40E-08                 | 3.6   | ESE |                    |
| SE 7300.                             | 1.30E-06   | 6.65E-07  | 4.75E-07   | 2.29E-07 | 8.06E-08  | 2.24E-08                 | 1.4   | SE  |                    |
| SSE 7300.                            | 1.53E-06   | 7.79E-07  | 5.56E-07   | 2.68E-07 | 9.40E-08  | 2.61E-08                 | 1.3   | SSE |                    |
| MAX X/Q                              | 5.67E-06   |           |            |          |           | TOTAL HOURS AROUND SITE: | 228.2   |     |                    |
| SRP 2.3.4 7300.                      | 9.05E-06   | 4.01E-06  | 2.67E-06   | 1.10E-06 | 3.10E-07  | 6.56E-08                 |   |     |                    |
| SITE LIMIT                           | 0.00E+00   | 0.00E+00  | 0.00E+00   | 0.00E+00 | 0.00E+00  | 6.56E-08                 |   |     |                    |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

DOWNWIND DISTANCE FUMIGATION

| SECTOR (METERS) | X/Q      |
|-----------------|----------|
| S 7300.         | 9.20E-06 |
| SSW 7300.       | 9.80E-06 |
| SW 7300.        | 1.75E-05 |
| WSW 7300.       | 1.75E-05 |
| W 7300.         | 1.13E-05 |
| WNW 7300.       | 1.65E-05 |
| NW 7300.        | 1.75E-05 |
| NNW 7300.       | 1.33E-05 |
| N 7300.         | 1.75E-05 |
| NNE 7300.       | 1.33E-05 |
| NE 7300.        | 1.33E-05 |
| ENE 7300.       | 1.05E-05 |
| E 7300.         | 8.58E-06 |
| ESE 7300.       | 1.05E-05 |

## ATTACHMENT C

|     |       |          |
|-----|-------|----------|
| SE  | 7300. | 8.19E-06 |
| SSE | 7300. | 8.19E-06 |

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

## Units 2 and 3 Reactor Building Stacks, Reactor Building Personnel Access Doors, Railway Bay Doors, Roof Scuttle, and Ground-Level Hatch to EAB and LPZ (Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
 Peach Bottom  
 10.1 meters                      10.1-45.7 meters                      Ground Release

Peach Bottom, Tower 2 84-88 met data, 33 ft wind, 33-150 ft Delta T

| 11    | 0    | 0    | 0    | 10   | 54  | 26   | 15   |      |      |      |      |      |      |      |      |  |  |  |  |  |
|-------|------|------|------|------|-----|------|------|------|------|------|------|------|------|------|------|--|--|--|--|--|
| 2584. | 54.3 | 10.0 | 10.1 |      |     |      |      |      |      |      |      |      |      |      |      |  |  |  |  |  |
| 0     | 0    | 0    | 10   | 54   | 26  | 15   |      |      |      |      |      |      |      |      |      |  |  |  |  |  |
| 37.   | 63.  | 66.  | 49.  | 22.  | 20. | 12.  | 12.  | 4.   | 0.   | 0.   | 4.   | 5.   | 10.  | 19.  | 17.  |  |  |  |  |  |
| 51.   | 71.  | 76.  | 94.  | 83.  | 59. | 38.  | 21.  | 4.   | 3.   | 4.   | 3.   | 11.  | 6.   | 7.   | 26.  |  |  |  |  |  |
| 67.   | 41.  | 27.  | 27.  | 37.  | 56. | 43.  | 26.  | 12.  | 6.   | 14.  | 8.   | 25.  | 24.  | 17.  | 46.  |  |  |  |  |  |
| 95.   | 35.  | 4.   | 1.   | 7.   | 35. | 62.  | 48.  | 42.  | 28.  | 29.  | 23.  | 57.  | 65.  | 51.  | 125. |  |  |  |  |  |
| 26.   | 7.   | 1.   | 0.   | 0.   | 14. | 9.   | 20.  | 59.  | 22.  | 33.  | 26.  | 45.  | 34.  | 18.  | 88.  |  |  |  |  |  |
| 12.   | 0.   | 0.   | 0.   | 0.   | 1.  | 2.   | 13.  | 46.  | 14.  | 16.  | 9.   | 21.  | 12.  | 12.  | 32.  |  |  |  |  |  |
| 2.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 4.   | 16.  | 4.   | 2.   | 1.   | 4.   | 8.   | 6.   | 6.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 4.   | 8.   | 1.   | 2.   | 1.   | 3.   | 5.   | 1.   | 2.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 0.   | 1.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   |  |  |  |  |  |
| 25.   | 32.  | 31.  | 18.  | 16.  | 8.  | 10.  | 3.   | 5.   | 1.   | 2.   | 1.   | 7.   | 3.   | 6.   | 15.  |  |  |  |  |  |
| 35.   | 24.  | 33.  | 49.  | 45.  | 36. | 13.  | 10.  | 7.   | 1.   | 4.   | 5.   | 8.   | 9.   | 3.   | 23.  |  |  |  |  |  |
| 37.   | 27.  | 8.   | 13.  | 8.   | 19. | 18.  | 14.  | 14.  | 12.  | 13.  | 4.   | 16.  | 15.  | 11.  | 35.  |  |  |  |  |  |
| 97.   | 13.  | 3.   | 2.   | 4.   | 10. | 34.  | 47.  | 59.  | 25.  | 42.  | 31.  | 40.  | 45.  | 42.  | 98.  |  |  |  |  |  |
| 42.   | 2.   | 0.   | 0.   | 1.   | 3.  | 12.  | 25.  | 85.  | 25.  | 24.  | 17.  | 24.  | 37.  | 51.  | 117. |  |  |  |  |  |
| 7.    | 0.   | 0.   | 0.   | 0.   | 1.  | 1.   | 17.  | 66.  | 24.  | 12.  | 14.  | 30.  | 40.  | 43.  | 71.  |  |  |  |  |  |
| 4.    | 0.   | 0.   | 0.   | 0.   | 4.  | 0.   | 8.   | 27.  | 7.   | 2.   | 0.   | 7.   | 12.  | 19.  | 18.  |  |  |  |  |  |
| 1.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 3.   | 10.  | 0.   | 2.   | 0.   | 0.   | 10.  | 13.  | 4.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 1.   | 0.   | 0.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   |  |  |  |  |  |
| 18.   | 24.  | 10.  | 16.  | 10.  | 7.  | 7.   | 1.   | 3.   | 0.   | 2.   | 2.   | 3.   | 4.   | 4.   | 11.  |  |  |  |  |  |
| 14.   | 23.  | 17.  | 32.  | 25.  | 20. | 4.   | 4.   | 3.   | 0.   | 3.   | 2.   | 3.   | 3.   | 5.   | 22.  |  |  |  |  |  |
| 23.   | 6.   | 1.   | 7.   | 7.   | 8.  | 14.  | 14.  | 13.  | 4.   | 3.   | 7.   | 14.  | 9.   | 11.  | 22.  |  |  |  |  |  |
| 33.   | 4.   | 2.   | 1.   | 2.   | 2.  | 16.  | 34.  | 48.  | 17.  | 14.  | 10.  | 19.  | 25.  | 25.  | 75.  |  |  |  |  |  |
| 11.   | 0.   | 0.   | 0.   | 0.   | 1.  | 8.   | 13.  | 40.  | 19.  | 17.  | 13.  | 25.  | 22.  | 40.  | 95.  |  |  |  |  |  |
| 6.    | 1.   | 0.   | 0.   | 0.   | 0.  | 0.   | 8.   | 33.  | 15.  | 13.  | 13.  | 18.  | 30.  | 44.  | 48.  |  |  |  |  |  |
| 3.    | 0.   | 0.   | 0.   | 1.   | 0.  | 0.   | 3.   | 10.  | 1.   | 0.   | 0.   | 6.   | 12.  | 11.  | 19.  |  |  |  |  |  |
| 1.    | 0.   | 0.   | 0.   | 0.   | 1.  | 0.   | 2.   | 6.   | 0.   | 0.   | 0.   | 0.   | 8.   | 15.  | 8.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 1.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   |  |  |  |  |  |
| 0.    | 0.   | 0.   | 0.   | 0.   | 0.  | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   | 0.   |  |  |  |  |  |
| 179.  | 185. | 272. | 182. | 128. | 91. | 79.  | 101. | 65.  | 41.  | 40.  | 49.  | 67.  | 69.  | 99.  | 117. |  |  |  |  |  |
| 216.  | 158. | 169. | 138. | 170. | 86. | 78.  | 132. | 116. | 51.  | 39.  | 57.  | 56.  | 62.  | 93.  | 125. |  |  |  |  |  |
| 186.  | 98.  | 51.  | 21.  | 35.  | 75. | 115. | 185. | 130. | 62.  | 45.  | 53.  | 79.  | 84.  | 145. | 198. |  |  |  |  |  |
| 314.  | 59.  | 15.  | 14.  | 28.  | 66. | 242. | 328. | 323. | 148. | 111. | 103. | 164. | 266. | 446. | 568. |  |  |  |  |  |
| 191.  | 10.  | 0.   | 0.   | 4.   | 9.  | 78.  | 175. | 256. | 81.  | 84.  | 54.  | 133. | 325. | 538. | 556. |  |  |  |  |  |
| 85.   | 2.   | 0.   | 0.   | 0.   | 4.  | 23.  | 44.  | 138. | 42.  | 25.  | 34.  | 110. | 273. | 421. | 324. |  |  |  |  |  |
| 25.   | 0.   | 0.   | 0.   | 0.   | 0.  | 5.   | 15.  | 40.  | 14.  | 4.   | 7.   | 49.  | 96.  | 217. | 135. |  |  |  |  |  |
| 17.   | 0.   | 0.   | 0.   | 0.   | 0.  | 2.   | 8.   | 28.  | 4.   | 2.   | 2.   | 21.  | 28.  | 88.  | 70.  |  |  |  |  |  |
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# ATTACHMENT C

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# ATTACHMENT C

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USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Ground Release
3 10.1 meters 10.1-45.7 meters
4
5 Peach Bottom, Tower 2 84-88 met data, 33 ft wind, 33-150 ft Delta T 6 11 43088 0
7 0.500 2584.000 54.300 10.000 10.100
8 0.000 0.000 0.000 10.000 54.000 26.000 15.000
9 37.000 63.000 66.000 49.000 22.000 20.000 12.000 12.000 4.000 0.000 0.000 4.000 5.000 10.000 19.000 17.000
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9 67.000 41.000 27.000 27.000 37.000 56.000 43.000 26.000 12.000 6.000 14.000 8.000 25.000 24.000 17.000 46.000
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9 35.000 24.000 33.000 49.000 45.000 36.000 13.000 10.000 7.000 1.000 4.000 5.000 8.000 9.000 3.000 23.000
9 37.000 27.000 8.000 13.000 8.000 19.000 18.000 14.000 14.000 12.000 13.000 4.000 16.000 15.000 11.000 35.000
9 97.000 13.000 3.000 2.000 4.000 10.000 34.000 47.000 59.000 25.000 42.000 31.000 40.000 45.000 42.000 98.000
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9 33.000 4.000 2.000 1.000 2.000 2.000 16.000 34.000 48.000 17.000 14.000 10.000 19.000 25.000 25.000 75.000
9 11.000 0.000 0.000 0.000 0.000 1.000 8.000 13.000 40.000 19.000 17.000 13.000 25.000 22.000 40.000 95.000
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9 216.000 158.000 169.000 138.000 170.000 86.000 78.000 132.000 116.000 51.000 39.000 57.000 56.000 62.000 93.000 125.000
9 186.000 98.000 51.000 21.000 35.000 75.000 115.000 185.000 130.000 62.000 45.000 53.000 79.000 84.000 145.000 198.000
9 314.000 59.000 15.000 14.000 28.000 66.000 242.000 328.000 323.000 148.000 111.000 103.000 164.000 266.000 446.000 568.000
9 191.000 10.000 0.000 0.000 4.000 9.000 78.000 175.000 256.000 81.000 84.000 54.000 133.000 325.000 538.000 556.000
9 85.000 2.000 0.000 0.000 0.000 4.000 23.000 44.000 138.000 42.000 25.000 34.000 110.000 273.000 421.000 324.000
9 25.000 0.000 0.000 0.000 0.000 0.000 5.000 15.000 40.000 14.000 4.000 7.000 49.000 96.000 217.000 135.000
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# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 10.1 meters

TYPE OF RELEASE: Ground Release

DELTA-T HEIGHTS: 10.1-45.7 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 84-88 met data, 33 ft wind, 33-150 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)  
VERSUS  
AVERAGING TIME

| DOWNWIND SECTOR | DISTANCE (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |                          | HOURS PER YEAR MAX |                                  | DOWNWIND SECTOR |
|-----------------|-------------------|---|-----------|------------|----------|--------------------------|--------------------|----------------------------------|-----------------|
|                 |                   | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE     | 0-2 HR X/Q IS EXCEEDED IN SECTOR |                 |
| S               | 823.              | 1.81E-04  | 9.66E-05  | 7.06E-05   | 3.58E-05 | 1.35E-05                 | 4.09E-06           | 8.0                              | S               |
| SSW             | 823.              | 1.61E-04  | 8.23E-05  | 5.89E-05   | 2.84E-05 | 1.00E-05                 | 2.78E-06           | 285.0                            | SSW             |
| SW              | 823.              | 1.68E-04  | 8.61E-05  | 6.17E-05   | 2.99E-05 | 1.06E-05                 | 2.97E-06           | 6.8                              | SW              |
| WSW             | 823.              | 1.75E-04  | 8.86E-05  | 6.29E-05   | 3.00E-05 | 1.03E-05                 | 2.81E-06           | 8.5                              | WSW             |
| W               | 823.              | 2.23E-04  | 1.13E-04  | 8.08E-05   | 3.88E-05 | 1.35E-05                 | 3.73E-06           | 14.5                             | W               |
| WNW             | 823.              | 2.12E-04  | 1.07E-04  | 7.56E-05   | 3.58E-05 | 1.23E-05                 | 3.30E-06           | 11.5                             | WNW             |
| NW              | 823.              | 1.76E-04  | 9.13E-05  | 6.57E-05   | 3.22E-05 | 1.15E-05                 | 3.29E-06           | 7.3                              | NW              |
| NNW             | 823.              | 1.67E-04  | 8.90E-05  | 6.50E-05   | 3.29E-05 | 1.24E-05                 | 3.73E-06           | 6.4                              | NNW             |
| N               | 823.              | 1.69E-04  | 9.09E-05  | 6.67E-05   | 3.41E-05 | 1.30E-05                 | 3.98E-06           | 6.4                              | N               |
| NNE             | 823.              | 1.82E-04  | 9.13E-05  | 6.47E-05   | 3.06E-05 | 1.04E-05                 | 2.80E-06           | 8.5                              | NNE             |
| NE              | 823.              | 2.56E-04  | 1.27E-04  | 8.94E-05   | 4.18E-05 | 1.40E-05                 | 3.68E-06           | 19.0                             | NE              |
| ENE             | 823.              | 3.53E-04  | 1.83E-04  | 1.32E-04   | 6.47E-05 | 2.33E-05                 | 6.68E-06           | 43.2                             | ENE             |
| E               | 823.              | 3.54E-04  | 1.85E-04  | 1.34E-04   | 6.61E-05 | 2.40E-05                 | 6.97E-06           | 43.7                             | E               |
| ESE             | 823.              | 3.01E-04  | 1.59E-04  | 1.15E-04   | 5.75E-05 | 2.12E-05                 | 6.27E-06           | 29.2                             | ESE             |
| SE              | 823.              | 2.57E-04  | 1.38E-04  | 1.02E-04   | 5.19E-05 | 1.98E-05                 | 6.09E-06           | 19.8                             | SE              |
| SSE             | 823.              | 1.90E-04  | 1.03E-04  | 7.58E-05   | 3.91E-05 | 1.51E-05                 | 4.70E-06           | 9.8                              | SSE             |
| MAX X/Q         |                   | 3.54E-04  |           |            |          | TOTAL HOURS AROUND SITE: | 527.7              |                                  |                 |
| SRP 2.3.4       | 823.              | 5.79E-04  | 2.79E-04  | 1.93E-04   | 8.76E-05 | 2.81E-05                 | 6.97E-06           |                                  |                 |
| SITE LIMIT      |                   | 2.95E-04  | 1.59E-04  | 1.16E-04   | 5.95E-05 | 2.27E-05                 | 6.97E-06           |                                  |                 |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

\*\*NOTE\*\*: VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY. CHECK THE REASONABLENESS OF THE ENVELOPES COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 10.1 meters

TYPE OF RELEASE: Ground Release

DELTA-T HEIGHTS: 10.1-45.7 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 84-88 met data, 33 ft wind, 33-150 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)  
VERSUS  
AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) |       | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |           | DOWNWIND<br>SECTOR |
|--------------------------------------|-------|---|-----------|------------|----------|--------------------------|---|-----------|--------------------|
|                                      |       | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE                                  | IN SECTOR |                    |
| S                                    | 7300. | 1.94E-05  | 8.86E-06  | 5.99E-06   | 2.56E-06 | 7.56E-07                 | 1.70E-07  | 6.7       | S                  |
| SSW                                  | 7300. | 1.61E-05  | 7.10E-06  | 4.72E-06   | 1.95E-06 | 5.46E-07                 | 1.15E-07  | 244.4     | SSW                |
| SW                                   | 7300. | 1.70E-05  | 7.52E-06  | 5.01E-06   | 2.07E-06 | 5.81E-07                 | 1.23E-07  | 6.7       | SW                 |
| WSW                                  | 7300. | 1.91E-05  | 8.25E-06  | 5.42E-06   | 2.18E-06 | 5.90E-07                 | 1.19E-07  | 10.9      | WSW                |
| W                                    | 7300. | 2.66E-05  | 1.15E-05  | 7.54E-06   | 3.03E-06 | 8.16E-07                 | 1.64E-07  | 18.0      | W                  |
| WNW                                  | 7300. | 2.44E-05  | 1.05E-05  | 6.87E-06   | 2.75E-06 | 7.38E-07                 | 1.48E-07  | 9.5       | WNW                |
| NW                                   | 7300. | 1.84E-05  | 8.25E-06  | 5.52E-06   | 2.31E-06 | 6.63E-07                 | 1.44E-07  | 6.3       | NW                 |
| NNW                                  | 7300. | 1.67E-05  | 7.76E-06  | 5.28E-06   | 2.29E-06 | 6.92E-07                 | 1.60E-07  | 5.6       | NNW                |
| N                                    | 7300. | 1.71E-05  | 8.01E-06  | 5.47E-06   | 2.39E-06 | 7.31E-07                 | 1.71E-07  | 4.9       | N                  |
| NNE                                  | 7300. | 2.01E-05  | 8.68E-06  | 5.71E-06   | 2.30E-06 | 6.23E-07                 | 1.26E-07  | 6.6       | NNE                |
| NE                                   | 7300. | 3.15E-05  | 1.33E-05  | 8.60E-06   | 3.37E-06 | 8.76E-07                 | 1.69E-07  | 16.5      | NE                 |
| ENE                                  | 7300. | 4.71E-05  | 2.05E-05  | 1.36E-05   | 5.50E-06 | 1.51E-06                 | 3.09E-07  | 41.5      | ENE                |
| E                                    | 7300. | 4.82E-05  | 2.10E-05  | 1.39E-05   | 5.66E-06 | 1.55E-06                 | 3.20E-07  | 43.7      | E                  |
| ESE                                  | 7300. | 4.00E-05  | 1.76E-05  | 1.17E-05   | 4.82E-06 | 1.35E-06                 | 2.83E-07  | 31.1      | ESE                |
| SE                                   | 7300. | 3.20E-05  | 1.45E-05  | 9.76E-06   | 4.14E-06 | 1.21E-06                 | 2.67E-07  | 20.8      | SE                 |
| SSE                                  | 7300. | 2.10E-05  | 9.70E-06  | 6.59E-06   | 2.84E-06 | 8.51E-07                 | 1.95E-07  | 10.8      | SSE                |
| MAX X/Q                              |       | 4.82E-05  |           |            |          | TOTAL HOURS AROUND SITE: | 484.1   |           |                    |
| SRP 2.3.4                            | 7300. | 5.20E-05  | 2.24E-05  | 1.47E-05   | 5.91E-06 | 1.59E-06                 | 3.20E-07  |           |                    |
| SITE LIMIT                           |       | 3.65E-05  | 1.67E-05  | 1.13E-05   | 4.82E-06 | 1.42E-06                 | 3.20E-07  |           |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

\*\*NOTE\*\*: VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.



# ATTACHMENT C

21. 15. 15. 20. 24. 17. 26. 16. 26. 16. 17. 19. 30. 17. 23. 11.  
39. 29. 21. 41. 36. 43. 35. 43. 44. 40. 42. 35. 24. 19. 16. 23.  
50. 43. 35. 51. 65. 48. 90. 69. 60. 65. 63. 36. 42. 23. 30. 36.  
137. 92. 91. 138. 168. 113. 186. 176. 263. 196. 164. 111. 102. 82. 112. 115.  
177. 131. 95. 87. 123. 134. 205. 234. 432. 273. 191. 116. 120. 116. 154. 200.  
180. 79. 69. 40. 68. 116. 152. 195. 423. 257. 165. 149. 193. 161. 255. 213.  
102. 30. 25. 9. 37. 61. 88. 142. 284. 182. 99. 157. 213. 232. 277. 276.  
110. 26. 17. 6. 39. 46. 69. 103. 367. 150. 159. 177. 417. 441. 493. 336.  
24. 10. 3. 4. 11. 20. 16. 11. 72. 19. 27. 38. 88. 124. 101. 48.  
8. 1. 6. 1. 21. 3. 9. 1. 9. 2. 2. 2. 10. 12. 10. 14.  
16. 7. 13. 10. 11. 12. 10. 12. 12. 12. 15. 15. 14. 13. 13. 7.  
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4. 9. 5. 4. 5. 1. 11. 4. 8. 9. 6. 8. 7. 8. 11. 12.  
35. 8. 15. 13. 7. 5. 12. 5. 22. 19. 22. 19. 25. 22. 44. 34.  
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# ATTACHMENT C

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USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T 6 11 42771 1
7 0.500 2584.000 54.300 131.400 97.500
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9 41.000 40.000 80.000 93.000 87.000 66.000 31.000 22.000 29.000 17.000 23.000 9.000 18.000 19.000 28.000 40.000
9 67.000 53.000 78.000 99.000 130.000 77.000 54.000 50.000 39.000 31.000 28.000 24.000 30.000 19.000 40.000 50.000
9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
9 233.000 99.000 80.000 54.000 103.000 102.000 129.000 147.000 274.000 132.000 80.000 103.000 142.000 196.000 332.000 406.000
9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
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# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND SECTOR | DISTANCE (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |           |                | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED IN SECTOR | DOWNWIND SECTOR |
|-----------------|-------------------|---|-----------|------------|----------|-----------|----------------|---|-----------------|
|                 |                   | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE |   |                 |
| S               | 209.              | 1.67E-06  | 1.68E-07  | 5.33E-08   | 4.41E-09 | 1.23E-10  | 1.55E-12       | 7.4   | S               |
| SSW             | 209.              | 1.71E-06  | 1.98E-07  | 6.77E-08   | 6.55E-09 | 2.29E-10  | 3.80E-12       | 154.3   | SSW             |
| SW              | 209.              | 2.21E-06  | 2.86E-07  | 1.03E-07   | 1.12E-08 | 4.64E-10  | 9.45E-12       | 17.7  | SW              |
| WSW             | 209.              | 2.54E-06  | 3.47E-07  | 1.28E-07   | 1.48E-08 | 6.67E-10  | 1.50E-11       | 24.9  | WSW             |
| W               | 209.              | 3.31E-06  | 4.83E-07  | 1.84E-07   | 2.28E-08 | 1.14E-09  | 2.91E-11       | 43.7  | W               |
| WNW             | 209.              | 2.49E-06  | 3.44E-07  | 1.28E-07   | 1.50E-08 | 6.89E-10  | 1.59E-11       | 22.4  | WNW             |
| NW              | 209.              | 1.70E-06  | 2.05E-07  | 7.11E-08   | 7.16E-09 | 2.66E-10  | 4.72E-12       | 6.6   | NW              |
| NNW             | 209.              | 1.37E-06  | 1.23E-07  | 3.69E-08   | 2.71E-09 | 6.38E-11  | 6.49E-13       | 3.6   | NNW             |
| N               | 209.              | 1.55E-06  | 1.66E-07  | 5.44E-08   | 4.83E-09 | 1.49E-10  | 2.12E-12       | 3.9   | N               |
| NNE             | 209.              | 1.30E-06  | 1.36E-07  | 4.39E-08   | 3.80E-09 | 1.13E-10  | 1.53E-12       | 2.5   | NNE             |
| NE              | 209.              | 1.28E-06  | 1.31E-07  | 4.20E-08   | 3.54E-09 | 1.02E-10  | 1.32E-12       | 3.2   | NE              |
| ENE             | 209.              | 1.20E-06  | 1.23E-07  | 3.94E-08   | 3.32E-09 | 9.56E-11  | 1.25E-12       | 2.0   | ENE             |
| E               | 209.              | 1.42E-06  | 1.70E-07  | 5.86E-08   | 5.86E-09 | 2.14E-10  | 3.75E-12       | 3.4   | E               |
| ESE             | 209.              | 1.19E-06  | 1.35E-07  | 4.54E-08   | 4.29E-09 | 1.45E-10  | 2.30E-12       | 4.7   | ESE             |
| SE              | 209.              | 1.28E-06  | 1.12E-07  | 3.31E-08   | 2.35E-09 | 5.28E-11  | 5.08E-13       | 3.0   | SE              |
| SSE             | 209.              | 1.64E-06  | 1.79E-07  | 5.92E-08   | 5.37E-09 | 1.71E-10  | 2.51E-12       | 4.4   | SSE             |
| MAX X/Q         |                   | 3.31E-06  |           |            |          |           |                | TOTAL HOURS AROUND SITE: 307.8                            |                 |
| SRP 2.3.4       | 209.              | 2.12E-06  | 3.33E-07  | 1.32E-07   | 1.77E-08 | 9.91E-10  | 2.91E-11       |   |                 |
| SITE LIMIT      |                   | 2.12E-06  | 3.33E-07  | 1.32E-07   | 1.77E-08 | 9.91E-10  | 2.91E-11       |   |                 |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND SECTOR | DISTANCE (METERS) | FUMIGATION X/Q |
|-----------------|-------------------|----------------|
| S               | 209.              | 1.69E-04       |
| SSW             | 209.              | 1.69E-04       |
| SW              | 209.              | 1.69E-04       |
| WSW             | 209.              | 1.69E-04       |
| W               | 209.              | 1.69E-04       |
| WNW             | 209.              | 1.69E-04       |
| NW              | 209.              | 1.69E-04       |
| NNW             | 209.              | 1.69E-04       |
| N               | 209.              | 1.69E-04       |
| NNE             | 209.              | 1.69E-04       |
| NE              | 209.              | 1.69E-04       |
| ENE             | 209.              | 1.69E-04       |
| E               | 209.              | 1.69E-04       |
| ESE             | 209.              | 1.69E-04       |

## ATTACHMENT C

|     |      |          |
|-----|------|----------|
| SE  | 209. | 1.69E-04 |
| SSE | 209. | 1.69E-04 |

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.



# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND SECTOR | DISTANCE (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS EXCEEDED |           | DOWNWIND SECTOR |
|-----------------|-------------------|---|-----------|------------|----------|--------------------------|--|-----------|-----------------|
|                 |                   | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE                               | IN SECTOR |                 |
| S               | 280.              | 1.67E-06  | 3.64E-07  | 1.70E-07   | 3.25E-08 | 3.03E-09                 | 1.66E-10                                     | 7.4       | S               |
| SSW             | 280.              | 1.71E-06  | 4.30E-07  | 2.16E-07   | 4.83E-08 | 5.63E-09                 | 4.06E-10                                     | 154.3     | SSW             |
| SW              | 280.              | 2.21E-06  | 6.19E-07  | 3.28E-07   | 8.25E-08 | 1.14E-08                 | 1.01E-09                                     | 17.7      | SW              |
| WSW             | 280.              | 2.54E-06  | 7.52E-07  | 4.09E-07   | 1.09E-07 | 1.63E-08                 | 1.60E-09                                     | 24.9      | WSW             |
| W               | 280.              | 3.31E-06  | 1.04E-06  | 5.87E-07   | 1.68E-07 | 2.79E-08                 | 3.10E-09                                     | 43.7      | W               |
| WNW             | 280.              | 2.49E-06  | 7.45E-07  | 4.08E-07   | 1.10E-07 | 1.69E-08                 | 1.70E-09                                     | 22.4      | WNW             |
| NW              | 280.              | 1.70E-06  | 4.43E-07  | 2.26E-07   | 5.27E-08 | 6.51E-09                 | 5.04E-10                                     | 6.6       | NW              |
| NNW             | 280.              | 1.37E-06  | 2.66E-07  | 1.18E-07   | 2.00E-08 | 1.57E-09                 | 6.96E-11                                     | 3.6       | NNW             |
| N               | 280.              | 1.55E-06  | 3.60E-07  | 1.73E-07   | 3.56E-08 | 3.66E-09                 | 2.27E-10                                     | 3.9       | N               |
| NNE             | 280.              | 1.30E-06  | 2.94E-07  | 1.40E-07   | 2.80E-08 | 2.77E-09                 | 1.64E-10                                     | 2.5       | NNE             |
| NE              | 280.              | 1.28E-06  | 2.84E-07  | 1.34E-07   | 2.61E-08 | 2.49E-09                 | 1.41E-10                                     | 3.2       | NE              |
| ENE             | 280.              | 1.20E-06  | 2.66E-07  | 1.25E-07   | 2.45E-08 | 2.35E-09                 | 1.33E-10                                     | 2.0       | ENE             |
| E               | 280.              | 1.42E-06  | 3.67E-07  | 1.87E-07   | 4.31E-08 | 5.26E-09                 | 4.00E-10                                     | 3.4       | E               |
| ESE             | 280.              | 1.19E-06  | 2.92E-07  | 1.45E-07   | 3.16E-08 | 3.55E-09                 | 2.45E-10                                     | 4.7       | ESE             |
| SE              | 280.              | 1.28E-06  | 2.42E-07  | 1.05E-07   | 1.73E-08 | 1.30E-09                 | 5.45E-11                                     | 3.0       | SE              |
| SSE             | 280.              | 1.64E-06  | 3.88E-07  | 1.89E-07   | 3.95E-08 | 4.19E-09                 | 2.69E-10                                     | 4.4       | SSE             |
| MAX X/Q         |                   | 3.31E-06  |           |            |          | TOTAL HOURS AROUND SITE: | 307.8  |           |                 |
| SRP 2.3.4       | 280.              | 2.12E-06  | 7.22E-07  | 4.21E-07   | 1.30E-07 | 2.43E-08                 | 3.10E-09                                     |           |                 |
| SITE LIMIT      |                   | 2.12E-06  | 7.22E-07  | 4.21E-07   | 1.30E-07 | 2.43E-08                 | 3.10E-09                                     |           |                 |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND SECTOR | DISTANCE (METERS) | FUMIGATION X/Q |
|-----------------|-------------------|----------------|
| S               | 280.              | 1.30E-04       |
| SSW             | 280.              | 1.30E-04       |
| SW              | 280.              | 1.30E-04       |
| WSW             | 280.              | 1.30E-04       |
| W               | 280.              | 1.30E-04       |
| WNW             | 280.              | 1.30E-04       |
| NW              | 280.              | 1.30E-04       |
| NNW             | 280.              | 1.30E-04       |
| N               | 280.              | 1.30E-04       |
| NNE             | 280.              | 1.30E-04       |
| NE              | 280.              | 1.30E-04       |
| ENE             | 280.              | 1.30E-04       |
| E               | 280.              | 1.30E-04       |
| ESE             | 280.              | 1.30E-04       |

# ATTACHMENT C

SE 280. 1.30E-04  
 SSE 280. 1.30E-04

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
 CHECK THE REASONABLENESS OF THE ENVELOPES  
 COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
 FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

## Off-Gas Stack to Control Room Intake (300 and 500 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
 Peach Bottom Stack Release  
 97.5 meters 10.1-96.3 meters

Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

| 11    | 1     |       |      |     |     |     |     |     |     |     |     |     |     |     |     |    |    |
|-------|-------|-------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|----|----|
| 2584. | 54.31 | 131.4 | 97.5 |     |     |     |     |     |     |     |     |     |     |     |     |    |    |
| 0     | 0     | 0     | 2    | 6   | 5   | 0   |     |     |     |     |     |     |     |     |     |    |    |
| 0.    | 0.    | 0.    | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. |
| 0.    | 0.    | 0.    | 0.   | 3.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. |
| 0.    | 2.    | 10.   | 10.  | 15. | 3.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. |    |
| 5.    | 6.    | 10.   | 23.  | 59. | 25. | 2.  | 0.  | 0.  | 1.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1. |    |
| 1.    | 3.    | 11.   | 18.  | 43. | 40. | 10. | 4.  | 2.  | 2.  | 2.  | 0.  | 1.  | 3.  | 0.  | 0.  | 0. |    |
| 0.    | 6.    | 10.   | 11.  | 13. | 17. | 9.  | 0.  | 7.  | 4.  | 3.  | 3.  | 2.  | 3.  | 0.  | 5.  | 0. |    |
| 0.    | 1.    | 2.    | 13.  | 8.  | 3.  | 9.  | 0.  | 4.  | 3.  | 0.  | 6.  | 13. | 7.  | 3.  | 4.  | 0. |    |
| 2.    | 4.    | 9.    | 11.  | 2.  | 3.  | 7.  | 0.  | 6.  | 2.  | 2.  | 1.  | 14. | 5.  | 2.  | 14. | 0. |    |
| 1.    | 2.    | 0.    | 1.   | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 2.  | 10. | 2.  | 0.  | 1.  | 0. |    |
| 1.    | 0.    | 0.    | 0.   | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 6.  | 5.  | 1.  | 1.  | 0. |    |
| 0.    | 1.    | 1.    | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. |    |
| 0.    | 1.    | 1.    | 9.   | 5.  | 0.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. |    |
| 1.    | 7.    | 5.    | 8.   | 21. | 5.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 1.  | 0.  | 0. |    |
| 12.   | 15.   | 9.    | 11.  | 34. | 19. | 6.  | 1.  | 1.  | 4.  | 3.  | 1.  | 3.  | 1.  | 2.  | 3.  | 0. |    |
| 1.    | 11.   | 11.   | 18.  | 6.  | 21. | 11. | 4.  | 4.  | 4.  | 4.  | 2.  | 3.  | 5.  | 1.  | 7.  | 0. |    |
| 2.    | 5.    | 4.    | 2.   | 5.  | 9.  | 13. | 5.  | 17. | 9.  | 6.  | 5.  | 13. | 2.  | 1.  | 12. | 0. |    |
| 3.    | 0.    | 3.    | 1.   | 3.  | 0.  | 9.  | 6.  | 14. | 5.  | 6.  | 7.  | 10. | 8.  | 3.  | 15. | 0. |    |
| 8.    | 2.    | 1.    | 1.   | 0.  | 2.  | 5.  | 3.  | 22. | 5.  | 3.  | 13. | 21. | 15. | 6.  | 20. | 0. |    |
| 1.    | 3.    | 0.    | 0.   | 0.  | 1.  | 1.  | 1.  | 6.  | 1.  | 1.  | 2.  | 11. | 12. | 5.  | 6.  | 0. |    |
| 0.    | 0.    | 1.    | 0.   | 0.  | 0.  | 0.  | 0.  | 1.  | 1.  | 0.  | 1.  | 7.  | 10. | 0.  | 0.  | 0. |    |
| 0.    | 2.    | 2.    | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. |    |
| 0.    | 3.    | 10.   | 14.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. |    |
| 4.    | 7.    | 11.   | 16.  | 31. | 17. | 2.  | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0. |    |
| 18.   | 14.   | 15.   | 17.  | 17. | 40. | 6.  | 4.  | 11. | 4.  | 7.  | 3.  | 2.  | 2.  | 3.  | 16. | 0. |    |
| 26.   | 12.   | 8.    | 11.  | 10. | 21. | 26. | 13. | 20. | 13. | 9.  | 4.  | 16. | 6.  | 8.  | 35. | 0. |    |
| 21.   | 6.    | 3.    | 8.   | 5.  | 11. | 31. | 10. | 40. | 14. | 15. | 14. | 23. | 13. | 9.  | 45. | 0. |    |
| 8.    | 8.    | 0.    | 3.   | 2.  | 3.  | 15. | 12. | 37. | 17. | 11. | 15. | 11. | 21. | 18. | 43. | 0. |    |
| 14.   | 2.    | 4.    | 2.   | 2.  | 3.  | 7.  | 5.  | 48. | 18. | 16. | 24. | 48. | 45. | 26. | 74. | 0. |    |
| 4.    | 1.    | 0.    | 0.   | 1.  | 2.  | 0.  | 1.  | 10. | 0.  | 3.  | 3.  | 29. | 27. | 22. | 14. | 0. |    |
| 1.    | 3.    | 0.    | 0.   | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 2.  | 2.  | 16. | 33. | 12. | 4.  | 0. |    |
| 18.   | 18.   | 28.   | 26.  | 28. | 20. | 14. | 13. | 12. | 6.  | 9.  | 6.  | 8.  | 19. | 8.  | 10. | 0. |    |

# ATTACHMENT C

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# ATTACHMENT C

Copyright (c) 1990 Ergo Computing, Inc. for Lahey

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T 6 11 42771 1
7 0.500 2584.000 54.300 131.400 97.500
8 0.000 0.000 0.000 2.000 6.000 5.000 0.000
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9 67.000 53.000 78.000 99.000 130.000 77.000 54.000 50.000 39.000 31.000 28.000 24.000 30.000 19.000 40.000 50.000
9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
9 233.000 99.000 80.000 54.000 103.000 102.000 129.000 147.000 274.000 132.000 80.000 103.000 142.000 196.000 332.000 406.000
9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
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# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)<br>VERSUS AVERAGING TIME |           |            |          |           |                | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED IN SECTOR |  | DOWNWIND<br>SECTOR |
|--------------------------------------|--|-----------|------------|----------|-----------|----------------|---|--|--------------------|
|                                      | 0-2 HOURS  | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE |   |  |                    |
| S 300.                               | 1.67E-06   | 4.03E-07  | 1.98E-07   | 4.22E-08 | 4.60E-09  | 3.06E-10       | 7.4   |  | S                  |
| SSW 300.                             | 1.71E-06   | 4.75E-07  | 2.51E-07   | 6.26E-08 | 8.55E-09  | 7.48E-10       | 154.3   |  | SSW                |
| SW 300.                              | 2.21E-06   | 6.84E-07  | 3.81E-07   | 1.07E-07 | 1.72E-08  | 1.85E-09       | 17.7  |  | SW                 |
| WSW 300.                             | 2.54E-06   | 8.31E-07  | 4.75E-07   | 1.41E-07 | 2.48E-08  | 2.94E-09       | 24.9  |  | WSW                |
| W 300.                               | 3.31E-06   | 1.15E-06  | 6.82E-07   | 2.18E-07 | 4.23E-08  | 5.69E-09       | 43.7  |  | W                  |
| WNW 300.                             | 2.49E-06   | 8.24E-07  | 4.74E-07   | 1.43E-07 | 2.56E-08  | 3.11E-09       | 22.4  |  | WNW                |
| NW 300.                              | 1.70E-06   | 4.90E-07  | 2.63E-07   | 6.84E-08 | 9.88E-09  | 9.26E-10       | 6.6   |  | NW                 |
| NNW 300.                             | 1.37E-06   | 2.95E-07  | 1.37E-07   | 2.59E-08 | 2.38E-09  | 1.28E-10       | 3.6   |  | NNW                |
| N 300.                               | 1.55E-06   | 3.98E-07  | 2.02E-07   | 4.62E-08 | 5.56E-09  | 4.17E-10       | 3.9   |  | N                  |
| NNE 300.                             | 1.30E-06   | 3.25E-07  | 1.63E-07   | 3.63E-08 | 4.21E-09  | 3.01E-10       | 2.5   |  | NNE                |
| NE 300.                              | 1.28E-06   | 3.14E-07  | 1.55E-07   | 3.38E-08 | 3.78E-09  | 2.59E-10       | 3.2   |  | NE                 |
| ENE 300.                             | 1.20E-06   | 2.94E-07  | 1.46E-07   | 3.18E-08 | 3.56E-09  | 2.45E-10       | 2.0   |  | ENE                |
| E 300.                               | 1.42E-06   | 4.06E-07  | 2.17E-07   | 5.59E-08 | 7.97E-09  | 7.36E-10       | 3.4   |  | E                  |
| ESE 300.                             | 1.19E-06   | 3.23E-07  | 1.68E-07   | 4.10E-08 | 5.39E-09  | 4.51E-10       | 4.7   |  | ESE                |
| SE 300.                              | 1.28E-06   | 2.68E-07  | 1.23E-07   | 2.25E-08 | 1.97E-09  | 1.01E-10       | 3.0   |  | SE                 |
| SSE 300.                             | 1.64E-06   | 4.29E-07  | 2.20E-07   | 5.13E-08 | 6.36E-09  | 4.95E-10       | 4.4   |  | SSE                |
| MAX X/Q                              | 3.31E-06   |           |            |          |           |                | TOTAL HOURS AROUND SITE: 307.8                            |  |                    |
| SRP 2.3.4 300.                       | 2.12E-06   | 7.98E-07  | 4.89E-07   | 1.69E-07 | 3.68E-08  | 5.69E-09       |   |  |                    |
| SITE LIMIT                           | 2.12E-06   | 7.98E-07  | 4.89E-07   | 1.69E-07 | 3.68E-08  | 5.69E-09       |   |  |                    |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

DOWNWIND DISTANCE FUMIGATION

| SECTOR (METERS) | X/Q      |
|-----------------|----------|
| S 300.          | 1.22E-04 |
| SSW 300.        | 1.22E-04 |
| SW 300.         | 1.22E-04 |
| WSW 300.        | 1.22E-04 |
| W 300.          | 1.22E-04 |
| WNW 300.        | 1.22E-04 |
| NW 300.         | 1.22E-04 |
| NNW 300.        | 1.22E-04 |
| N 300.          | 1.22E-04 |
| NNE 300.        | 1.22E-04 |
| NE 300.         | 1.22E-04 |
| ENE 300.        | 1.22E-04 |
| E 300.          | 1.22E-04 |
| ESE 300.        | 1.22E-04 |

## ATTACHMENT C

|     |      |          |
|-----|------|----------|
| SE  | 300. | 1.22E-04 |
| SSE | 300. | 1.22E-04 |

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)<br>VERSUS AVERAGING TIME |           |            |          |           |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |  | DOWNWIND<br>SECTOR |
|--------------------------------------|--|-----------|------------|----------|-----------|--------------------------|---|--|--------------------|
|                                      | 0-2 HOURS  | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE           | IN SECTOR                                       |  |                    |
| S 500.                               | 1.67E-06   | 5.31E-07  | 2.99E-07   | 8.62E-08 | 1.45E-08  | 1.63E-09                 | 7.4   |  | S                  |
| SSW 500.                             | 1.71E-06   | 6.22E-07  | 3.76E-07   | 1.26E-07 | 2.61E-08  | 3.81E-09                 | 154.3   |  | SSW                |
| SW 500.                              | 2.21E-06   | 8.63E-07  | 5.40E-07   | 1.95E-07 | 4.52E-08  | 7.56E-09                 | 17.7  |  | SW                 |
| WSW 500.                             | 2.54E-06   | 1.05E-06  | 6.74E-07   | 2.58E-07 | 6.50E-08  | 1.20E-08                 | 24.9  |  | WSW                |
| W 500.                               | 3.31E-06   | 1.45E-06  | 9.61E-07   | 3.93E-07 | 1.09E-07  | 2.26E-08                 | 43.7  |  | W                  |
| WNW 500.                             | 2.49E-06   | 1.04E-06  | 6.69E-07   | 2.58E-07 | 6.61E-08  | 1.24E-08                 | 22.4  |  | WNW                |
| NW 500.                              | 1.70E-06   | 6.28E-07  | 3.83E-07   | 1.30E-07 | 2.78E-08  | 4.19E-09                 | 6.6   |  | NW                 |
| NNW 500.                             | 1.37E-06   | 3.94E-07  | 2.12E-07   | 5.50E-08 | 7.95E-09  | 7.45E-10                 | 3.6   |  | NNW                |
| N 500.                               | 1.55E-06   | 5.27E-07  | 3.08E-07   | 9.55E-08 | 1.78E-08  | 2.28E-09                 | 3.9   |  | N                  |
| NNE 500.                             | 1.30E-06   | 4.25E-07  | 2.43E-07   | 7.24E-08 | 1.27E-08  | 1.52E-09                 | 2.5   |  | NNE                |
| NE 500.                              | 1.28E-06   | 4.09E-07  | 2.31E-07   | 6.70E-08 | 1.13E-08  | 1.29E-09                 | 3.2   |  | NE                 |
| ENE 500.                             | 1.20E-06   | 3.85E-07  | 2.18E-07   | 6.37E-08 | 1.09E-08  | 1.25E-09                 | 2.0   |  | ENE                |
| E 500.                               | 1.42E-06   | 5.24E-07  | 3.18E-07   | 1.08E-07 | 2.29E-08  | 3.44E-09                 | 3.4   |  | E                  |
| ESE 500.                             | 1.19E-06   | 4.18E-07  | 2.48E-07   | 7.98E-08 | 1.57E-08  | 2.14E-09                 | 4.7   |  | ESE                |
| SE 500.                              | 1.28E-06   | 3.62E-07  | 1.93E-07   | 4.90E-08 | 6.87E-09  | 6.20E-10                 | 3.0   |  | SE                 |
| SSE 500.                             | 1.64E-06   | 5.64E-07  | 3.31E-07   | 1.04E-07 | 1.98E-08  | 2.60E-09                 | 4.4   |  | SSE                |
| MAX X/Q                              | 3.31E-06   |           |            |          |           | TOTAL HOURS AROUND SITE: | 307.8   |  |                    |
| SRP 2.3.4 500.                       | 2.12E-06   | 1.00E-06  | 6.88E-07   | 3.05E-07 | 9.46E-08  | 2.26E-08                 |   |  |                    |
| SITE LIMIT                           | 2.12E-06   | 1.00E-06  | 6.88E-07   | 3.05E-07 | 9.46E-08  | 2.26E-08                 |   |  |                    |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND DISTANCE FUMIGATION<br>SECTOR (METERS) | X/Q      |
|---|----------|
| S 500.  | 7.68E-05 |
| SSW 500.  | 7.68E-05 |
| SW 500.   | 7.68E-05 |
| WSW 500.  | 7.68E-05 |
| W 500.  | 7.68E-05 |
| WNW 500.  | 7.68E-05 |
| NW 500.   | 7.68E-05 |
| NNW 500.  | 7.68E-05 |
| N 500.  | 7.68E-05 |
| NNE 500.  | 7.68E-05 |
| NE 500.   | 7.68E-05 |
| ENE 500.  | 7.68E-05 |
| E 500.  | 7.68E-05 |
| ESE 500.  | 7.68E-05 |



# ATTACHMENT C

SE 500. 7.68E-05  
 SSE 500. 7.68E-05

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
 CHECK THE REASONABLENESS OF THE ENVELOPES  
 COMPUTED FOR THE .0-2 HOUR VALUES. FOR ANY  
 FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

## Off-Gas Stack to Control Room Intake (750 and 1000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
 Peach Bottom Stack Release  
 97.5 meters 10.1-96.3 meters

Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

| 11    | 1    |       |      |     |     |     |     |     |     |     |     |     |     |     |     |  |
|-------|------|-------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--|
| 2584. | 54.3 | 131.4 | 97.5 |     |     |     |     |     |     |     |     |     |     |     |     |  |
| 0     | 0    | 0     | 2    | 6   | 5   | 0   |     |     |     |     |     |     |     |     |     |  |
| 0.    | 0.   | 0.    | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 0.    | 0.   | 0.    | 0.   | 3.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 0.    | 2.   | 10.   | 10.  | 15. | 3.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 5.    | 6.   | 10.   | 23.  | 59. | 25. | 2.  | 0.  | 0.  | 1.  | 2.  | 0.  | 0.  | 0.  | 0.  | 1.  |  |
| 1.    | 3.   | 11.   | 18.  | 43. | 40. | 10. | 4.  | 2.  | 2.  | 2.  | 0.  | 1.  | 3.  | 0.  | 0.  |  |
| 0.    | 6.   | 10.   | 11.  | 13. | 17. | 9.  | 0.  | 7.  | 4.  | 3.  | 3.  | 2.  | 3.  | 0.  | 5.  |  |
| 0.    | 1.   | 2.    | 13.  | 8.  | 3.  | 9.  | 0.  | 4.  | 3.  | 0.  | 6.  | 13. | 7.  | 3.  | 4.  |  |
| 2.    | 4.   | 9.    | 11.  | 2.  | 3.  | 7.  | 0.  | 6.  | 2.  | 2.  | 1.  | 14. | 5.  | 2.  | 14. |  |
| 1.    | 2.   | 0.    | 1.   | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 2.  | 10. | 2.  | 0.  | 1.  |  |
| 1.    | 0.   | 0.    | 0.   | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 6.  | 5.  | 1.  | 1.  |  |
| 0.    | 1.   | 1.    | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 0.    | 1.   | 1.    | 9.   | 5.  | 0.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 1.    | 7.   | 5.    | 8.   | 21. | 5.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 1.  | 0.  |  |
| 12.   | 15.  | 9.    | 11.  | 34. | 19. | 6.  | 1.  | 1.  | 4.  | 3.  | 1.  | 3.  | 1.  | 2.  | 3.  |  |
| 1.    | 11.  | 11.   | 18.  | 6.  | 21. | 11. | 4.  | 4.  | 4.  | 4.  | 2.  | 3.  | 5.  | 1.  | 7.  |  |
| 2.    | 5.   | 4.    | 2.   | 5.  | 9.  | 13. | 5.  | 17. | 9.  | 6.  | 5.  | 13. | 2.  | 1.  | 12. |  |
| 3.    | 0.   | 3.    | 1.   | 3.  | 0.  | 9.  | 6.  | 14. | 5.  | 6.  | 7.  | 10. | 8.  | 3.  | 15. |  |
| 8.    | 2.   | 1.    | 1.   | 0.  | 2.  | 5.  | 3.  | 22. | 5.  | 3.  | 13. | 21. | 15. | 6.  | 20. |  |
| 1.    | 3.   | 0.    | 0.   | 0.  | 1.  | 1.  | 1.  | 6.  | 1.  | 1.  | 2.  | 11. | 12. | 5.  | 6.  |  |
| 0.    | 0.   | 1.    | 0.   | 0.  | 0.  | 0.  | 0.  | 1.  | 1.  | 0.  | 1.  | 7.  | 10. | 0.  | 0.  |  |
| 0.    | 2.   | 2.    | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 0.    | 3.   | 10.   | 14.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  |  |
| 4.    | 7.   | 11.   | 16.  | 31. | 17. | 2.  | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  |  |
| 18.   | 14.  | 15.   | 17.  | 17. | 40. | 6.  | 4.  | 11. | 4.  | 7.  | 3.  | 2.  | 2.  | 3.  | 16. |  |
| 26.   | 12.  | 8.    | 11.  | 10. | 21. | 26. | 13. | 20. | 13. | 9.  | 4.  | 16. | 6.  | 8.  | 35. |  |
| 21.   | 6.   | 3.    | 8.   | 5.  | 11. | 31. | 10. | 40. | 14. | 15. | 14. | 23. | 13. | 9.  | 45. |  |
| 8.    | 8.   | 0.    | 3.   | 2.  | 3.  | 15. | 12. | 37. | 17. | 11. | 15. | 11. | 21. | 18. | 43. |  |
| 14.   | 2.   | 4.    | 2.   | 2.  | 3.  | 7.  | 5.  | 48. | 18. | 16. | 24. | 48. | 45. | 26. | 74. |  |
| 4.    | 1.   | 0.    | 0.   | 1.  | 2.  | 0.  | 1.  | 10. | 0.  | 3.  | 3.  | 29. | 27. | 22. | 14. |  |
| 1.    | 3.   | 0.    | 0.   | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 2.  | 2.  | 16. | 33. | 12. | 4.  |  |

# ATTACHMENT C

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# ATTACHMENT C

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USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T 6 11 42771 1
7 0.500 2584.000 54.300 131.400 97.500
8 0.000 0.000 0.000 2.000 6.000 5.000 0.000
9 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 0.000 0.000 0.000 0.000 0.000 3.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 0.000 2.000 10.000 10.000 15.000 3.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 5.000 6.000 10.000 23.000 59.000 25.000 2.000 0.000 0.000 1.000 2.000 0.000 0.000 0.000 0.000 1.000
9 1.000 3.000 11.000 18.000 43.000 40.000 10.000 4.000 2.000 2.000 2.000 0.000 1.000 3.000 0.000 0.000
9 0.000 6.000 10.000 11.000 13.000 17.000 9.000 0.000 7.000 4.000 3.000 3.000 3.000 2.000 3.000 5.000
9 0.000 1.000 2.000 13.000 8.000 3.000 9.000 0.000 4.000 3.000 0.000 6.000 13.000 7.000 3.000 4.000
9 2.000 4.000 9.000 11.000 2.000 3.000 7.000 0.000 6.000 2.000 2.000 1.000 14.000 5.000 2.000 14.000
9 1.000 2.000 0.000 1.000 0.000 1.000 0.000 0.000 0.000 0.000 0.000 2.000 10.000 2.000 0.000 1.000
9 1.000 0.000 0.000 0.000 0.000 1.000 0.000 0.000 0.000 0.000 0.000 1.000 6.000 5.000 1.000 1.000
9 0.000 1.000 1.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 0.000 1.000 1.000 9.000 5.000 0.000 2.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 1.000 7.000 5.000 8.000 21.000 5.000 1.000 0.000 0.000 0.000 0.000 1.000 0.000 1.000 0.000 0.000
9 12.000 15.000 9.000 11.000 34.000 19.000 6.000 1.000 1.000 4.000 3.000 1.000 3.000 1.000 2.000 3.000
9 1.000 11.000 11.000 18.000 6.000 21.000 11.000 4.000 4.000 4.000 4.000 2.000 3.000 5.000 1.000 7.000
9 2.000 5.000 4.000 2.000 5.000 9.000 13.000 5.000 17.000 9.000 6.000 5.000 13.000 2.000 1.000 12.000
9 3.000 0.000 3.000 1.000 3.000 0.000 9.000 6.000 14.000 5.000 6.000 7.000 10.000 8.000 3.000 15.000
9 8.000 2.000 1.000 1.000 0.000 2.000 5.000 3.000 22.000 5.000 3.000 13.000 21.000 15.000 6.000 20.000
9 1.000 3.000 0.000 0.000 0.000 1.000 1.000 1.000 6.000 1.000 1.000 2.000 11.000 12.000 5.000 6.000
9 0.000 0.000 1.000 0.000 0.000 0.000 0.000 0.000 1.000 1.000 0.000 1.000 7.000 10.000 0.000 0.000
9 0.000 2.000 2.000 1.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 0.000 3.000 10.000 14.000 1.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 4.000 7.000 11.000 16.000 31.000 17.000 2.000 0.000 1.000 0.000 0.000 0.000 0.000 0.000 0.000 1.000
9 18.000 14.000 15.000 17.000 17.000 40.000 6.000 4.000 11.000 4.000 7.000 3.000 2.000 2.000 3.000 16.000
9 26.000 12.000 8.000 11.000 10.000 21.000 26.000 13.000 20.000 13.000 9.000 4.000 16.000 6.000 8.000 35.000
9 21.000 6.000 3.000 8.000 5.000 11.000 31.000 10.000 40.000 14.000 15.000 14.000 23.000 13.000 9.000 45.000
9 8.000 8.000 0.000 3.000 2.000 3.000 15.000 12.000 37.000 17.000 11.000 15.000 11.000 21.000 18.000 43.000
9 14.000 2.000 4.000 2.000 2.000 3.000 7.000 5.000 48.000 18.000 16.000 24.000 48.000 45.000 26.000 74.000
9 4.000 1.000 0.000 0.000 1.000 2.000 0.000 1.000 10.000 0.000 3.000 3.000 29.000 27.000 22.000 14.000
9 1.000 3.000 0.000 0.000 0.000 0.000 0.000 0.000 1.000 0.000 2.000 2.000 16.000 33.000 12.000 4.000
9 18.000 18.000 28.000 26.000 28.000 20.000 14.000 13.000 12.000 6.000 9.000 6.000 8.000 19.000 8.000 10.000
9 41.000 40.000 80.000 93.000 87.000 66.000 31.000 22.000 29.000 17.000 23.000 9.000 18.000 19.000 28.000 40.000
9 67.000 53.000 78.000 99.000 130.000 77.000 54.000 50.000 39.000 31.000 28.000 24.000 30.000 19.000 40.000 50.000
9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
9 233.000 99.000 80.000 54.000 103.000 102.000 129.000 147.000 274.000 132.000 80.000 103.000 142.000 196.000 332.000 406.000
9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
```

## ATTACHMENT C

|       |         |         |        |         |         |         |         |         |         |         |         |         |         |         |         |         |       |       |       |       |       |       |
|-------|---------|---------|--------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-------|-------|-------|-------|-------|-------|
| 9     | 21.000  | 15.000  | 15.000 | 20.000  | 24.000  | 17.000  | 26.000  | 16.000  | 26.000  | 16.000  | 17.000  | 19.000  | 30.000  | 17.000  | 23.000  | 11.000  |       |       |       |       |       |       |
| 9     | 39.000  | 29.000  | 21.000 | 41.000  | 36.000  | 43.000  | 35.000  | 43.000  | 44.000  | 40.000  | 42.000  | 35.000  | 24.000  | 19.000  | 16.000  | 23.000  |       |       |       |       |       |       |
| 9     | 50.000  | 43.000  | 35.000 | 51.000  | 65.000  | 48.000  | 90.000  | 69.000  | 60.000  | 65.000  | 63.000  | 36.000  | 42.000  | 23.000  | 30.000  | 36.000  |       |       |       |       |       |       |
| 9     | 137.000 | 92.000  | 91.000 | 138.000 | 168.000 | 113.000 | 186.000 | 176.000 | 263.000 | 196.000 | 164.000 | 111.000 | 102.000 | 82.000  | 112.000 | 115.000 |       |       |       |       |       |       |
| 9     | 177.000 | 131.000 | 95.000 | 87.000  | 123.000 | 134.000 | 205.000 | 234.000 | 432.000 | 273.000 | 191.000 | 116.000 | 120.000 | 116.000 | 154.000 | 200.000 |       |       |       |       |       |       |
| 9     | 180.000 | 79.000  | 69.000 | 40.000  | 68.000  | 116.000 | 152.000 | 195.000 | 423.000 | 257.000 | 165.000 | 149.000 | 193.000 | 161.000 | 255.000 | 213.000 |       |       |       |       |       |       |
| 9     | 102.000 | 30.000  | 25.000 | 9.000   | 37.000  | 61.000  | 88.000  | 142.000 | 284.000 | 182.000 | 99.000  | 157.000 | 213.000 | 232.000 | 277.000 | 276.000 |       |       |       |       |       |       |
| 9     | 110.000 | 26.000  | 17.000 | 6.000   | 39.000  | 46.000  | 69.000  | 103.000 | 367.000 | 150.000 | 159.000 | 177.000 | 417.000 | 441.000 | 493.000 | 336.000 |       |       |       |       |       |       |
| 9     | 24.000  | 10.000  | 3.000  | 4.000   | 11.000  | 20.000  | 16.000  | 11.000  | 72.000  | 19.000  | 27.000  | 38.000  | 88.000  | 124.000 | 101.000 | 48.000  |       |       |       |       |       |       |
| 9     | 8.000   | 1.000   | 6.000  | 1.000   | 21.000  | 3.000   | 9.000   | 1.000   | 9.000   | 2.000   | 2.000   | 2.000   | 10.000  | 12.000  | 10.000  | 14.000  |       |       |       |       |       |       |
| 9     | 16.000  | 7.000   | 13.000 | 10.000  | 11.000  | 12.000  | 10.000  | 12.000  | 12.000  | 12.000  | 15.000  | 15.000  | 14.000  | 13.000  | 13.000  | 7.000   |       |       |       |       |       |       |
| 9     | 10.000  | 12.000  | 9.000  | 16.000  | 20.000  | 11.000  | 18.000  | 20.000  | 11.000  | 20.000  | 17.000  | 18.000  | 16.000  | 15.000  | 13.000  | 15.000  |       |       |       |       |       |       |
| 9     | 26.000  | 13.000  | 14.000 | 10.000  | 13.000  | 18.000  | 27.000  | 34.000  | 33.000  | 29.000  | 27.000  | 36.000  | 22.000  | 18.000  | 18.000  | 20.000  |       |       |       |       |       |       |
| 9     | 53.000  | 19.000  | 18.000 | 17.000  | 15.000  | 28.000  | 43.000  | 44.000  | 75.000  | 89.000  | 99.000  | 64.000  | 43.000  | 39.000  | 60.000  | 59.000  |       |       |       |       |       |       |
| 9     | 62.000  | 19.000  | 7.000  | 10.000  | 14.000  | 18.000  | 37.000  | 32.000  | 89.000  | 72.000  | 105.000 | 77.000  | 88.000  | 49.000  | 69.000  | 53.000  |       |       |       |       |       |       |
| 9     | 29.000  | 9.000   | 6.000  | 0.000   | 5.000   | 11.000  | 18.000  | 46.000  | 46.000  | 46.000  | 66.000  | 85.000  | 85.000  | 74.000  | 87.000  | 57.000  |       |       |       |       |       |       |
| 9     | 12.000  | 4.000   | 3.000  | 0.000   | 0.000   | 2.000   | 7.000   | 15.000  | 40.000  | 19.000  | 31.000  | 57.000  | 85.000  | 55.000  | 67.000  | 47.000  |       |       |       |       |       |       |
| 9     | 2.000   | 0.000   | 0.000  | 0.000   | 0.000   | 1.000   | 4.000   | 6.000   | 24.000  | 20.000  | 23.000  | 80.000  | 128.000 | 104.000 | 61.000  | 19.000  |       |       |       |       |       |       |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 3.000   | 1.000   | 21.000  | 23.000  | 23.000  | 0.000   | 5.000   |       |       |       |       |       |       |
| 9     | 1.000   | 0.000   | 0.000  | 0.000   | 4.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 1.000   | 0.000   | 0.000   | 0.000   |       |       |       |       |       |       |
| 9     | 7.000   | 9.000   | 6.000  | 6.000   | 8.000   | 2.000   | 1.000   | 7.000   | 8.000   | 8.000   | 1.000   | 10.000  | 8.000   | 8.000   | 7.000   | 10.000  |       |       |       |       |       |       |
| 9     | 4.000   | 5.000   | 5.000  | 4.000   | 5.000   | 3.000   | 3.000   | 2.000   | 9.000   | 1.000   | 5.000   | 8.000   | 5.000   | 6.000   | 6.000   | 9.000   |       |       |       |       |       |       |
| 9     | 4.000   | 9.000   | 5.000  | 4.000   | 5.000   | 1.000   | 11.000  | 4.000   | 8.000   | 9.000   | 6.000   | 8.000   | 7.000   | 8.000   | 11.000  | 12.000  |       |       |       |       |       |       |
| 9     | 35.000  | 8.000   | 15.000 | 13.000  | 7.000   | 5.000   | 12.000  | 5.000   | 22.000  | 19.000  | 22.000  | 19.000  | 25.000  | 22.000  | 44.000  | 34.000  |       |       |       |       |       |       |
| 9     | 17.000  | 3.000   | 5.000  | 4.000   | 3.000   | 1.000   | 8.000   | 3.000   | 6.000   | 16.000  | 36.000  | 25.000  | 28.000  | 26.000  | 53.000  | 62.000  |       |       |       |       |       |       |
| 9     | 7.000   | 4.000   | 1.000  | 0.000   | 0.000   | 1.000   | 4.000   | 3.000   | 8.000   | 4.000   | 16.000  | 40.000  | 27.000  | 20.000  | 41.000  | 29.000  |       |       |       |       |       |       |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 2.000   | 1.000   | 1.000   | 5.000   | 10.000  | 23.000  | 37.000  | 10.000  | 17.000  | 8.000   |       |       |       |       |       |       |
| 9     | 1.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 1.000   | 0.000   | 5.000   | 14.000  | 24.000  | 32.000  | 5.000   | 4.000   |       |       |       |       |       |       |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 2.000   | 1.000   | 2.000   | 0.000   | 0.000   | 0.000   |       |       |       |       |       |       |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   |       |       |       |       |       |       |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   |       |       |       |       |       |       |
| 2.350 | 3.470   | 4.590   | 6.820  | 9.060   | 11.300  | 13.530  | 18.010  | 22.370  | 55.000  | 0.000   | 0.000   | 0.000   | 11      | 750.    | 750.    | 750.    | 750.  | 750.  | 750.  | 101.  | 0.500 |       |
| 750.  | 750.    | 750.    | 750.   | 750.    | 750.    | 750.    | 750.    | 750.    | 750.    | 11      | 1000.   | 1000.   | 1000.   | 1000.   | 1000.   | 1000.   | 1000. | 1000. | 1000. | 1000. | 1000. | 1000. |
| 1000. | 1000.   | 1000.   | 1000.  | 1000.   | 1000.   | 12      | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0   | 1.0   | 1.0   | 1.0   | 1.0   | 1.0   |
| 1.0   | 1.0     | 1.0     |        |         |         |         |         |         |         |         |         |         |         |         |         |         |       |       |       |       |       |       |
| 12    | 1.0     | 1.0     | 1.0    | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0   | 1.0   | 13    | 500.  | 500.  |       |
| 500.  | 500.    | 500.    | 500.   | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    |         |         |         |       |       |       |       |       |       |
| 14    | 0.      | 0.      | 0.     | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.    |       |       |       |       |       |

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)<br>VERSUS AVERAGING TIME |           |            |          |                          |                | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED IN SECTOR |  | DOWNWIND<br>SECTOR |
|--------------------------------------|--|-----------|------------|----------|--------------------------|----------------|---|--|--------------------|
|                                      | 0-2 HOURS  | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE |   |  |                    |
| S 750.                               | 1.66E-06   | 5.73E-07  | 3.37E-07   | 1.06E-07 | 2.02E-08                 | 2.66E-09       | 13.0  |  | S                  |
| SSW 750.                             | 1.66E-06   | 6.37E-07  | 3.95E-07   | 1.40E-07 | 3.15E-08                 | 5.09E-09       | 220.3   |  | SSW                |
| SW 750.                              | 2.07E-06   | 7.99E-07  | 4.96E-07   | 1.76E-07 | 3.99E-08                 | 6.48E-09       | 26.1  |  | SW                 |
| WSW 750.                             | 2.32E-06   | 9.45E-07  | 6.03E-07   | 2.28E-07 | 5.62E-08                 | 1.01E-08       | 32.8  |  | WSW                |
| W 750.                               | 2.60E-06   | 1.13E-06  | 7.45E-07   | 3.02E-07 | 8.26E-08                 | 1.69E-08       | 43.7  |  | W                  |
| WNW 750.                             | 2.20E-06   | 9.01E-07  | 5.76E-07   | 2.19E-07 | 5.44E-08                 | 9.90E-09       | 25.6  |  | WNW                |
| NW 750.                              | 1.62E-06   | 6.16E-07  | 3.79E-07   | 1.33E-07 | 2.93E-08                 | 4.62E-09       | 10.2  |  | NW                 |
| NNW 750.                             | 1.37E-06   | 4.32E-07  | 2.43E-07   | 6.98E-08 | 1.16E-08                 | 1.30E-09       | 5.9   |  | NNW                |
| N 750.                               | 1.51E-06   | 5.60E-07  | 3.42E-07   | 1.17E-07 | 2.51E-08                 | 3.81E-09       | 7.6   |  | N                  |
| NNE 750.                             | 1.28E-06   | 4.44E-07  | 2.62E-07   | 8.29E-08 | 1.59E-08                 | 2.11E-09       | 4.7   |  | NNE                |
| NE 750.                              | 1.27E-06   | 4.30E-07  | 2.50E-07   | 7.69E-08 | 1.42E-08                 | 1.79E-09       | 6.3   |  | NE                 |
| ENE 750.                             | 1.19E-06   | 4.05E-07  | 2.37E-07   | 7.36E-08 | 1.38E-08                 | 1.77E-09       | 4.5   |  | ENE                |
| E 750.                               | 1.33E-06   | 5.13E-07  | 3.18E-07   | 1.13E-07 | 2.55E-08                 | 4.14E-09       | 6.7   |  | E                  |
| ESE 750.                             | 1.16E-06   | 4.28E-07  | 2.60E-07   | 8.81E-08 | 1.86E-08                 | 2.78E-09       | 7.1   |  | ESE                |
| SE 750.                              | 1.27E-06   | 4.06E-07  | 2.30E-07   | 6.67E-08 | 1.13E-08                 | 1.29E-09       | 5.6   |  | SE                 |
| SSE 750.                             | 1.58E-06   | 5.95E-07  | 3.65E-07   | 1.27E-07 | 2.78E-08                 | 4.34E-09       | 9.9   |  | SSE                |
| MAX X/Q                              | 2.60E-06   |           |            |          | TOTAL HOURS AROUND SITE: | 430.1          |   |  |                    |
| SRP 2.3.4 750.                       | 2.00E-06   | 9.08E-07  | 6.12E-07   | 2.60E-07 | 7.61E-08                 | 1.69E-08       |   |  |                    |
| SITE LIMIT                           | 2.00E-06   | 9.08E-07  | 6.12E-07   | 2.60E-07 | 7.61E-08                 | 1.69E-08       |   |  |                    |

0.5 PERCENT X/Q TO AN INDIVIDUAL IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND DISTANCE FUMIGATION<br>SECTOR (METERS) | X/Q      |
|---|----------|
| S 750.  | 5.32E-05 |
| SSW 750.  | 5.32E-05 |
| SW 750.   | 5.32E-05 |
| WSW 750.  | 5.32E-05 |
| W 750.  | 5.32E-05 |
| WNW 750.  | 5.32E-05 |
| NW 750.   | 5.32E-05 |
| NNW 750.  | 5.32E-05 |
| N 750.  | 5.32E-05 |
| NNE 750.  | 5.32E-05 |
| NE 750.   | 5.32E-05 |
| ENE 750.  | 5.32E-05 |
| E 750.  | 5.32E-05 |
| ESE 750.  | 5.32E-05 |

## ATTACHMENT C

|     |      |          |
|-----|------|----------|
| SE  | 750. | 5.32E-05 |
| SSE | 750. | 5.32E-05 |

**\*\*NOTE\*\***: VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)<br>VERSUS AVERAGING TIME |           |            |          |           |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED IN SECTOR |  | DOWNWIND<br>SECTOR |
|--------------------------------------|--|-----------|------------|----------|-----------|--------------------------|---|--|--------------------|
|                                      | 0-2 HOURS  | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE           |   |  |                    |
| S 1000.                              | 1.64E-06   | 5.99E-07  | 3.62E-07   | 1.21E-07 | 2.51E-08  | 3.67E-09                 | 16.8  |  | S                  |
| SSW 1000.                            | 1.61E-06   | 6.29E-07  | 3.94E-07   | 1.42E-07 | 3.31E-08  | 5.54E-09                 | 263.5   |  | SSW                |
| SW 1000.                             | 1.95E-06   | 7.52E-07  | 4.67E-07   | 1.66E-07 | 3.76E-08  | 6.11E-09                 | 30.5  |  | SW                 |
| WSW 1000.                            | 2.19E-06   | 8.86E-07  | 5.63E-07   | 2.11E-07 | 5.14E-08  | 9.15E-09                 | 37.7  |  | WSW                |
| W 1000.                              | 2.32E-06   | 9.89E-07  | 6.45E-07   | 2.55E-07 | 6.75E-08  | 1.33E-08                 | 43.7  |  | W                  |
| WNW 1000.                            | 2.05E-06   | 8.31E-07  | 5.30E-07   | 1.99E-07 | 4.89E-08  | 8.78E-09                 | 32.8  |  | WNW                |
| NW 1000.                             | 1.58E-06   | 6.09E-07  | 3.78E-07   | 1.34E-07 | 3.02E-08  | 4.89E-09                 | 12.6  |  | NW                 |
| NNW 1000.                            | 1.35E-06   | 4.51E-07  | 2.60E-07   | 7.88E-08 | 1.42E-08  | 1.74E-09                 | 7.9   |  | NNW                |
| N 1000.                              | 1.50E-06   | 5.86E-07  | 3.67E-07   | 1.33E-07 | 3.08E-08  | 5.15E-09                 | 10.3  |  | N                  |
| NNE 1000.                            | 1.27E-06   | 4.54E-07  | 2.72E-07   | 8.94E-08 | 1.81E-08  | 2.57E-09                 | 6.6   |  | NNE                |
| NE 1000.                             | 1.26E-06   | 4.41E-07  | 2.62E-07   | 8.40E-08 | 1.64E-08  | 2.24E-09                 | 8.2   |  | NE                 |
| ENE 1000.                            | 1.18E-06   | 4.15E-07  | 2.46E-07   | 7.96E-08 | 1.57E-08  | 2.16E-09                 | 6.1   |  | ENE                |
| E 1000.                              | 1.31E-06   | 5.16E-07  | 3.24E-07   | 1.18E-07 | 2.75E-08  | 4.66E-09                 | 8.8   |  | E                  |
| ESE 1000.                            | 1.13E-06   | 4.34E-07  | 2.69E-07   | 9.49E-08 | 2.13E-08  | 3.42E-09                 | 9.0   |  | ESE                |
| SE 1000.                             | 1.26E-06   | 4.37E-07  | 2.57E-07   | 8.10E-08 | 1.55E-08  | 2.04E-09                 | 7.7   |  | SE                 |
| SSE 1000.                            | 1.57E-06   | 6.31E-07  | 3.99E-07   | 1.48E-07 | 3.56E-08  | 6.23E-09                 | 13.4  |  | SSE                |
| MAX X/Q                              | 2.32E-06   |           |            |          |           | TOTAL HOURS AROUND SITE: | 515.8   |  |                    |
| SRP 2.3.4 1000.                      | 1.91E-06   | 8.41E-07  | 5.57E-07   | 2.28E-07 | 6.35E-08  | 1.33E-08                 |   |  |                    |
| SITE LIMIT                           | 1.91E-06   | 8.41E-07  | 5.57E-07   | 2.28E-07 | 6.35E-08  | 1.33E-08                 |   |  |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

DOWNWIND DISTANCE FUMIGATION

| SECTOR (METERS) | X/Q      |
|-----------------|----------|
| S 1000.         | 4.11E-05 |
| SSW 1000.       | 4.11E-05 |
| SW 1000.        | 4.11E-05 |
| WSW 1000.       | 4.11E-05 |
| W 1000.         | 4.11E-05 |
| WNW 1000.       | 4.11E-05 |
| NW 1000.        | 4.11E-05 |
| NNW 1000.       | 4.11E-05 |
| N 1000.         | 4.11E-05 |
| NNE 1000.       | 4.11E-05 |
| NE 1000.        | 4.11E-05 |
| ENE 1000.       | 4.11E-05 |
| E 1000.         | 4.11E-05 |
| ESE 1000.       | 4.11E-05 |

# ATTACHMENT C

SE 1000. 4.11E-05  
 SSE 1000. 4.11E-05

**\*\*NOTE\*\***: VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
 CHECK THE REASONABLENESS OF THE ENVELOPES  
 COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
 FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

## Off-Gas Stack to Control Room Intake (1500 and 2000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
 Peach Bottom Stack Release  
 97.5 meters 10.1-96.3 meters

Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

| 11    | 1     |       |      |     |     |     |     |     |     |     |     |     |     |     |     |    |     |
|-------|-------|-------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|----|-----|
| 2584. | 54.31 | 131.4 | 97.5 |     |     |     |     |     |     |     |     |     |     |     |     |    |     |
| 0     | 0     | 0     | 2    | 6   | 5   | 0   |     |     |     |     |     |     |     |     |     |    |     |
| 0.    | 0.    | 0.    | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 0.    | 0.    | 0.    | 0.   | 3.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 0.    | 2.    | 10.   | 10.  | 15. | 3.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 5.    | 6.    | 10.   | 23.  | 59. | 25. | 2.  | 0.  | 0.  | 1.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 1.  |
| 1.    | 3.    | 11.   | 18.  | 43. | 40. | 10. | 4.  | 2.  | 2.  | 2.  | 0.  | 1.  | 3.  | 0.  | 0.  | 0. | 0.  |
| 0.    | 6.    | 10.   | 11.  | 13. | 17. | 9.  | 0.  | 7.  | 4.  | 3.  | 3.  | 2.  | 3.  | 0.  | 5.  | 0. | 5.  |
| 0.    | 1.    | 2.    | 13.  | 8.  | 3.  | 9.  | 0.  | 4.  | 3.  | 0.  | 6.  | 13. | 7.  | 3.  | 4.  | 0. | 4.  |
| 2.    | 4.    | 9.    | 11.  | 2.  | 3.  | 7.  | 0.  | 6.  | 2.  | 2.  | 1.  | 14. | 5.  | 2.  | 14. | 0. | 14. |
| 1.    | 2.    | 0.    | 1.   | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 2.  | 10. | 2.  | 0.  | 1.  | 0. | 1.  |
| 1.    | 0.    | 0.    | 0.   | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 6.  | 5.  | 1.  | 1.  | 0. | 1.  |
| 0.    | 1.    | 1.    | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 0.    | 1.    | 1.    | 9.   | 5.  | 0.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 1.    | 7.    | 5.    | 8.   | 21. | 5.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 1.  | 0.  | 0. | 0.  |
| 12.   | 15.   | 9.    | 11.  | 34. | 19. | 6.  | 1.  | 1.  | 4.  | 3.  | 1.  | 3.  | 1.  | 2.  | 3.  | 0. | 3.  |
| 1.    | 11.   | 11.   | 18.  | 6.  | 21. | 11. | 4.  | 4.  | 4.  | 4.  | 2.  | 3.  | 5.  | 1.  | 7.  | 0. | 7.  |
| 2.    | 5.    | 4.    | 2.   | 5.  | 9.  | 13. | 5.  | 17. | 9.  | 6.  | 5.  | 13. | 2.  | 1.  | 12. | 0. | 12. |
| 3.    | 0.    | 3.    | 1.   | 3.  | 0.  | 9.  | 6.  | 14. | 5.  | 6.  | 7.  | 10. | 8.  | 3.  | 15. | 0. | 15. |
| 8.    | 2.    | 1.    | 1.   | 0.  | 2.  | 5.  | 3.  | 22. | 5.  | 3.  | 13. | 21. | 15. | 6.  | 20. | 0. | 20. |
| 1.    | 3.    | 0.    | 0.   | 0.  | 1.  | 1.  | 1.  | 6.  | 1.  | 1.  | 2.  | 11. | 12. | 5.  | 6.  | 0. | 6.  |
| 0.    | 0.    | 1.    | 0.   | 0.  | 0.  | 0.  | 0.  | 1.  | 1.  | 0.  | 1.  | 7.  | 10. | 0.  | 0.  | 0. | 0.  |
| 0.    | 2.    | 2.    | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 0.    | 3.    | 10.   | 14.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0.  |
| 4.    | 7.    | 11.   | 16.  | 31. | 17. | 2.  | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 1.  |
| 18.   | 14.   | 15.   | 17.  | 17. | 40. | 6.  | 4.  | 11. | 4.  | 7.  | 3.  | 2.  | 2.  | 3.  | 16. | 0. | 16. |
| 26.   | 12.   | 8.    | 11.  | 10. | 21. | 26. | 13. | 20. | 13. | 9.  | 4.  | 16. | 6.  | 8.  | 35. | 0. | 35. |
| 21.   | 6.    | 3.    | 8.   | 5.  | 11. | 31. | 10. | 40. | 14. | 15. | 14. | 23. | 13. | 9.  | 45. | 0. | 45. |
| 8.    | 8.    | 0.    | 3.   | 2.  | 3.  | 15. | 12. | 37. | 17. | 11. | 15. | 11. | 21. | 18. | 43. | 0. | 43. |
| 14.   | 2.    | 4.    | 2.   | 2.  | 3.  | 7.  | 5.  | 48. | 18. | 16. | 24. | 48. | 45. | 26. | 74. | 0. | 74. |
| 4.    | 1.    | 0.    | 0.   | 1.  | 2.  | 0.  | 1.  | 10. | 0.  | 3.  | 3.  | 29. | 27. | 22. | 14. | 0. | 14. |
| 1.    | 3.    | 0.    | 0.   | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 2.  | 2.  | 16. | 33. | 12. | 4.  | 0. | 4.  |
| 18.   | 18.   | 28.   | 26.  | 28. | 20. | 14. | 13. | 12. | 6.  | 9.  | 6.  | 8.  | 19. | 8.  | 10. | 0. | 10. |



# ATTACHMENT C

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# ATTACHMENT C

Copyright (c) 1990 Ergo Computing, Inc. for Lahey

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T 6 11 42771 1
7 0.500 2584.000 54.300 131.400 97.500
8 0.000 0.000 0.000 2.000 6.000 5.000 0.000
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9 67.000 53.000 78.000 99.000 130.000 77.000 54.000 50.000 39.000 31.000 28.000 24.000 30.000 19.000 40.000 50.000
9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
9 233.000 99.000 80.000 54.000 103.000 102.000 129.000 147.000 274.000 132.000 80.000 103.000 142.000 196.000 332.000 406.000
9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
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# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)<br>VERSUS AVERAGING TIME |           |            |          |           |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |  | DOWNWIND<br>SECTOR |
|--------------------------------------|--|-----------|------------|----------|-----------|--------------------------|---|--|--------------------|
|                                      | 0-2 HOURS  | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE           | IN SECTOR                                       |  |                    |
| S 1500.                              | 1.68E-06   | 6.58E-07  | 4.12E-07   | 1.49E-07 | 3.46E-08  | 5.80E-09                 | 18.8  |  | S                  |
| SSW 1500.                            | 1.58E-06   | 6.28E-07  | 3.97E-07   | 1.46E-07 | 3.49E-08  | 6.04E-09                 | 298.3   |  | SSW                |
| SW 1500.                             | 1.89E-06   | 7.42E-07  | 4.64E-07   | 1.68E-07 | 3.90E-08  | 6.53E-09                 | 33.3  |  | SW                 |
| WSW 1500.                            | 2.09E-06   | 8.48E-07  | 5.40E-07   | 2.03E-07 | 4.98E-08  | 8.92E-09                 | 40.2  |  | WSW                |
| W 1500.                              | 2.18E-06   | 9.07E-07  | 5.85E-07   | 2.26E-07 | 5.77E-08  | 1.09E-08                 | 43.7  |  | W                  |
| WNW 1500.                            | 1.92E-06   | 7.84E-07  | 5.01E-07   | 1.90E-07 | 4.71E-08  | 8.56E-09                 | 32.6  |  | WNW                |
| NW 1500.                             | 1.55E-06   | 6.17E-07  | 3.89E-07   | 1.43E-07 | 3.40E-08  | 5.86E-09                 | 13.1  |  | NW                 |
| NNW 1500.                            | 1.36E-06   | 4.96E-07  | 3.00E-07   | 1.01E-07 | 2.10E-08  | 3.08E-09                 | 12.9  |  | NNW                |
| N 1500.                              | 1.48E-06   | 6.16E-07  | 3.98E-07   | 1.54E-07 | 3.93E-08  | 7.41E-09                 | 12.1  |  | N                  |
| NNE 1500.                            | 1.27E-06   | 4.81E-07  | 2.96E-07   | 1.03E-07 | 2.28E-08  | 3.59E-09                 | 9.4   |  | NNE                |
| NE 1500.                             | 1.26E-06   | 4.67E-07  | 2.84E-07   | 9.71E-08 | 2.07E-08  | 3.14E-09                 | 10.3  |  | NE                 |
| ENE 1500.                            | 1.17E-06   | 4.31E-07  | 2.62E-07   | 8.90E-08 | 1.89E-08  | 2.84E-09                 | 7.0   |  | ENE                |
| E 1500.                              | 1.27E-06   | 5.17E-07  | 3.29E-07   | 1.24E-07 | 3.05E-08  | 5.49E-09                 | 11.5  |  | E                  |
| ESE 1500.                            | 1.12E-06   | 4.56E-07  | 2.92E-07   | 1.10E-07 | 2.74E-08  | 4.97E-09                 | 10.2  |  | ESE                |
| SE 1500.                             | 1.29E-06   | 5.05E-07  | 3.17E-07   | 1.15E-07 | 2.68E-08  | 4.53E-09                 | 9.1   |  | SE                 |
| SSE 1500.                            | 1.56E-06   | 6.75E-07  | 4.43E-07   | 1.78E-07 | 4.82E-08  | 9.73E-09                 | 15.2  |  | SSE                |
| MAX X/Q                              | 2.18E-06   |           |            |          |           | TOTAL HOURS AROUND SITE: | 577.7   |  |                    |
| SRP 2.3.4 1500.                      | 1.89E-06   | 8.05E-07  | 5.26E-07   | 2.08E-07 | 5.52E-08  | 1.09E-08                 |   |  |                    |
| SITE LIMIT                           | 1.89E-06   | 8.05E-07  | 5.26E-07   | 2.08E-07 | 5.52E-08  | 1.09E-08                 |   |  |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

DOWNWIND DISTANCE FUMIGATION

| SECTOR (METERS) | X/Q      |
|-----------------|----------|
| S 1500.         | 2.85E-05 |
| SSW 1500.       | 2.85E-05 |
| SW 1500.        | 2.85E-05 |
| WSW 1500.       | 2.85E-05 |
| W 1500.         | 2.85E-05 |
| WNW 1500.       | 2.85E-05 |
| NW 1500.        | 2.85E-05 |
| NNW 1500.       | 2.85E-05 |
| N 1500.         | 2.85E-05 |
| NNE 1500.       | 2.85E-05 |
| NE 1500.        | 2.85E-05 |
| ENE 1500.       | 2.85E-05 |
| E 1500.         | 2.85E-05 |
| ESE 1500.       | 2.85E-05 |

## ATTACHMENT C

|     |       |          |
|-----|-------|----------|
| SE  | 1500. | 2.85E-05 |
| SSE | 1500. | 2.85E-05 |

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |                          |                | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |     | DOWNWIND<br>SECTOR |
|--------------------------------------|---|-----------|------------|----------|--------------------------|----------------|---|-----|--------------------|
|                                      | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE | IN SECTOR                                       |     |                    |
| S 2000.                              | 1.60E-06  | 6.79E-07  | 4.43E-07   | 1.75E-07 | 4.62E-08                 | 9.06E-09       | 21.5  | S   |                    |
| SSW 2000.                            | 1.49E-06  | 6.21E-07  | 4.01E-07   | 1.56E-07 | 4.00E-08                 | 7.58E-09       | 302.4   | SSW |                    |
| SW 2000.                             | 1.83E-06  | 7.50E-07  | 4.80E-07   | 1.83E-07 | 4.57E-08                 | 8.36E-09       | 34.7  | SW  |                    |
| WSW 2000.                            | 2.01E-06  | 8.45E-07  | 5.49E-07   | 2.15E-07 | 5.58E-08                 | 1.07E-08       | 41.6  | WSW |                    |
| W 2000.                              | 2.05E-06  | 8.86E-07  | 5.82E-07   | 2.34E-07 | 6.31E-08                 | 1.27E-08       | 43.7  | W   |                    |
| WNW 2000.                            | 1.82E-06  | 7.75E-07  | 5.05E-07   | 1.99E-07 | 5.24E-08                 | 1.02E-08       | 33.9  | WNW |                    |
| NW 2000.                             | 1.49E-06  | 6.32E-07  | 4.11E-07   | 1.62E-07 | 4.24E-08                 | 8.25E-09       | 13.5  | NW  |                    |
| NNW 2000.                            | 1.33E-06  | 5.38E-07  | 3.42E-07   | 1.28E-07 | 3.11E-08                 | 5.51E-09       | 14.0  | NNW |                    |
| N 2000.                              | 1.43E-06  | 6.35E-07  | 4.24E-07   | 1.76E-07 | 5.00E-08                 | 1.07E-08       | 16.2  | N   |                    |
| NNE 2000.                            | 1.22E-06  | 5.01E-07  | 3.20E-07   | 1.21E-07 | 3.01E-08                 | 5.48E-09       | 10.0  | NNE |                    |
| NE 2000.                             | 1.22E-06  | 4.85E-07  | 3.06E-07   | 1.13E-07 | 2.69E-08                 | 4.66E-09       | 10.9  | NE  |                    |
| ENE 2000.                            | 1.12E-06  | 4.42E-07  | 2.77E-07   | 1.01E-07 | 2.36E-08                 | 4.01E-09       | 7.7   | ENE |                    |
| E 2000.                              | 1.21E-06  | 5.19E-07  | 3.40E-07   | 1.35E-07 | 3.60E-08                 | 7.13E-09       | 12.3  | E   |                    |
| ESE 2000.                            | 1.07E-06  | 4.71E-07  | 3.13E-07   | 1.29E-07 | 3.61E-08                 | 7.60E-09       | 11.3  | ESE |                    |
| SE 2000.                             | 1.26E-06  | 5.56E-07  | 3.69E-07   | 1.51E-07 | 4.21E-08                 | 8.80E-09       | 12.8  | SE  |                    |
| SSE 2000.                            | 1.51E-06  | 6.99E-07  | 4.76E-07   | 2.07E-07 | 6.25E-08                 | 1.45E-08       | 18.7  | SSE |                    |
| MAX X/Q                              | 2.05E-06  |           |            |          | TOTAL HOURS AROUND SITE: | 605.2          |   |     |                    |
| SRP 2.3.4 2000.                      | 1.80E-06  | 8.11E-07  | 5.44E-07   | 2.29E-07 | 6.61E-08                 | 1.45E-08       |   |     |                    |
| SITE LIMIT                           | 1.80E-06  | 8.11E-07  | 5.44E-07   | 2.29E-07 | 6.61E-08                 | 1.45E-08       |   |     |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND DISTANCE FUMIGATION<br>SECTOR (METERS) | X/Q      |
|---|----------|
| S 2000.   | 2.20E-05 |
| SSW 2000.                                       | 2.20E-05 |
| SW 2000.  | 2.20E-05 |
| WSW 2000.                                       | 2.20E-05 |
| W 2000.   | 2.20E-05 |
| WNW 2000.                                       | 2.20E-05 |
| NW 2000.  | 2.20E-05 |
| NNW 2000.                                       | 2.20E-05 |
| N 2000.   | 2.20E-05 |
| NNE 2000.                                       | 2.20E-05 |
| NE 2000.  | 2.20E-05 |
| ENE 2000.                                       | 2.20E-05 |
| E 2000.   | 2.20E-05 |
| ESE 2000.                                       | 2.20E-05 |

# ATTACHMENT C

SE 2000. 2.20E-05  
SSE 2000. 2.20E-05

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

## Off-Gas Stack to Control Room Intake (3000 and 4000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
Peach Bottom Stack Release  
97.5 meters 10.1-96.3 meters

Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

| 11    | 1   |     |     |     |      |     |     |     |     |     |     |     |     |     |     |    |    |    |    |    |
|-------|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|----|----|----|----|----|
| 2584. | 54. | 31  | 13  | 1.4 | 97.5 |     |     |     |     |     |     |     |     |     |     |    |    |    |    |    |
| 0     | 0   | 0   | 2   | 6   | 5    | 0   |     |     |     |     |     |     |     |     |     |    |    |    |    |    |
| 0.    | 0.  | 0.  | 0.  | 0.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 0.  | 0.  | 0.  | 3.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 2.  | 10. | 10. | 15. | 3.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 5.    | 6.  | 10. | 23. | 59. | 25.  | 2.  | 0.  | 0.  | 1.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 1. | 0. |
| 1.    | 3.  | 11. | 18. | 43. | 40.  | 10. | 4.  | 2.  | 2.  | 2.  | 0.  | 1.  | 3.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 6.  | 10. | 11. | 13. | 17.  | 9.  | 0.  | 7.  | 4.  | 3.  | 3.  | 2.  | 3.  | 0.  | 5.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 1.  | 2.  | 13. | 8.  | 3.   | 9.  | 0.  | 4.  | 3.  | 0.  | 6.  | 13. | 7.  | 3.  | 4.  | 0. | 0. | 0. | 0. | 0. |
| 2.    | 4.  | 9.  | 11. | 2.  | 3.   | 7.  | 0.  | 6.  | 2.  | 2.  | 1.  | 14. | 5.  | 2.  | 14. | 0. | 0. | 0. | 0. | 0. |
| 1.    | 2.  | 0.  | 1.  | 0.  | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 2.  | 10. | 2.  | 0.  | 1.  | 0. | 0. | 0. | 0. | 0. |
| 1.    | 0.  | 0.  | 0.  | 0.  | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 6.  | 5.  | 1.  | 1.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 1.  | 1.  | 0.  | 0.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 1.  | 1.  | 9.  | 5.  | 0.   | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 1.    | 7.  | 5.  | 8.  | 21. | 5.   | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 1.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 12.   | 15. | 9.  | 11. | 34. | 19.  | 6.  | 1.  | 1.  | 4.  | 3.  | 1.  | 3.  | 1.  | 2.  | 3.  | 0. | 0. | 0. | 0. | 0. |
| 1.    | 11. | 11. | 18. | 6.  | 21.  | 11. | 4.  | 4.  | 4.  | 4.  | 2.  | 3.  | 5.  | 1.  | 7.  | 0. | 0. | 0. | 0. | 0. |
| 2.    | 5.  | 4.  | 2.  | 5.  | 9.   | 13. | 5.  | 17. | 9.  | 6.  | 5.  | 13. | 2.  | 1.  | 12. | 0. | 0. | 0. | 0. | 0. |
| 3.    | 0.  | 3.  | 1.  | 3.  | 0.   | 9.  | 6.  | 14. | 5.  | 6.  | 7.  | 10. | 8.  | 3.  | 15. | 0. | 0. | 0. | 0. | 0. |
| 8.    | 2.  | 1.  | 1.  | 0.  | 2.   | 5.  | 3.  | 22. | 5.  | 3.  | 13. | 21. | 15. | 6.  | 20. | 0. | 0. | 0. | 0. | 0. |
| 1.    | 3.  | 0.  | 0.  | 0.  | 1.   | 1.  | 1.  | 6.  | 1.  | 1.  | 2.  | 11. | 12. | 5.  | 6.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 0.  | 1.  | 0.  | 0.  | 0.   | 0.  | 0.  | 1.  | 1.  | 0.  | 1.  | 7.  | 10. | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 2.  | 2.  | 1.  | 0.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 0.    | 3.  | 10. | 14. | 1.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0. |
| 4.    | 7.  | 11. | 16. | 31. | 17.  | 2.  | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0. | 0. | 0. | 0. | 0. |
| 18.   | 14. | 15. | 17. | 17. | 40.  | 6.  | 4.  | 11. | 4.  | 7.  | 3.  | 2.  | 2.  | 3.  | 16. | 0. | 0. | 0. | 0. | 0. |
| 26.   | 12. | 8.  | 11. | 10. | 21.  | 26. | 13. | 20. | 13. | 9.  | 4.  | 16. | 6.  | 8.  | 35. | 0. | 0. | 0. | 0. | 0. |
| 21.   | 6.  | 3.  | 8.  | 5.  | 11.  | 31. | 10. | 40. | 14. | 15. | 14. | 23. | 13. | 9.  | 45. | 0. | 0. | 0. | 0. | 0. |
| 8.    | 8.  | 0.  | 3.  | 2.  | 3.   | 15. | 12. | 37. | 17. | 11. | 15. | 11. | 21. | 18. | 43. | 0. | 0. | 0. | 0. | 0. |
| 14.   | 2.  | 4.  | 2.  | 2.  | 3.   | 7.  | 5.  | 48. | 18. | 16. | 24. | 48. | 45. | 26. | 74. | 0. | 0. | 0. | 0. | 0. |
| 4.    | 1.  | 0.  | 0.  | 1.  | 2.   | 0.  | 1.  | 10. | 0.  | 3.  | 3.  | 29. | 27. | 22. | 14. | 0. | 0. | 0. | 0. | 0. |
| 1.    | 3.  | 0.  | 0.  | 0.  | 0.   | 0.  | 0.  | 1.  | 0.  | 2.  | 2.  | 16. | 33. | 12. | 4.  | 0. | 0. | 0. | 0. | 0. |
| 18.   | 18. | 28. | 26. | 28. | 20.  | 14. | 13. | 12. | 6.  | 9.  | 6.  | 8.  | 19. | 8.  | 10. | 0. | 0. | 0. | 0. | 0. |

# ATTACHMENT C

41. 40. 80. 93. 87. 66. 31. 22. 29. 17. 23. 9. 18. 19. 28. 40.  
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35. 8. 15. 13. 7. 5. 12. 5. 22. 19. 22. 19. 25. 22. 44. 34.  
17. 3. 5. 4. 3. 1. 8. 3. 6. 16. 36. 25. 28. 26. 53. 62.  
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# ATTACHMENT C

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USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T 6 11 42771 1
7 0.500 2584.000 54.300 131.400 97.500
8 0.000 0.000 0.000 2.000 6.000 5.000 0.000
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9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
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9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
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# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)  
VERSUS  
AVERAGING TIME

| DOWNWIND SECTOR | DISTANCE (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |                          | HOURS PER YEAR MAX |                                  | DOWNWIND SECTOR |
|-----------------|-------------------|---|-----------|------------|----------|--------------------------|--------------------|----------------------------------|-----------------|
|                 |                   | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE     | 0-2 HR X/Q IS EXCEEDED IN SECTOR |                 |
| S               | 3000.             | 1.49E-06  | 6.92E-07  | 4.71E-07   | 2.05E-07 | 6.19E-08                 | 1.43E-08           | 22.0                             | S               |
| SSW             | 3000.             | 1.37E-06  | 6.10E-07  | 4.08E-07   | 1.70E-07 | 4.83E-08                 | 1.04E-08           | 303.1                            | SSW             |
| SW              | 3000.             | 1.74E-06  | 7.58E-07  | 5.00E-07   | 2.03E-07 | 5.55E-08                 | 1.14E-08           | 34.8                             | SW              |
| WSW             | 3000.             | 1.88E-06  | 8.37E-07  | 5.58E-07   | 2.32E-07 | 6.55E-08                 | 1.40E-08           | 40.6                             | WSW             |
| W               | 3000.             | 1.95E-06  | 8.85E-07  | 5.97E-07   | 2.54E-07 | 7.43E-08                 | 1.65E-08           | 43.7                             | W               |
| WNW             | 3000.             | 1.64E-06  | 7.38E-07  | 4.96E-07   | 2.09E-07 | 6.04E-08                 | 1.32E-08           | 28.8                             | WNW             |
| NW              | 3000.             | 1.40E-06  | 6.44E-07  | 4.36E-07   | 1.87E-07 | 5.54E-08                 | 1.25E-08           | 18.5                             | NW              |
| NNW             | 3000.             | 1.29E-06  | 5.76E-07  | 3.85E-07   | 1.60E-07 | 4.56E-08                 | 9.80E-09           | 16.1                             | NNW             |
| N               | 3000.             | 1.36E-06  | 6.58E-07  | 4.57E-07   | 2.07E-07 | 6.64E-08                 | 1.65E-08           | 15.6                             | N               |
| NNE             | 3000.             | 1.16E-06  | 5.22E-07  | 3.49E-07   | 1.46E-07 | 4.18E-08                 | 9.06E-09           | 11.7                             | NNE             |
| NE              | 3000.             | 1.17E-06  | 5.06E-07  | 3.34E-07   | 1.35E-07 | 3.68E-08                 | 7.51E-09           | 12.4                             | NE              |
| ENE             | 3000.             | 1.07E-06  | 4.57E-07  | 2.99E-07   | 1.19E-07 | 3.16E-08                 | 6.25E-09           | 9.9                              | ENE             |
| E               | 3000.             | 1.16E-06  | 5.29E-07  | 3.58E-07   | 1.53E-07 | 4.53E-08                 | 1.02E-08           | 12.5                             | E               |
| ESE             | 3000.             | 1.01E-06  | 4.86E-07  | 3.37E-07   | 1.52E-07 | 4.85E-08                 | 1.20E-08           | 11.8                             | ESE             |
| SE              | 3000.             | 1.24E-06  | 6.02E-07  | 4.20E-07   | 1.92E-07 | 6.24E-08                 | 1.58E-08           | 14.2                             | SE              |
| SSE             | 3000.             | 1.40E-06  | 7.02E-07  | 4.97E-07   | 2.36E-07 | 8.06E-08                 | 2.17E-08           | 16.1                             | SSE             |
| MAX X/Q         |                   | 1.95E-06  |           |            |          | TOTAL HOURS AROUND SITE: | 611.9              |                                  |                 |
| SRP 2.3.4       | 3000.             | 1.71E-06  | 8.33E-07  | 5.80E-07   | 2.65E-07 | 8.60E-08                 | 2.17E-08           |                                  |                 |
| SITE LIMIT      |                   | 1.71E-06  | 8.33E-07  | 5.80E-07   | 2.65E-07 | 8.60E-08                 | 2.17E-08           |                                  |                 |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND SECTOR | DISTANCE (METERS) | FUMIGATION X/Q |
|-----------------|-------------------|----------------|
| S               | 3000.             | 1.52E-05       |
| SSW             | 3000.             | 1.52E-05       |
| SW              | 3000.             | 1.52E-05       |
| WSW             | 3000.             | 1.52E-05       |
| W               | 3000.             | 1.52E-05       |
| WNW             | 3000.             | 1.52E-05       |
| NW              | 3000.             | 1.52E-05       |
| NNW             | 3000.             | 1.52E-05       |
| N               | 3000.             | 1.52E-05       |
| NNE             | 3000.             | 1.52E-05       |
| NE              | 3000.             | 1.52E-05       |
| ENE             | 3000.             | 1.52E-05       |
| E               | 3000.             | 1.52E-05       |
| ESE             | 3000.             | 1.52E-05       |

## ATTACHMENT C

|     |       |          |
|-----|-------|----------|
| SE  | 3000. | 1.52E-05 |
| SSE | 3000. | 1.52E-05 |

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |           |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |     | DOWNWIND<br>SECTOR |
|--------------------------------------|---|-----------|------------|----------|-----------|--------------------------|---|-----|--------------------|
|                                      | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE           | IN SECTOR                                       |     |                    |
| S 4000.                              | 1.50E-06  | 7.10E-07  | 4.88E-07   | 2.17E-07 | 6.77E-08  | 1.63E-08                 | 25.6  | S   |                    |
| SSW 4000.                            | 1.35E-06  | 6.13E-07  | 4.13E-07   | 1.75E-07 | 5.10E-08  | 1.13E-08                 | 351.8   | SSW |                    |
| SW 4000.                             | 1.70E-06  | 7.50E-07  | 4.99E-07   | 2.06E-07 | 5.79E-08  | 1.23E-08                 | 35.1  | SW  |                    |
| WSW 4000.                            | 1.82E-06  | 8.21E-07  | 5.52E-07   | 2.33E-07 | 6.76E-08  | 1.49E-08                 | 40.9  | WSW |                    |
| W 4000.                              | 1.87E-06  | 8.65E-07  | 5.88E-07   | 2.55E-07 | 7.69E-08  | 1.77E-08                 | 43.7  | W   |                    |
| WNW 4000.                            | 1.57E-06  | 7.21E-07  | 4.89E-07   | 2.10E-07 | 6.24E-08  | 1.41E-08                 | 29.1  | WNW |                    |
| NW 4000.                             | 1.42E-06  | 6.64E-07  | 4.54E-07   | 1.99E-07 | 6.09E-08  | 1.43E-08                 | 22.3  | NW  |                    |
| NNW 4000.                            | 1.28E-06  | 5.91E-07  | 4.01E-07   | 1.73E-07 | 5.17E-08  | 1.18E-08                 | 17.7  | NNW |                    |
| N 4000.                              | 1.36E-06  | 6.74E-07  | 4.74E-07   | 2.21E-07 | 7.37E-08  | 1.93E-08                 | 20.0  | N   |                    |
| NNE 4000.                            | 1.16E-06  | 5.35E-07  | 3.64E-07   | 1.58E-07 | 4.74E-08  | 1.09E-08                 | 13.0  | NNE |                    |
| NE 4000.                             | 1.15E-06  | 5.16E-07  | 3.45E-07   | 1.45E-07 | 4.14E-08  | 8.98E-09                 | 13.5  | NE  |                    |
| ENE 4000.                            | 1.06E-06  | 4.66E-07  | 3.09E-07   | 1.27E-07 | 3.54E-08  | 7.42E-09                 | 11.0  | ENE |                    |
| E 4000.                              | 1.12E-06  | 5.28E-07  | 3.62E-07   | 1.59E-07 | 4.92E-08  | 1.17E-08                 | 14.0  | E   |                    |
| ESE 4000.                            | 1.05E-06  | 5.11E-07  | 3.58E-07   | 1.64E-07 | 5.39E-08  | 1.38E-08                 | 14.1  | ESE |                    |
| SE 4000.                             | 1.23E-06  | 6.14E-07  | 4.35E-07   | 2.05E-07 | 6.96E-08  | 1.86E-08                 | 15.9  | SE  |                    |
| SSE 4000.                            | 1.43E-06  | 7.27E-07  | 5.19E-07   | 2.49E-07 | 8.70E-08  | 2.40E-08                 | 22.0  | SSE |                    |
| MAX X/Q                              | 1.87E-06  |           |            |          |           | TOTAL HOURS AROUND SITE: | 689.6   |     |                    |
| SRP 2.3.4 4000.                      | 1.69E-06  | 8.36E-07  | 5.88E-07   | 2.74E-07 | 9.17E-08  | 2.40E-08                 |   |     |                    |
| SITE LIMIT                           | 1.69E-06  | 8.36E-07  | 5.88E-07   | 2.74E-07 | 9.17E-08  | 2.40E-08                 |   |     |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

DOWNWIND DISTANCE FUMIGATION

| SECTOR (METERS) | X/Q      |
|-----------------|----------|
| S 4000.         | 1.17E-05 |
| SSW 4000.       | 1.17E-05 |
| SW 4000.        | 1.17E-05 |
| WSW 4000.       | 1.17E-05 |
| W 4000.         | 1.17E-05 |
| WNW 4000.       | 1.17E-05 |
| NW 4000.        | 1.17E-05 |
| NNW 4000.       | 1.17E-05 |
| N 4000.         | 1.17E-05 |
| NNE 4000.       | 1.17E-05 |
| NE 4000.        | 1.17E-05 |
| ENE 4000.       | 1.17E-05 |
| E 4000.         | 1.17E-05 |
| ESE 4000.       | 1.17E-05 |

# ATTACHMENT C

SE 4000. 1.17E-05  
 SSE 4000. 1.17E-05

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
 CHECK THE REASONABLENESS OF THE ENVELOPES  
 COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
 FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

## Off-Gas Stack to Control Room Intake (5000 and 6000 m; Tower 2 Meteorology; RG 1.23, Revision 1 Wind Speed Categories)

1 1111  
 Peach Bottom Stack Release  
 97.5 meters 10.1-96.3 meters

Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

| 11    | 1   |     |     |     |      |     |     |     |     |     |     |     |     |     |     |    |    |    |    |     |
|-------|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|----|----|----|----|-----|
| 2584. | 54. | 31  | 13  | 1.4 | 97.5 |     |     |     |     |     |     |     |     |     |     |    |    |    |    |     |
| 0     | 0   | 0   | 2   | 6   | 5    | 0   |     |     |     |     |     |     |     |     |     |    |    |    |    |     |
| 0.    | 0.  | 0.  | 0.  | 0.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 0.    | 0.  | 0.  | 0.  | 3.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 0.    | 2.  | 10. | 10. | 15. | 3.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 5.    | 6.  | 10. | 23. | 59. | 25.  | 2.  | 0.  | 0.  | 1.  | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 1. | 0.  |
| 1.    | 3.  | 11. | 18. | 43. | 40.  | 10. | 4.  | 2.  | 2.  | 2.  | 0.  | 1.  | 3.  | 0.  | 1.  | 3. | 0. | 0. | 0. | 0.  |
| 0.    | 6.  | 10. | 11. | 13. | 17.  | 9.  | 0.  | 7.  | 4.  | 3.  | 3.  | 3.  | 2.  | 3.  | 0.  | 5. | 0. | 0. | 0. | 5.  |
| 0.    | 1.  | 2.  | 13. | 8.  | 3.   | 9.  | 0.  | 4.  | 3.  | 0.  | 6.  | 13. | 7.  | 3.  | 4.  | 0. | 0. | 0. | 0. | 0.  |
| 2.    | 4.  | 9.  | 11. | 2.  | 3.   | 7.  | 0.  | 6.  | 2.  | 2.  | 1.  | 14. | 5.  | 2.  | 14. | 0. | 0. | 0. | 0. | 0.  |
| 1.    | 2.  | 0.  | 1.  | 0.  | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 2.  | 10. | 2.  | 0.  | 1.  | 0. | 0. | 0. | 0. | 1.  |
| 1.    | 0.  | 0.  | 0.  | 0.  | 1.   | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 6.  | 5.  | 1.  | 1.  | 0. | 0. | 0. | 0. | 1.  |
| 0.    | 1.  | 1.  | 0.  | 0.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 0.    | 1.  | 1.  | 9.  | 5.  | 0.   | 2.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 1.    | 7.  | 5.  | 8.  | 21. | 5.   | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0.  | 1.  | 0.  | 1. | 0. | 0. | 0. | 0.  |
| 12.   | 15. | 9.  | 11. | 34. | 19.  | 6.  | 1.  | 1.  | 4.  | 3.  | 1.  | 3.  | 1.  | 2.  | 3.  | 0. | 0. | 0. | 0. | 3.  |
| 1.    | 11. | 11. | 18. | 6.  | 21.  | 11. | 4.  | 4.  | 4.  | 4.  | 2.  | 3.  | 5.  | 1.  | 7.  | 0. | 0. | 0. | 0. | 7.  |
| 2.    | 5.  | 4.  | 2.  | 5.  | 9.   | 13. | 5.  | 17. | 9.  | 6.  | 5.  | 13. | 2.  | 1.  | 12. | 0. | 0. | 0. | 0. | 12. |
| 3.    | 0.  | 3.  | 1.  | 3.  | 0.   | 9.  | 6.  | 14. | 5.  | 6.  | 7.  | 10. | 8.  | 3.  | 15. | 0. | 0. | 0. | 0. | 15. |
| 8.    | 2.  | 1.  | 1.  | 0.  | 2.   | 5.  | 3.  | 22. | 5.  | 3.  | 13. | 21. | 15. | 6.  | 20. | 0. | 0. | 0. | 0. | 20. |
| 1.    | 3.  | 0.  | 0.  | 0.  | 1.   | 1.  | 1.  | 6.  | 1.  | 1.  | 2.  | 11. | 12. | 5.  | 6.  | 0. | 0. | 0. | 0. | 6.  |
| 0.    | 0.  | 1.  | 0.  | 0.  | 0.   | 0.  | 0.  | 1.  | 1.  | 0.  | 1.  | 7.  | 10. | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 0.    | 2.  | 2.  | 1.  | 0.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 0.    | 3.  | 10. | 14. | 1.  | 0.   | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0. | 0. | 0. | 0. | 0.  |
| 4.    | 7.  | 11. | 16. | 31. | 17.  | 2.  | 0.  | 1.  | 0.  | 0.  | 0.  | 0.  | 0.  | 0.  | 1.  | 0. | 0. | 0. | 0. | 1.  |
| 18.   | 14. | 15. | 17. | 17. | 40.  | 6.  | 4.  | 11. | 4.  | 7.  | 3.  | 2.  | 2.  | 3.  | 16. | 0. | 0. | 0. | 0. | 16. |
| 26.   | 12. | 8.  | 11. | 10. | 21.  | 26. | 13. | 20. | 13. | 9.  | 4.  | 16. | 6.  | 8.  | 35. | 0. | 0. | 0. | 0. | 35. |
| 21.   | 6.  | 3.  | 8.  | 5.  | 11.  | 31. | 10. | 40. | 14. | 15. | 14. | 23. | 13. | 9.  | 45. | 0. | 0. | 0. | 0. | 45. |
| 8.    | 8.  | 0.  | 3.  | 2.  | 3.   | 15. | 12. | 37. | 17. | 11. | 15. | 11. | 21. | 18. | 43. | 0. | 0. | 0. | 0. | 43. |
| 14.   | 2.  | 4.  | 2.  | 2.  | 3.   | 7.  | 5.  | 48. | 18. | 16. | 24. | 48. | 45. | 26. | 74. | 0. | 0. | 0. | 0. | 74. |
| 4.    | 1.  | 0.  | 0.  | 1.  | 2.   | 0.  | 1.  | 10. | 0.  | 3.  | 3.  | 29. | 27. | 22. | 14. | 0. | 0. | 0. | 0. | 14. |
| 1.    | 3.  | 0.  | 0.  | 0.  | 0.   | 0.  | 0.  | 1.  | 0.  | 2.  | 2.  | 16. | 33. | 12. | 4.  | 0. | 0. | 0. | 0. | 4.  |
| 18.   | 18. | 28. | 26. | 28. | 20.  | 14. | 13. | 12. | 6.  | 9.  | 6.  | 8.  | 19. | 8.  | 10. | 0. | 0. | 0. | 0. | 10. |

# ATTACHMENT C

41. 40. 80. 93. 87. 66. 31. 22. 29. 17. 23. 9. 18. 19. 28. 40.  
67. 53. 78. 99. 130. 77. 54. 50. 39. 31. 28. 24. 30. 19. 40. 50.  
209. 119. 120. 174. 227. 179. 192. 134. 171. 110. 98. 90. 89. 59. 118. 231.  
216. 175. 125. 187. 215. 168. 282. 234. 320. 203. 128. 80. 109. 115. 186. 390.  
237. 151. 118. 123. 134. 129. 212. 204. 330. 193. 142. 89. 134. 160. 235. 438.  
233. 99. 80. 54. 103. 102. 129. 147. 274. 132. 80. 103. 142. 196. 332. 406.  
278. 113. 52. 44. 87. 94. 107. 58. 345. 108. 91. 139. 311. 543. 821. 694.  
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25. 10. 10. 2. 18. 7. 8. 1. 40. 6. 5. 12. 124. 227. 256. 94.  
21. 15. 15. 20. 24. 17. 26. 16. 26. 16. 17. 19. 30. 17. 23. 11.  
39. 29. 21. 41. 36. 43. 35. 43. 44. 40. 42. 35. 24. 19. 16. 23.  
50. 43. 35. 51. 65. 48. 90. 69. 60. 65. 63. 36. 42. 23. 30. 36.  
137. 92. 91. 138. 168. 113. 186. 176. 263. 196. 164. 111. 102. 82. 112. 115.  
177. 131. 95. 87. 123. 134. 205. 234. 432. 273. 191. 116. 120. 116. 154. 200.  
180. 79. 69. 40. 68. 116. 152. 195. 423. 257. 165. 149. 193. 161. 255. 213.  
102. 30. 25. 9. 37. 61. 88. 142. 284. 182. 99. 157. 213. 232. 277. 276.  
110. 26. 17. 6. 39. 46. 69. 103. 367. 150. 159. 177. 417. 441. 493. 336.  
24. 10. 3. 4. 11. 20. 16. 11. 72. 19. 27. 38. 88. 124. 101. 48.  
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16. 7. 13. 10. 11. 12. 10. 12. 12. 12. 15. 15. 14. 13. 13. 7.  
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26. 13. 14. 10. 13. 18. 27. 34. 33. 29. 27. 36. 22. 18. 18. 20.  
53. 19. 18. 17. 15. 28. 43. 44. 75. 89. 99. 64. 43. 39. 60. 59.  
62. 19. 7. 10. 14. 18. 37. 32. 89. 72. 105. 77. 88. 49. 69. 53.  
29. 9. 6. 0. 5. 11. 18. 46. 46. 46. 66. 85. 85. 74. 87. 57.  
12. 4. 3. 0. 0. 2. 7. 15. 40. 19. 31. 57. 85. 55. 67. 47.  
2. 0. 0. 0. 0. 1. 4. 6. 24. 20. 23. 80. 128. 104. 61. 19.  
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4. 5. 5. 4. 5. 3. 3. 2. 9. 1. 5. 8. 5. 6. 6. 9.  
4. 9. 5. 4. 5. 1. 11. 4. 8. 9. 6. 8. 7. 8. 11. 12.  
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17. 3. 5. 4. 3. 1. 8. 3. 6. 16. 36. 25. 28. 26. 53. 62.  
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# ATTACHMENT C

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USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

## PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Stack Release
3 97.5 meters 10.1-96.3 meters
4
5 Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T 6 11 42771 1
7 0.500 2584.000 54.300 131.400 97.500
8 0.000 0.000 0.000 2.000 6.000 5.000 0.000
9 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
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9 5.000 6.000 10.000 23.000 59.000 25.000 2.000 0.000 0.000 1.000 2.000 0.000 0.000 0.000 0.000 0.000 1.000
9 1.000 3.000 11.000 18.000 43.000 40.000 10.000 4.000 2.000 2.000 2.000 0.000 1.000 3.000 0.000 0.000
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9 1.000 7.000 5.000 8.000 21.000 5.000 1.000 0.000 0.000 0.000 0.000 0.000 1.000 0.000 1.000 0.000
9 12.000 15.000 9.000 11.000 34.000 19.000 6.000 1.000 1.000 4.000 3.000 1.000 3.000 1.000 2.000 3.000
9 1.000 11.000 11.000 18.000 6.000 21.000 11.000 4.000 4.000 4.000 4.000 2.000 3.000 5.000 1.000 7.000
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9 3.000 0.000 3.000 1.000 3.000 0.000 9.000 6.000 14.000 5.000 6.000 7.000 10.000 8.000 3.000 15.000
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9 0.000 3.000 10.000 14.000 1.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
9 4.000 7.000 11.000 16.000 31.000 17.000 2.000 0.000 1.000 0.000 0.000 0.000 0.000 0.000 0.000 1.000
9 18.000 14.000 15.000 17.000 17.000 40.000 6.000 4.000 11.000 4.000 7.000 3.000 2.000 2.000 3.000 16.000
9 26.000 12.000 8.000 11.000 10.000 21.000 26.000 13.000 20.000 13.000 9.000 4.000 16.000 6.000 8.000 35.000
9 21.000 6.000 3.000 8.000 5.000 11.000 31.000 10.000 40.000 14.000 15.000 14.000 23.000 13.000 9.000 45.000
9 8.000 8.000 0.000 3.000 2.000 3.000 15.000 12.000 37.000 17.000 11.000 15.000 11.000 21.000 18.000 43.000
9 14.000 2.000 4.000 2.000 2.000 3.000 7.000 5.000 48.000 18.000 16.000 24.000 48.000 45.000 26.000 74.000
9 4.000 1.000 0.000 0.000 1.000 2.000 0.000 1.000 10.000 0.000 3.000 3.000 29.000 27.000 22.000 14.000
9 1.000 3.000 0.000 0.000 0.000 0.000 0.000 0.000 1.000 0.000 2.000 2.000 16.000 33.000 12.000 4.000
9 18.000 18.000 28.000 26.000 28.000 20.000 14.000 13.000 12.000 6.000 9.000 6.000 8.000 19.000 8.000 10.000
9 41.000 40.000 80.000 93.000 87.000 66.000 31.000 22.000 29.000 17.000 23.000 9.000 18.000 19.000 28.000 40.000
9 67.000 53.000 78.000 99.000 130.000 77.000 54.000 50.000 39.000 31.000 28.000 24.000 30.000 19.000 40.000 50.000
9 209.000 119.000 120.000 174.000 227.000 179.000 192.000 134.000 171.000 110.000 98.000 90.000 89.000 59.000 118.000 231.000
9 216.000 175.000 125.000 187.000 215.000 168.000 282.000 234.000 320.000 203.000 128.000 80.000 109.000 115.000 186.000 390.000
9 237.000 151.000 118.000 123.000 134.000 129.000 212.000 204.000 330.000 193.000 142.000 89.000 134.000 160.000 235.000 438.000
9 233.000 99.000 80.000 54.000 103.000 102.000 129.000 147.000 274.000 132.000 80.000 103.000 142.000 196.000 332.000 406.000
9 278.000 113.000 52.000 44.000 87.000 94.000 107.000 58.000 345.000 108.000 91.000 139.000 311.000 543.000 821.000 694.000
9 69.000 28.000 13.000 11.000 24.000 24.000 15.000 10.000 96.000 21.000 15.000 20.000 211.000 392.000 489.000 230.000
9 25.000 10.000 10.000 2.000 18.000 7.000 8.000 1.000 40.000 6.000 5.000 12.000 124.000 227.000 256.000 94.000
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## ATTACHMENT C

|       |         |         |        |         |         |         |         |         |         |         |         |         |         |         |         |         |       |       |       |       |      |      |
|-------|---------|---------|--------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-------|-------|-------|-------|------|------|
| 9     | 21.000  | 15.000  | 15.000 | 20.000  | 24.000  | 17.000  | 26.000  | 16.000  | 26.000  | 16.000  | 17.000  | 19.000  | 30.000  | 17.000  | 23.000  | 11.000  |       |       |       |       |      |      |
| 9     | 39.000  | 29.000  | 21.000 | 41.000  | 36.000  | 43.000  | 35.000  | 43.000  | 44.000  | 40.000  | 42.000  | 35.000  | 24.000  | 19.000  | 16.000  | 23.000  |       |       |       |       |      |      |
| 9     | 50.000  | 43.000  | 35.000 | 51.000  | 65.000  | 48.000  | 90.000  | 69.000  | 60.000  | 65.000  | 63.000  | 36.000  | 42.000  | 23.000  | 30.000  | 36.000  |       |       |       |       |      |      |
| 9     | 137.000 | 92.000  | 91.000 | 138.000 | 168.000 | 113.000 | 186.000 | 176.000 | 263.000 | 196.000 | 164.000 | 111.000 | 102.000 | 82.000  | 112.000 | 115.000 |       |       |       |       |      |      |
| 9     | 177.000 | 131.000 | 95.000 | 87.000  | 123.000 | 134.000 | 205.000 | 234.000 | 432.000 | 273.000 | 191.000 | 116.000 | 120.000 | 116.000 | 154.000 | 200.000 |       |       |       |       |      |      |
| 9     | 180.000 | 79.000  | 69.000 | 40.000  | 68.000  | 116.000 | 152.000 | 195.000 | 423.000 | 257.000 | 165.000 | 149.000 | 193.000 | 161.000 | 255.000 | 213.000 |       |       |       |       |      |      |
| 9     | 102.000 | 30.000  | 25.000 | 9.000   | 37.000  | 61.000  | 88.000  | 142.000 | 284.000 | 182.000 | 99.000  | 157.000 | 213.000 | 232.000 | 277.000 | 276.000 |       |       |       |       |      |      |
| 9     | 110.000 | 26.000  | 17.000 | 6.000   | 39.000  | 46.000  | 69.000  | 103.000 | 367.000 | 150.000 | 159.000 | 177.000 | 417.000 | 441.000 | 493.000 | 336.000 |       |       |       |       |      |      |
| 9     | 24.000  | 10.000  | 3.000  | 4.000   | 11.000  | 20.000  | 16.000  | 11.000  | 72.000  | 19.000  | 27.000  | 38.000  | 88.000  | 124.000 | 101.000 | 48.000  |       |       |       |       |      |      |
| 9     | 8.000   | 1.000   | 6.000  | 1.000   | 21.000  | 3.000   | 9.000   | 1.000   | 9.000   | 2.000   | 2.000   | 2.000   | 10.000  | 12.000  | 10.000  | 14.000  |       |       |       |       |      |      |
| 9     | 16.000  | 7.000   | 13.000 | 10.000  | 11.000  | 12.000  | 10.000  | 12.000  | 12.000  | 12.000  | 15.000  | 15.000  | 14.000  | 13.000  | 13.000  | 7.000   |       |       |       |       |      |      |
| 9     | 10.000  | 12.000  | 9.000  | 16.000  | 20.000  | 11.000  | 18.000  | 20.000  | 11.000  | 20.000  | 17.000  | 18.000  | 16.000  | 15.000  | 13.000  | 15.000  |       |       |       |       |      |      |
| 9     | 26.000  | 13.000  | 14.000 | 10.000  | 13.000  | 18.000  | 27.000  | 34.000  | 33.000  | 29.000  | 27.000  | 36.000  | 22.000  | 18.000  | 18.000  | 20.000  |       |       |       |       |      |      |
| 9     | 53.000  | 19.000  | 18.000 | 17.000  | 15.000  | 28.000  | 43.000  | 44.000  | 75.000  | 89.000  | 99.000  | 64.000  | 43.000  | 39.000  | 60.000  | 59.000  |       |       |       |       |      |      |
| 9     | 62.000  | 19.000  | 7.000  | 10.000  | 14.000  | 18.000  | 37.000  | 32.000  | 89.000  | 72.000  | 105.000 | 77.000  | 88.000  | 49.000  | 69.000  | 53.000  |       |       |       |       |      |      |
| 9     | 29.000  | 9.000   | 6.000  | 0.000   | 5.000   | 11.000  | 18.000  | 46.000  | 46.000  | 46.000  | 66.000  | 85.000  | 85.000  | 74.000  | 87.000  | 57.000  |       |       |       |       |      |      |
| 9     | 12.000  | 4.000   | 3.000  | 0.000   | 0.000   | 2.000   | 7.000   | 15.000  | 40.000  | 19.000  | 31.000  | 57.000  | 85.000  | 55.000  | 67.000  | 47.000  |       |       |       |       |      |      |
| 9     | 2.000   | 0.000   | 0.000  | 0.000   | 0.000   | 1.000   | 4.000   | 6.000   | 24.000  | 20.000  | 23.000  | 80.000  | 128.000 | 104.000 | 61.000  | 19.000  |       |       |       |       |      |      |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 3.000   | 1.000   | 21.000  | 23.000  | 23.000  | 0.000   | 5.000   |       |       |       |       |      |      |
| 9     | 1.000   | 0.000   | 0.000  | 0.000   | 4.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 1.000   | 0.000   | 0.000   | 0.000   |       |       |       |       |      |      |
| 9     | 7.000   | 9.000   | 6.000  | 6.000   | 8.000   | 2.000   | 1.000   | 7.000   | 8.000   | 8.000   | 1.000   | 10.000  | 8.000   | 8.000   | 7.000   | 10.000  |       |       |       |       |      |      |
| 9     | 4.000   | 5.000   | 5.000  | 4.000   | 5.000   | 3.000   | 3.000   | 2.000   | 9.000   | 1.000   | 5.000   | 8.000   | 5.000   | 6.000   | 6.000   | 9.000   |       |       |       |       |      |      |
| 9     | 4.000   | 9.000   | 5.000  | 4.000   | 5.000   | 1.000   | 11.000  | 4.000   | 8.000   | 9.000   | 6.000   | 8.000   | 7.000   | 8.000   | 11.000  | 12.000  |       |       |       |       |      |      |
| 9     | 35.000  | 8.000   | 15.000 | 13.000  | 7.000   | 5.000   | 12.000  | 5.000   | 22.000  | 19.000  | 22.000  | 19.000  | 25.000  | 22.000  | 44.000  | 34.000  |       |       |       |       |      |      |
| 9     | 17.000  | 3.000   | 5.000  | 4.000   | 3.000   | 1.000   | 8.000   | 3.000   | 6.000   | 16.000  | 36.000  | 25.000  | 28.000  | 26.000  | 53.000  | 62.000  |       |       |       |       |      |      |
| 9     | 7.000   | 4.000   | 1.000  | 0.000   | 0.000   | 1.000   | 4.000   | 3.000   | 8.000   | 4.000   | 16.000  | 40.000  | 27.000  | 20.000  | 41.000  | 29.000  |       |       |       |       |      |      |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 2.000   | 1.000   | 1.000   | 5.000   | 10.000  | 23.000  | 37.000  | 10.000  | 17.000  | 8.000   |       |       |       |       |      |      |
| 9     | 1.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 1.000   | 0.000   | 5.000   | 14.000  | 24.000  | 32.000  | 5.000   | 4.000   |       |       |       |       |      |      |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 2.000   | 1.000   | 2.000   | 0.000   | 0.000   |       |       |       |       |      |      |
| 9     | 0.000   | 0.000   | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 10    | 101.  | 0.500 |       |      |      |
| 2.350 | 3.470   | 4.590   | 6.820  | 9.060   | 11.300  | 13.530  | 18.010  | 22.370  | 55.000  | 0.000   | 0.000   | 0.000   | 11      | 5000.   | 5000.   | 5000.   | 5000. | 5000. | 5000. | 5000. |      |      |
| 5000. | 5000.   | 5000.   | 5000.  | 5000.   | 5000.   | 5000.   | 5000.   | 5000.   | 5000.   | 11      | 6000.   | 6000.   | 6000.   | 6000.   | 6000.   | 6000.   | 6000. | 6000. | 6000. | 6000. |      |      |
| 6000. | 6000.   | 6000.   | 6000.  | 6000.   | 6000.   | 6000.   | 12      | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0   | 1.0   | 1.0   | 1.0   |      |      |
| 1.0   | 1.0     | 1.0     | 1.0    |         |         |         |         |         |         |         |         |         |         |         |         |         |       |       |       |       |      |      |
| 12    |         | 1.0     | 1.0    | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0   | 1.0   | 1.0   | 13    | 500. | 500. |
| 500.  | 500.    | 500.    | 500.   | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    | 500.    |         |         |         |       |       |       |       |      |      |
| 14    |         | 0.      | 0.     | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.      | 0.    | 0.    | 0.    | 0.    |      |      |

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 97.5 meters

TYPE OF RELEASE: Stack Release

DELTA-T HEIGHTS: 10.1-96.3 meters

SOURCE OF DATA:

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)

| DOWNWIND DISTANCE<br>SECTOR (METERS) | VERSUS<br>AVERAGING TIME |           |            |          |           |                          | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |     | DOWNWIND<br>SECTOR |
|--------------------------------------|--------------------------|-----------|------------|----------|-----------|--------------------------|---|-----|--------------------|
|                                      | 0-2 HOURS                | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE           | IN SECTOR                                       |     |                    |
| S 5000.                              | 1.49E-06                 | 7.06E-07  | 4.86E-07   | 2.16E-07 | 6.77E-08  | 1.63E-08                 | 25.5  | S   |                    |
| SSW 5000.                            | 1.33E-06                 | 6.04E-07  | 4.07E-07   | 1.73E-07 | 5.03E-08  | 1.11E-08                 | 348.2   | SSW |                    |
| SW 5000.                             | 1.64E-06                 | 7.26E-07  | 4.83E-07   | 2.00E-07 | 5.63E-08  | 1.20E-08                 | 33.9  | SW  |                    |
| WSW 5000.                            | 1.77E-06                 | 8.01E-07  | 5.38E-07   | 2.27E-07 | 6.58E-08  | 1.45E-08                 | 39.0  | WSW |                    |
| W 5000.                              | 1.86E-06                 | 8.58E-07  | 5.83E-07   | 2.52E-07 | 7.56E-08  | 1.73E-08                 | 43.7  | W   |                    |
| WNW 5000.                            | 1.56E-06                 | 7.15E-07  | 4.84E-07   | 2.07E-07 | 6.14E-08  | 1.39E-08                 | 29.2  | WNW |                    |
| NW 5000.                             | 1.41E-06                 | 6.63E-07  | 4.54E-07   | 2.00E-07 | 6.15E-08  | 1.45E-08                 | 22.2  | NW  |                    |
| NNW 5000.                            | 1.28E-06                 | 5.93E-07  | 4.04E-07   | 1.76E-07 | 5.32E-08  | 1.23E-08                 | 17.7  | NNW |                    |
| N 5000.                              | 1.36E-06                 | 6.75E-07  | 4.76E-07   | 2.23E-07 | 7.53E-08  | 1.99E-08                 | 20.0  | N   |                    |
| NNE 5000.                            | 1.15E-06                 | 5.38E-07  | 3.68E-07   | 1.61E-07 | 4.92E-08  | 1.15E-08                 | 13.0  | NNE |                    |
| NE 5000.                             | 1.15E-06                 | 5.19E-07  | 3.49E-07   | 1.48E-07 | 4.29E-08  | 9.45E-09                 | 13.5  | NE  |                    |
| ENE 5000.                            | 1.05E-06                 | 4.69E-07  | 3.12E-07   | 1.30E-07 | 3.66E-08  | 7.81E-09                 | 11.0  | ENE |                    |
| E 5000.                              | 1.12E-06                 | 5.28E-07  | 3.63E-07   | 1.61E-07 | 5.00E-08  | 1.20E-08                 | 14.0  | E   |                    |
| ESE 5000.                            | 1.04E-06                 | 5.10E-07  | 3.57E-07   | 1.65E-07 | 5.43E-08  | 1.40E-08                 | 14.1  | ESE |                    |
| SE 5000.                             | 1.23E-06                 | 6.16E-07  | 4.37E-07   | 2.07E-07 | 7.05E-08  | 1.89E-08                 | 15.9  | SE  |                    |
| SSE 5000.                            | 1.42E-06                 | 7.23E-07  | 5.15E-07   | 2.47E-07 | 8.62E-08  | 2.37E-08                 | 22.0  | SSE |                    |
| MAX X/Q                              | 1.86E-06                 |           |            |          |           | TOTAL HOURS AROUND SITE: | 683.2   |     |                    |
| SRP 2.3.4 5000.                      | 1.67E-06                 | 8.28E-07  | 5.83E-07   | 2.72E-07 | 9.07E-08  | 2.37E-08                 |   |     |                    |
| SITE LIMIT                           | 1.67E-06                 | 8.28E-07  | 5.83E-07   | 2.72E-07 | 9.07E-08  | 2.37E-08                 |   |     |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

DOWNWIND DISTANCE FUMIGATION

| SECTOR (METERS) | X/Q      |
|-----------------|----------|
| S 5000.         | 9.60E-06 |
| SSW 5000.       | 9.60E-06 |
| SW 5000.        | 9.60E-06 |
| WSW 5000.       | 9.60E-06 |
| W 5000.         | 9.60E-06 |
| WNW 5000.       | 9.60E-06 |
| NW 5000.        | 9.60E-06 |
| NNW 5000.       | 9.60E-06 |
| N 5000.         | 9.60E-06 |
| NNE 5000.       | 9.60E-06 |
| NE 5000.        | 9.60E-06 |
| ENE 5000.       | 9.60E-06 |
| E 5000.         | 9.60E-06 |
| ESE 5000.       | 9.60E-06 |

## ATTACHMENT C

|     |       |          |
|-----|-------|----------|
| SE  | 5000. | 9.60E-06 |
| SSE | 5000. | 9.60E-06 |

**\*\*NOTE\*\*:** VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.

# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 04/20/08

PLANT NAME: Peach Bottom  
 DATA PERIOD:  
 TYPE OF RELEASE: Stack Release  
 SOURCE OF DATA:

METEOROLOGICAL INSTRUMENTATION  
 WIND SENSORS HEIGHT: 97.5 meters  
 DELTA-T HEIGHTS: 10.1-96.3 meters

COMMENTS: Peach Bottom, Tower 2 1984-1988 met data, 320 ft wind, 33-316 ft Delta T  
 PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) VERSUS AVERAGING TIME

| DOWNWIND DISTANCE<br>SECTOR (METERS) | RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER) |           |            |          |           | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |           | DOWNWIND<br>SECTOR |
|--------------------------------------|---|-----------|------------|----------|-----------|---|-----------|--------------------|
|                                      | 0-2 HOURS   | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS | ANNUAL AVERAGE                                  | IN SECTOR |                    |
| S 6000.                              | 1.40E-06  | 6.66E-07  | 4.59E-07   | 2.05E-07 | 6.44E-08  | 1.56E-08  | 25.5      | S                  |
| SSW 6000.                            | 1.24E-06  | 5.65E-07  | 3.81E-07   | 1.62E-07 | 4.74E-08  | 1.06E-08  | 384.5     | SSW                |
| SW 6000.                             | 1.53E-06  | 6.78E-07  | 4.52E-07   | 1.87E-07 | 5.28E-08  | 1.12E-08  | 33.6      | SW                 |
| WSW 6000.                            | 1.66E-06  | 7.51E-07  | 5.05E-07   | 2.13E-07 | 6.17E-08  | 1.35E-08  | 38.9      | WSW                |
| W 6000.                              | 1.75E-06  | 8.06E-07  | 5.48E-07   | 2.37E-07 | 7.10E-08  | 1.63E-08  | 43.7      | W                  |
| WNW 6000.                            | 1.47E-06  | 6.72E-07  | 4.55E-07   | 1.95E-07 | 5.78E-08  | 1.31E-08  | 29.2      | WNW                |
| NW 6000.                             | 1.33E-06  | 6.26E-07  | 4.30E-07   | 1.90E-07 | 5.89E-08  | 1.41E-08  | 22.2      | NW                 |
| NNW 6000.                            | 1.20E-06  | 5.62E-07  | 3.84E-07   | 1.68E-07 | 5.15E-08  | 1.21E-08  | 17.7      | NNW                |
| N 6000.                              | 1.27E-06  | 6.39E-07  | 4.52E-07   | 2.14E-07 | 7.29E-08  | 1.95E-08  | 20.0      | N                  |
| NNE 6000.                            | 1.11E-06  | 5.20E-07  | 3.56E-07   | 1.57E-07 | 4.84E-08  | 1.15E-08  | 13.6      | NNE                |
| NE 6000.                             | 1.08E-06  | 4.92E-07  | 3.33E-07   | 1.42E-07 | 4.19E-08  | 9.40E-09  | 13.5      | NE                 |
| ENE 6000.                            | 1.00E-06  | 4.49E-07  | 3.01E-07   | 1.26E-07 | 3.59E-08  | 7.77E-09  | 11.5      | ENE                |
| E 6000.                              | 1.08E-06  | 5.10E-07  | 3.51E-07   | 1.56E-07 | 4.86E-08  | 1.17E-08  | 14.1      | E                  |
| ESE 6000.                            | 9.78E-07  | 4.81E-07  | 3.38E-07   | 1.57E-07 | 5.19E-08  | 1.35E-08  | 14.1      | ESE                |
| SE 6000.                             | 1.18E-06  | 5.91E-07  | 4.19E-07   | 1.98E-07 | 6.79E-08  | 1.83E-08  | 16.0      | SE                 |
| SSE 6000.                            | 1.34E-06  | 6.80E-07  | 4.85E-07   | 2.33E-07 | 8.12E-08  | 2.24E-08  | 22.0      | SSE                |
| MAX X/Q                              | 1.75E-06  |           |            |          |           | TOTAL HOURS AROUND SITE:                        | 720.4     |                    |
| SRP 2.3.4 6000.                      | 1.65E-06  | 8.09E-07  | 5.67E-07   | 2.62E-07 | 8.67E-08  | 2.24E-08  |           |                    |
| SITE LIMIT                           | 1.65E-06  | 8.09E-07  | 5.67E-07   | 2.62E-07 | 8.67E-08  | 2.24E-08  |           |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

X/Q VALUES (SEC/CUBIC METER) FOR FUMIGATION AT THE BOUNDARY:

| DOWNWIND DISTANCE FUMIGATION<br>SECTOR (METERS) | X/Q      |
|---|----------|
| S 6000.   | 8.14E-06 |
| SSW 6000.                                       | 8.14E-06 |
| SW 6000.  | 8.14E-06 |
| WSW 6000.                                       | 8.14E-06 |
| W 6000.   | 8.14E-06 |
| WNW 6000.                                       | 8.14E-06 |
| NW 6000.  | 8.14E-06 |
| NNW 6000.                                       | 8.14E-06 |
| N 6000.   | 8.14E-06 |
| NNE 6000.                                       | 8.14E-06 |
| NE 6000.  | 8.14E-06 |
| ENE 6000.                                       | 8.14E-06 |
| E 6000.   | 8.14E-06 |
| ESE 6000.                                       | 8.14E-06 |



# ATTACHMENT C

|       |       |       |       |       |       |       |        |       |       |       |       |       |       |       |       |       |
|-------|-------|-------|-------|-------|-------|-------|--------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| 27.   | 30.   | 63.   | 55.   | 73.   | 71.   | 94.   | 32.    | 23.   | 17.   | 17.   | 19.   | 16.   | 36.   | 58.   | 43.   |       |
| 110.  | 60.   | 83.   | 93.   | 119.  | 162.  | 213.  | 98.    | 74.   | 39.   | 37.   | 48.   | 67.   | 68.   | 122.  | 90.   |       |
| 120.  | 53.   | 42.   | 39.   | 80.   | 125.  | 219.  | 146.   | 75.   | 39.   | 39.   | 70.   | 95.   | 105.  | 181.  | 120.  |       |
| 93.   | 32.   | 18.   | 21.   | 58.   | 89.   | 97.   | 197.   | 60.   | 17.   | 36.   | 27.   | 87.   | 161.  | 234.  | 126.  |       |
| 60.   | 21.   | 7.    | 6.    | 17.   | 48.   | 45.   | 112.   | 47.   | 15.   | 22.   | 10.   | 55.   | 229.  | 219.  | 152.  |       |
| 45.   | 14.   | 4.    | 1.    | 13.   | 29.   | 32.   | 99.    | 23.   | 7.    | 5.    | 6.    | 64.   | 432.  | 422.  | 237.  |       |
| 7.    | 2.    | 0.    | 0.    | 3.    | 4.    | 6.    | 41.    | 1.    | 0.    | 0.    | 0.    | 6.    | 124.  | 259.  | 111.  |       |
| 3.    | 1.    | 0.    | 0.    | 0.    | 0.    | 1.    | 4.     | 0.    | 0.    | 0.    | 0.    | 1.    | 31.   | 107.  | 43.   |       |
| 65.   | 28.   | 29.   | 24.   | 36.   | 50.   | 69.   | 44.    | 27.   | 27.   | 27.   | 29.   | 32.   | 29.   | 48.   | 78.   |       |
| 40.   | 32.   | 16.   | 32.   | 28.   | 59.   | 86.   | 36.    | 10.   | 18.   | 34.   | 20.   | 33.   | 33.   | 34.   | 83.   |       |
| 38.   | 25.   | 30.   | 35.   | 34.   | 68.   | 127.  | 45.    | 48.   | 30.   | 35.   | 25.   | 45.   | 35.   | 56.   | 59.   |       |
| 87.   | 27.   | 35.   | 50.   | 47.   | 90.   | 171.  | 127.   | 87.   | 16.   | 43.   | 53.   | 73.   | 81.   | 148.  | 71.   |       |
| 97.   | 21.   | 18.   | 22.   | 36.   | 80.   | 143.  | 160.   | 72.   | 23.   | 23.   | 30.   | 63.   | 131.  | 164.  | 70.   |       |
| 71.   | 25.   | 12.   | 8.    | 19.   | 49.   | 84.   | 158.   | 40.   | 4.    | 18.   | 6.    | 22.   | 134.  | 192.  | 90.   |       |
| 39.   | 7.    | 4.    | 1.    | 9.    | 13.   | 16.   | 90.    | 13.   | 2.    | 3.    | 1.    | 11.   | 120.  | 137.  | 74.   |       |
| 29.   | 1.    | 0.    | 2.    | 14.   | 20.   | 18.   | 68.    | 9.    | 1.    | 1.    | 1.    | 2.    | 87.   | 150.  | 70.   |       |
| 2.    | 0.    | 0.    | 0.    | 7.    | 0.    | 0.    | 25.    | 6.    | 0.    | 0.    | 0.    | 0.    | 10.   | 44.   | 20.   |       |
| 0.    | 0.    | 0.    | 0.    | 0.    | 2.    | 1.    | 1.     | 0.    | 0.    | 0.    | 0.    | 0.    | 10.   | 6.    | 3.    |       |
| 64.   | 37.   | 30.   | 19.   | 36.   | 63.   | 88.   | 71.    | 53.   | 21.   | 33.   | 28.   | 61.   | 54.   | 103.  | 102.  |       |
| 27.   | 15.   | 18.   | 23.   | 24.   | 33.   | 80.   | 48.    | 46.   | 30.   | 42.   | 60.   | 60.   | 45.   | 70.   | 74.   |       |
| 29.   | 14.   | 15.   | 6.    | 22.   | 37.   | 93.   | 73.    | 44.   | 21.   | 28.   | 41.   | 65.   | 45.   | 67.   | 58.   |       |
| 53.   | 14.   | 17.   | 11.   | 17.   | 52.   | 111.  | 135.   | 73.   | 17.   | 21.   | 33.   | 53.   | 105.  | 119.  | 69.   |       |
| 28.   | 4.    | 11.   | 8.    | 4.    | 30.   | 70.   | 127.   | 44.   | 15.   | 8.    | 15.   | 25.   | 81.   | 128.  | 60.   |       |
| 14.   | 1.    | 1.    | 1.    | 4.    | 11.   | 20.   | 85.    | 26.   | 5.    | 0.    | 4.    | 5.    | 74.   | 104.  | 46.   |       |
| 2.    | 0.    | 0.    | 1.    | 1.    | 0.    | 1.    | 19.    | 9.    | 0.    | 0.    | 0.    | 2.    | 28.   | 45.   | 19.   |       |
| 0.    | 0.    | 0.    | 1.    | 10.   | 0.    | 0.    | 10.    | 3.    | 0.    | 0.    | 0.    | 0.    | 5.    | 7.    | 9.    |       |
| 0.    | 0.    | 0.    | 0.    | 3.    | 0.    | 0.    | 0.     | 0.    | 0.    | 0.    | 0.    | 1.    | 0.    | 0.    | 2.    |       |
| 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.     | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 2.    | 0.    |       |
| 99.   | 41.   | 38.   | 36.   | 46.   | 74.   | 121.  | 147.   | 179.  | 127.  | 221.  | 290.  | 403.  | 351.  | 423.  | 265.  |       |
| 95.   | 37.   | 25.   | 45.   | 43.   | 59.   | 147.  | 167.   | 178.  | 146.  | 223.  | 304.  | 520.  | 448.  | 491.  | 325.  |       |
| 57.   | 21.   | 27.   | 7.    | 27.   | 52.   | 151.  | 137.   | 121.  | 82.   | 122.  | 218.  | 443.  | 286.  | 303.  | 218.  |       |
| 63.   | 22.   | 9.    | 4.    | 20.   | 54.   | 147.  | 160.   | 102.  | 53.   | 78.   | 125.  | 315.  | 264.  | 346.  | 209.  |       |
| 49.   | 6.    | 4.    | 2.    | 1.    | 28.   | 32.   | 63.    | 29.   | 10.   | 6.    | 16.   | 90.   | 142.  | 191.  | 78.   |       |
| 10.   | 1.    | 1.    | 0.    | 0.    | 4.    | 5.    | 12.    | 12.   | 3.    | 0.    | 1.    | 6.    | 81.   | 90.   | 17.   |       |
| 1.    | 1.    | 2.    | 0.    | 0.    | 0.    | 0.    | 6.     | 4.    | 0.    | 0.    | 2.    | 0.    | 16.   | 21.   | 10.   |       |
| 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 7.     | 3.    | 0.    | 0.    | 0.    | 0.    | 3.    | 6.    | 4.    |       |
| 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 1.     | 2.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    |       |
| 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 1.     | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    | 0.    |       |
| 101.  | 0.50  | 2.35  | 3.47  | 4.59  | 6.82  | 9.06  | 11.313 | 5318. | 0122. | 37    | 55.0  |       |       |       |       |       |
| 0823. | 0823. | 0823. | 0823. | 0823. | 0823. | 0823. | 0823.  | 0823. | 0823. | 0823. | 0823. | 0823. | 0823. | 0823. | 0823. | 0823. |
| -100. | 7300. | 7300. | 7300. | 7300. | 7300. | 7300. | 7300.  | 7300. | 7300. | 7300. | 7300. | 7300. | 7300. | 7300. | 7300. | 7300. |
| 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.     | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    |
| 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.     | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    | 1.    |

# ATTACHMENT C

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USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 05/09/08

PRINTOUT OF INPUT CARDS

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1 00010 01111 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 00000 2 Peach Bottom
Ground Release
3 13.7 meters 10.4-21.1 meters
4
5 PB, 84-88, RG 1.23 R1 wnd cats, 1A met (w/ RT 45' wnd), RB Stack to EAB 6 11 42043 0
7 0.500 2584.000 54.300 10.000 13.700
8 0.000 0.000 1.000 1.000 4.000 4.000 4.000
9 48.000 50.000 50.000 45.000 40.000 42.000 35.000 23.000 28.000 17.000 14.000 25.000 18.000 22.000 18.000 33.000
9 41.000 33.000 31.000 44.000 82.000 90.000 88.000 27.000 30.000 14.000 15.000 8.000 19.000 20.000 14.000 38.000
9 42.000 26.000 26.000 32.000 88.000 99.000 88.000 58.000 18.000 8.000 4.000 0.000 9.000 17.000 24.000 36.000
9 78.000 51.000 47.000 63.000 92.000 184.000 249.000 79.000 39.000 15.000 9.000 9.000 14.000 12.000 105.000 89.000
9 112.000 45.000 26.000 31.000 58.000 83.000 240.000 112.000 64.000 22.000 13.000 12.000 19.000 18.000 146.000 153.000
9 103.000 19.000 17.000 7.000 22.000 26.000 121.000 131.000 77.000 19.000 23.000 20.000 27.000 39.000 151.000 189.000
9 90.000 11.000 2.000 8.000 3.000 10.000 27.000 135.000 50.000 9.000 1.000 4.000 21.000 29.000 160.000 217.000
9 78.000 11.000 4.000 1.000 1.000 9.000 10.000 103.000 44.000 7.000 0.000 1.000 22.000 76.000 267.000 348.000
9 24.000 1.000 1.000 0.000 0.000 2.000 0.000 11.000 0.000 1.000 0.000 0.000 0.000 26.000 131.000 105.000
9 5.000 0.000 0.000 0.000 0.000 0.000 0.000 2.000 0.000 0.000 0.000 0.000 0.000 11.000 72.000 43.000
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9 19.000 16.000 15.000 22.000 22.000 27.000 29.000 11.000 6.000 1.000 2.000 4.000 3.000 7.000 13.000 21.000
9 15.000 10.000 10.000 30.000 44.000 30.000 26.000 8.000 5.000 1.000 3.000 4.000 2.000 8.000 13.000 22.000
9 40.000 18.000 25.000 29.000 62.000 73.000 86.000 39.000 16.000 14.000 10.000 9.000 13.000 12.000 60.000 42.000
9 47.000 28.000 30.000 14.000 28.000 51.000 70.000 41.000 22.000 9.000 19.000 12.000 26.000 21.000 54.000 48.000
9 45.000 10.000 9.000 5.000 20.000 41.000 48.000 41.000 31.000 10.000 23.000 17.000 32.000 51.000 71.000 73.000
9 42.000 9.000 5.000 1.000 6.000 13.000 20.000 48.000 18.000 2.000 6.000 5.000 20.000 44.000 81.000 66.000
9 34.000 0.000 3.000 1.000 0.000 10.000 8.000 26.000 7.000 3.000 3.000 4.000 16.000 112.000 172.000 128.000
9 5.000 0.000 1.000 0.000 0.000 2.000 3.000 7.000 0.000 1.000 0.000 1.000 1.000 55.000 68.000 47.000
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9 34.000 30.000 47.000 36.000 46.000 39.000 62.000 24.000 18.000 8.000 10.000 15.000 16.000 25.000 31.000 28.000
9 27.000 30.000 63.000 55.000 73.000 71.000 94.000 32.000 23.000 17.000 17.000 19.000 16.000 36.000 58.000 43.000
9 110.000 60.000 83.000 93.000 119.000 162.000 213.000 98.000 74.000 39.000 37.000 48.000 67.000 68.000 122.000 90.000
9 120.000 53.000 42.000 39.000 80.000 125.000 219.000 146.000 75.000 39.000 39.000 70.000 95.000 105.000 181.000 120.000
9 93.000 32.000 18.000 21.000 58.000 89.000 97.000 197.000 60.000 17.000 36.000 27.000 87.000 161.000 234.000 126.000
9 60.000 21.000 7.000 6.000 17.000 48.000 45.000 112.000 47.000 15.000 22.000 10.000 55.000 229.000 219.000 152.000
9 45.000 14.000 4.000 1.000 13.000 29.000 32.000 99.000 23.000 7.000 5.000 6.000 64.000 432.000 422.000 237.000
9 7.000 2.000 0.000 0.000 3.000 4.000 6.000 41.000 1.000 0.000 0.000 0.000 6.000 124.000 259.000 111.000
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# ATTACHMENT C

|       |        |        |        |        |        |        |         |         |         |         |         |         |         |         |         |         |        |       |       |       |
|-------|--------|--------|--------|--------|--------|--------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--------|-------|-------|-------|
| 9     | 3.000  | 1.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 1.000   | 4.000   | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 31.000  | 107.000 | 43.000 |       |       |       |
| 9     | 65.000 | 28.000 | 29.000 | 24.000 | 36.000 | 50.000 | 69.000  | 44.000  | 27.000  | 27.000  | 29.000  | 32.000  | 29.000  | 48.000  | 78.000  |         |        |       |       |       |
| 9     | 40.000 | 32.000 | 16.000 | 32.000 | 28.000 | 59.000 | 86.000  | 36.000  | 10.000  | 18.000  | 34.000  | 20.000  | 33.000  | 33.000  | 34.000  | 83.000  |        |       |       |       |
| 9     | 38.000 | 25.000 | 30.000 | 35.000 | 34.000 | 68.000 | 127.000 | 45.000  | 48.000  | 30.000  | 35.000  | 25.000  | 45.000  | 35.000  | 56.000  | 59.000  |        |       |       |       |
| 9     | 87.000 | 27.000 | 35.000 | 50.000 | 47.000 | 90.000 | 171.000 | 127.000 | 87.000  | 16.000  | 43.000  | 53.000  | 73.000  | 81.000  | 148.000 | 71.000  |        |       |       |       |
| 9     | 97.000 | 21.000 | 18.000 | 22.000 | 36.000 | 80.000 | 143.000 | 160.000 | 72.000  | 23.000  | 23.000  | 30.000  | 63.000  | 131.000 | 164.000 | 70.000  |        |       |       |       |
| 9     | 71.000 | 25.000 | 12.000 | 8.000  | 19.000 | 49.000 | 84.000  | 158.000 | 40.000  | 4.000   | 18.000  | 6.000   | 22.000  | 134.000 | 192.000 | 90.000  |        |       |       |       |
| 9     | 39.000 | 7.000  | 4.000  | 1.000  | 9.000  | 13.000 | 16.000  | 90.000  | 13.000  | 2.000   | 3.000   | 1.000   | 11.000  | 120.000 | 137.000 | 74.000  |        |       |       |       |
| 9     | 29.000 | 1.000  | 0.000  | 2.000  | 14.000 | 20.000 | 18.000  | 68.000  | 9.000   | 1.000   | 1.000   | 1.000   | 2.000   | 87.000  | 150.000 | 70.000  |        |       |       |       |
| 9     | 2.000  | 0.000  | 0.000  | 0.000  | 7.000  | 0.000  | 0.000   | 25.000  | 6.000   | 0.000   | 0.000   | 0.000   | 0.000   | 10.000  | 44.000  | 20.000  |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 2.000  | 1.000   | 1.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 10.000  | 6.000   | 3.000   |        |       |       |       |
| 9     | 64.000 | 37.000 | 30.000 | 19.000 | 36.000 | 63.000 | 88.000  | 71.000  | 53.000  | 21.000  | 33.000  | 28.000  | 61.000  | 54.000  | 103.000 | 102.000 |        |       |       |       |
| 9     | 27.000 | 15.000 | 18.000 | 23.000 | 24.000 | 33.000 | 80.000  | 48.000  | 46.000  | 30.000  | 42.000  | 60.000  | 60.000  | 45.000  | 70.000  | 74.000  |        |       |       |       |
| 9     | 29.000 | 14.000 | 15.000 | 6.000  | 22.000 | 37.000 | 93.000  | 73.000  | 44.000  | 21.000  | 28.000  | 41.000  | 65.000  | 45.000  | 67.000  | 58.000  |        |       |       |       |
| 9     | 53.000 | 14.000 | 17.000 | 11.000 | 17.000 | 52.000 | 111.000 | 135.000 | 73.000  | 17.000  | 21.000  | 33.000  | 53.000  | 105.000 | 119.000 | 69.000  |        |       |       |       |
| 9     | 28.000 | 4.000  | 11.000 | 8.000  | 4.000  | 30.000 | 70.000  | 127.000 | 44.000  | 15.000  | 8.000   | 15.000  | 25.000  | 81.000  | 128.000 | 60.000  |        |       |       |       |
| 9     | 14.000 | 1.000  | 1.000  | 1.000  | 4.000  | 11.000 | 20.000  | 85.000  | 26.000  | 5.000   | 0.000   | 4.000   | 5.000   | 74.000  | 104.000 | 46.000  |        |       |       |       |
| 9     | 2.000  | 0.000  | 0.000  | 1.000  | 1.000  | 0.000  | 1.000   | 19.000  | 9.000   | 0.000   | 0.000   | 0.000   | 2.000   | 28.000  | 45.000  | 19.000  |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 1.000  | 10.000 | 0.000  | 0.000   | 10.000  | 3.000   | 0.000   | 0.000   | 0.000   | 0.000   | 5.000   | 7.000   | 9.000   |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 1.000   | 0.000   | 0.000   | 2.000   |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 2.000   | 0.000   |        |       |       |       |
| 9     | 99.000 | 41.000 | 38.000 | 36.000 | 46.000 | 74.000 | 121.000 | 147.000 | 179.000 | 127.000 | 221.000 | 290.000 | 403.000 | 351.000 | 423.000 | 265.000 |        |       |       |       |
| 9     | 95.000 | 37.000 | 25.000 | 45.000 | 43.000 | 59.000 | 147.000 | 167.000 | 178.000 | 146.000 | 223.000 | 304.000 | 520.000 | 448.000 | 491.000 | 325.000 |        |       |       |       |
| 9     | 57.000 | 21.000 | 27.000 | 7.000  | 27.000 | 52.000 | 151.000 | 137.000 | 121.000 | 82.000  | 122.000 | 218.000 | 443.000 | 286.000 | 303.000 | 218.000 |        |       |       |       |
| 9     | 63.000 | 22.000 | 9.000  | 4.000  | 20.000 | 54.000 | 147.000 | 160.000 | 102.000 | 53.000  | 78.000  | 125.000 | 315.000 | 264.000 | 346.000 | 209.000 |        |       |       |       |
| 9     | 49.000 | 6.000  | 4.000  | 2.000  | 1.000  | 28.000 | 32.000  | 63.000  | 29.000  | 10.000  | 6.000   | 16.000  | 90.000  | 142.000 | 191.000 | 78.000  |        |       |       |       |
| 9     | 10.000 | 1.000  | 1.000  | 0.000  | 0.000  | 4.000  | 5.000   | 12.000  | 12.000  | 3.000   | 0.000   | 1.000   | 6.000   | 81.000  | 90.000  | 17.000  |        |       |       |       |
| 9     | 1.000  | 1.000  | 2.000  | 0.000  | 0.000  | 0.000  | 0.000   | 6.000   | 4.000   | 0.000   | 0.000   | 2.000   | 0.000   | 16.000  | 21.000  | 10.000  |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 7.000   | 3.000   | 0.000   | 0.000   | 0.000   | 0.000   | 3.000   | 6.000   | 4.000   |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 1.000   | 2.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 1.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   |        |       |       |       |
| 9     | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000  | 0.000   | 1.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 0.000   | 10     |       |       |       |
| 2.350 | 3.470  | 4.590  | 6.820  | 9.060  | 11.300 | 13.530 | 18.010  | 22.370  | 55.000  | 0.000   | 0.000   | 0.000   | 11      | 823.    | 823.    | 823.    | 823.   | 101.  | 0.500 |       |
| 823.  | 823.   | 823.   | 823.   | 823.   | 823.   | 823.   | 823.    | 823.    | 823.    | 11      | -100.   | 7300.   | 7300.   | 7300.   | 7300.   | 7300.   | 7300.  | 7300. | 7300. | 7300. |
| 7300. | 7300.  | 7300.  | 7300.  | 7300.  | 7300.  | 12     |         | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0    | 1.0   | 1.0   | 1.0   |
| 1.0   | 1.0    | 1.0    |        |        |        |        |         |         |         |         |         |         |         |         |         |         |        |       |       |       |
| 12    | 1.0    | 1.0    | 1.0    | 1.0    | 1.0    | 1.0    | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0     | 1.0    | 1.0   | 1.0   | 1.0   |



# ATTACHMENT C

USNRC COMPUTER CODE-PAVAN, VERSION 2.0

RUN DATE: 05/09/08

PLANT NAME: Peach Bottom

METEOROLOGICAL INSTRUMENTATION

DATA PERIOD:

WIND SENSORS HEIGHT: 13.7 meters

TYPE OF RELEASE: Ground Release

DELTA-T HEIGHTS: 10.4-21.1 meters

SOURCE OF DATA:

COMMENTS: PB, 84-88, RG 1.23 R1 wnd cats, 1A met (w/ RT 45' wnd), RB Stack to EAB

PROGRAM: PAVAN, 10/76, 8/79 REVISION, IMPLEMENTATION OF REGULATORY GUIDE 1.145

## RELATIVE CONCENTRATION (X/Q) VALUES (SEC/CUBIC METER)

| DOWNWIND DISTANCE<br>SECTOR | (METERS) | VERSUS<br>AVERAGING TIME |           |            |          |                          |                | HOURS PER YEAR MAX<br>0-2 HR X/Q IS<br>EXCEEDED |  | DOWNWIND<br>SECTOR |
|-----------------------------|----------|--------------------------|-----------|------------|----------|--------------------------|----------------|---|--|--------------------|
|                             |          | 0-2 HOURS                | 0-8 HOURS | 8-24 HOURS | 1-4 DAYS | 4-30 DAYS                | ANNUAL AVERAGE | IN SECTOR                                       |  |                    |
| S                           | 823.     | 2.67E-04                 | 1.29E-04  | 8.99E-05   | 4.10E-05 | 1.33E-05                 | 3.34E-06       | 10.0  |  | S                  |
| SSW                         | 823.     | 1.44E-04                 | 6.79E-05  | 4.65E-05   | 2.05E-05 | 6.33E-06                 | 1.50E-06       | 319.8   |  | SSW                |
| SW                          | 823.     | 1.25E-04                 | 5.95E-05  | 4.11E-05   | 1.84E-05 | 5.79E-06                 | 1.41E-06       | 3.8   |  | SW                 |
| WSW                         | 823.     | 1.16E-04                 | 5.58E-05  | 3.87E-05   | 1.76E-05 | 5.63E-06                 | 1.40E-06       | 3.6   |  | WSW                |
| W                           | 823.     | 1.57E-04                 | 7.59E-05  | 5.27E-05   | 2.39E-05 | 7.68E-06                 | 1.91E-06       | 4.6   |  | W                  |
| WNW                         | 823.     | 2.35E-04                 | 1.14E-04  | 7.98E-05   | 3.66E-05 | 1.19E-05                 | 3.03E-06       | 7.4   |  | WNW                |
| NW                          | 823.     | 3.00E-04                 | 1.53E-04  | 1.10E-04   | 5.30E-05 | 1.86E-05                 | 5.19E-06       | 12.2  |  | NW                 |
| NNW                         | 823.     | 3.19E-04                 | 1.60E-04  | 1.14E-04   | 5.37E-05 | 1.84E-05                 | 4.94E-06       | 14.9  |  | NNW                |
| N                           | 823.     | 3.39E-04                 | 1.63E-04  | 1.13E-04   | 5.13E-05 | 1.64E-05                 | 4.08E-06       | 18.1  |  | N                  |
| NNE                         | 823.     | 2.88E-04                 | 1.32E-04  | 8.95E-05   | 3.85E-05 | 1.14E-05                 | 2.60E-06       | 12.8  |  | NNE                |
| NE                          | 823.     | 3.72E-04                 | 1.76E-04  | 1.21E-04   | 5.38E-05 | 1.68E-05                 | 4.03E-06       | 22.5  |  | NE                 |
| ENE                         | 823.     | 4.03E-04                 | 1.97E-04  | 1.38E-04   | 6.37E-05 | 2.09E-05                 | 5.37E-06       | 29.7  |  | ENE                |
| E                           | 823.     | 4.45E-04                 | 2.32E-04  | 1.68E-04   | 8.30E-05 | 3.02E-05                 | 8.76E-06       | 41.6  |  | E                  |
| ESE                         | 823.     | 4.27E-04                 | 2.22E-04  | 1.60E-04   | 7.89E-05 | 2.85E-05                 | 8.21E-06       | 36.1  |  | ESE                |
| SE                          | 823.     | 4.51E-04                 | 2.42E-04  | 1.77E-04   | 8.97E-05 | 3.39E-05                 | 1.03E-05       | 43.7  |  | SE                 |
| SSE                         | 823.     | 3.93E-04                 | 2.03E-04  | 1.46E-04   | 7.09E-05 | 2.53E-05                 | 7.16E-06       | 27.1  |  | SSE                |
| MAX X/Q                     |          | 4.51E-04                 |           |            |          | TOTAL HOURS AROUND SITE: | 607.7          |   |  |                    |
| SRP 2.3.4                   | 823.     | 7.98E-04                 | 3.89E-04  | 2.71E-04   | 1.24E-04 | 4.06E-05                 | 1.03E-05       |   |  |                    |
| SITE LIMIT                  |          | 4.08E-04                 | 2.22E-04  | 1.64E-04   | 8.47E-05 | 3.28E-05                 | 1.03E-05       |   |  |                    |

THE FIVE-PERCENT-FOR-THE-ENTIRE-SITE X/Q IS LIMITING.

\*\*NOTE\*\*: VALUES ON THIS PAGE ARE APPROXIMATIONS ONLY.  
CHECK THE REASONABLENESS OF THE ENVELOPES  
COMPUTED FOR THE 0-2 HOUR VALUES. FOR ANY  
FAULTY ENVELOPES, ADJUST THE ABOVE VALUES.



**Design Analysis Major Revision Cover Sheet**

|  |   |                          |                     |
|--|---|--------------------------|---------------------|
| <b>Design Analysis (Major Revision)</b>  |   | Last Page No. ' B1       |                     |
| <b>Analysis No.:</b> ' PM-1058   | <b>Revision:</b> ' 1                                |                          |                     |
| <b>Title:</b> ' Reanalysis of Main Steam Line Break (MSLB) Accident Using Alternate Source Terms   |   |                          |                     |
| <b>EC/ECR No.:</b> ' PB 07-00027   | <b>Revision:</b> ' 1                                |                          |                     |
| <b>Station(s):</b> ' Peach Bottom Atomic Power Station   | <b>Component(s):</b> ' 4                            |                          |                     |
| <b>Unit No.:</b> ' 2 and 3   | N/A   |                          |                     |
| <b>Discipline:</b> ' SEAQ  |   |                          |                     |
| <b>Descrip. Code/Keyword:</b> ' MSLB   |   |                          |                     |
| <b>Safety/QA Class:</b> ' S  |   |                          |                     |
| <b>System Code:</b> ' 912  |   |                          |                     |
| <b>Structure:</b> ' N/A  |   |                          |                     |
| <b>CONTROLLED DOCUMENT REFERENCES</b> "  |   |                          |                     |
| <b>Document No.:</b>   | <b>From/To</b>                                      | <b>Document No.:</b>     | <b>From/To</b>      |
| Calc. PM-740, rev. 1A  | From  |                          |                     |
| UFSAR; Section 14.6.5, rev 18  | From / To   |                          |                     |
| Calc. PM-738, Rev A  | From  |                          |                     |
| <b>Is this Design Analysis Safeguards Information?</b> " Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, see SY-AA-101-106<br><b>Does this Design Analysis contain Unverified Assumptions?</b> " Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, ATI/AR#: _____<br><b>This Design Analysis SUPERCEDES:</b> " Analysis No. PM-1058, Revision 0 in its entirety. |   |                          |                     |
| <b>Description of Revision (list affected pages for partials):</b> "   |   |                          |                     |
| Minor Correction in EAB Atmospheric Dispersion coefficient incorporated, resulting in a minor change to the resulting EAB dose results.  |   |                          |                     |
| <b>Preparer:</b> " Harold Rothstein  | <i>Harold Rothstein</i>                             | <i>5/19/09</i>           |                     |
|  | <small>Print Name</small>                           | <small>Sign Name</small> | <small>Date</small> |
| <b>Method of Review:</b> " Detailed Review <input checked="" type="checkbox"/> Alternate Calculations (attached) <input type="checkbox"/> Testing <input type="checkbox"/>   |   |                          |                     |
| <b>Reviewer:</b> " Paul Reichert   | <i>Paul Reichert</i>                                | <i>5/19/08</i>           |                     |
|  | <small>Print Name</small>                           | <small>Sign Name</small> | <small>Date</small> |
| <b>Review Notes:</b> " Independent review <input type="checkbox"/> Peer review <input type="checkbox"/>  |   |                          |                     |
| <small>(For External Analyses Only)</small>  |   |                          |                     |
| <b>External Approver:</b> " Harold Rothstein   | <i>Harold Rothstein</i>                             | <i>5/19/08</i>           |                     |
|  | <small>Print Name</small>                           | <small>Sign Name</small> | <small>Date</small> |
| <b>Exelon Reviewer:</b> " T. J. Misosz   | <i>T. J. Misosz</i>                                 | <i>5/19/08</i>           |                     |
|  | <small>Print Name</small>                           | <small>Sign Name</small> | <small>Date</small> |
| <b>Independent 3<sup>rd</sup> Party Review Req'd?</b> " Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  | Previously had review. This is only a minor change. |                          |                     |
| <b>Exelon Approver:</b> " James Jordan   | <i>James Jordan</i>                                 | <i>5/22/08</i>           |                     |
|  | <small>Print Name</small>                           | <small>Sign Name</small> | <small>Date</small> |

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Attachments:

- A. Spreadsheet performing MSLB Dose Assessment [pages A1-A6]
- B. Computer Disclosure Sheet [pages B1-B1]

## 1.0 PURPOSE/OBJECTIVE

The purpose of this calculation is to determine the Control Room (CR), Exclusion Area Boundary (EAB), and Low Population Zone (LPZ) doses following a Main Steam Line Break (MSLB) Accident based on the assumptions on the break and resulting radiological releases to the Turbine Building as discussed in UFSAR [Reference 1] Sections 14.6.5 and 14.9.2.3, and the additional assumptions for use of Alternative Source Terms (AST) contained in Appendix D of Regulatory Guide (R. G.) 1.183 [Reference 6].

Inhalation Committed Effective Dose Equivalent (CEDE) Dose Conversion Factors (DCFs) from Federal Guidance Report No. 11 [Ref. 3] are used for calculation of normalized Iodine-131 Dose Equivalent activity in this calculation.

As per UFSAR Section 14.6.5, this event involves the postulation that one main steam line instantaneously and circumferentially breaks outside the secondary containment at a location downstream of the outermost isolation valve. Closure of the Main Steam Isolation Valves (MSIVs) terminates the mass loss when the full closure is reached. No operator actions are assumed to be taken during the accident, so the normal air intake into the Control Room continues unfiltered during the duration of the event.

The mass of coolant released during the MSLB was obtained from reference 1, which bases analysis on 10.5-second closure of main steam isolation valve. Specifically, as per UFSAR Section 14.9.1.5 and the Reference 2 MSLB Calculation for Power Rerate, a release of 165,120 pounds of reactor water and 25,800 pounds of steam is used.

## 2.0 METHODOLOGY AND ACCEPTANCE CRITERIA

### 2.1 *General Description*

The radiological consequences resulting from a design basis MSLB accident to a person at the EAB; to a person at the LPZ; and to an operator in the Control Room following an MSLB accident were performed using a Microsoft EXCEL spreadsheet, provided as Attachment A.

### 2.2 *Source Term Model*

No fuel damage is expected to result from a MSLB. Therefore, the activity available for release from the break is that present in the reactor coolant and steam lines prior to the break, with two cases analyzed, corresponding to the Reactor Coolant System Specific Activity limits in Technical Specification 3.4.6 and its Basis. Case 1 is for continued full power operation with a maximum equilibrium coolant concentration of 0.2 uCi/gm dose equivalent I-131. Case 2 is for a maximum coolant concentration of 4.0 uCi/gm dose equivalent I-131, based on a pre-accident iodine spike caused by power changes. In determining I-131 equivalence, inhalation CEDE DCFs from Ref. 3 are used. This accident source term basis meets the guidance in R.G. 1.183 for analysis of this event.

### 2.3 *Release Model*

The release model is identical to that historically used. The previously determined mass of reactor coolant release and mass of steam release, before the break is isolated by MSIV closure, are used. Reactor coolant radioactivity is based on the above reactor coolant concentrations.

Releases are assumed to be instantaneous and no credit is taken for dilution in turbine building air.

### 2.4 *Dispersion Model*

Offsite and Onsite X/Q determinations are handled differently, but conservatively in both cases.

#### 2.4.1 EAB and LPZ

EAB and LPZ X/Q's are determined using the original methodology in R.G. 1.5 [Ref. 5]. Specifically:

$$\frac{\chi}{Q} = \frac{0.0133}{\sigma_y u}$$

where

$\sigma_y$  = horizontal standard deviation of the plume (meters)

$u$  = wind velocity (meters/second)

Horizontal standard deviations are taken from the PAVAN outputs for the EAB and LPZ included in Calculation PM-1055 [Ref. 9]. Per Regulatory Guide 1.5, F stability and a 1 meter/sec wind speed are used.

#### 2.4.2 Control Room

For control room dose calculations, the plume was modeled as a hemispherical volume, the dimensions of which are determined based on the initial steam blowdown and that portion of the liquid reactor coolant release that flashed to steam.

Activity release is conservatively assumed to effectively occur at the Control Room intake elevation and, again conservatively, no credit is taken for plume buoyancy. A conservative translation time of the plume over the intake is assumed.

The activity of the cloud is based on the total mass of water released from the break, not just the portion that flashes to steam. This assumption is conservative because it considers the maximum release of fission products.

## 2.5 Dose Model

Dose models for both onsite and offsite are simplified and meet R.G. 1.183 [Ref. 6] requirements, providing results in units of Total Effective Dose Equivalent (TEDE). Dose conversion factors are based on Federal Guidance Reports 11 and 12 [Refs 3 & 4].

### 2.5.1 EAB and LPZ

Doses at the EAB and LPZ for the MSLB are based on the following formulas:

$$\text{Dose}_{\text{CEDE}} (\text{rem}) = \text{Release (Curies)} * \frac{\lambda}{Q} (\text{sec}/\text{m}^3) * \text{Breathing Rate (m}^3/\text{sec)} * \text{Inhalation DCF (rem}_{\text{CEDE}}/\text{Ci inhaled)}$$

and

$$\text{Dose}_{\text{EDE}} (\text{rem}) = \text{Release (Curies)} * \frac{\lambda}{Q} (\text{sec}/\text{m}^3) * \text{Submersion DCF (rem}_{\text{EDE}} - \text{m}^3/\text{Ci} - \text{sec)}$$

and finally,

$$\text{Dose}_{\text{TEDE}} (\text{rem}) = \text{Dose}_{\text{CEDE}} (\text{rem}) + \text{Dose}_{\text{EDE}} (\text{rem})$$

### 2.5.2 Control Room

CR operator doses are determined somewhat differently, because steam cloud concentrations are used, rather than  $\lambda/Q$  times a curie release rate. No CR filter credit is taken and, therefore, for inhalation, a dose for a location outside of the CR can be and is used. For cloud submersion, a geometry factor is used to credit the reduced plume size seen in the control room. This is a conservative implementation of RG 1.183 guidance. The formulas used are:

$$\text{Dose}_{\text{CEDE}} (\text{rem}) = \text{Plume Concentration (Ci}/\text{m}^3) * \text{Transit Duration (sec)} * \text{Breathing Rate (m}^3/\text{sec)} * \text{Inhalation DCF (rem}_{\text{CEDE}}/\text{Ci inhaled)}$$

and

$$\text{Dose}_{\text{EDE}} (\text{rem}) = \text{Plume Concentration (Ci}/\text{m}^3) * \text{Transit Duration (sec)} * \text{Submersion DCF (rem}_{\text{EDE}} - \text{m}^3/\text{Ci} - \text{sec)}$$

and finally,

$$\text{Dose}_{\text{TEDE}} (\text{rem}) = \text{Dose}_{\text{CEDE}} (\text{rem}) + \text{Dose}_{\text{EDE}} (\text{rem})$$

## 2.6 Acceptance Criteria

Dose acceptance criteria are per 10CFR50.67 [Ref. 7] and R.G. 1.183 [Ref. 6] guidance.

Table 1 lists the regulatory limits for accidental dose to 1) a control room operator, 2) a person at the EAB, and 3) a person at the LPZ boundary.

Table 1. Regulatory Dose Limits (Rem TEDE) per Refs. 7 and 6.

| I-131 Dose Equivalent | CR<br>(30 days) | EAB<br>(2 hours) | LPZ<br>(30 days) |
|-----------------------|-----------------|------------------|------------------|
| Normal Equilibrium    | 5               | 2.5              | 2.5              |
| Iodine Spike          | 5               | 25               | 25               |



### 3.0 ASSUMPTIONS

#### 3.1 *Activity Release and Transport Models*

- Iodine activity distribution in the coolant is taken from UFSAR [Ref. 1] Section 14.6.5.2.1, assumption 2.
- Total release quantities from the break are taken from UFSAR [Ref. 1] Section 14.9.1.5, with Section 14.6.5 break flow and MSIV closure characteristics, including the conservative 10-second valve closure time in comparison to the less than or equal to 5 seconds isolation time limit of Surveillance Requirement 3.6.1.3.9 [Ref. 8].
- Release from the break to the environment is assumed instantaneous. No holdup in the Turbine Building or dilution by mixing with Turbine Building air volume is credited.
- The steam cloud is assumed to consist of the initial steam blowdown and that portion of the liquid reactor coolant release that flashed to steam.
- The activity of the cloud is based on the total mass of water released from the break, not just the portion that flashes to steam. This assumption is conservative because it considers the maximum release of fission products.
- The fraction of liquid water contained in steam, which carries activity into the cloud, is assumed to be 2%, a conservatively high value consistent with current Boiling Water Reactor practice.
- A conservatively high flashing fraction of liquid water released of 40% is assumed. However, all activity in the water is assumed to be released.
- For offsite dose calculations, the release is treated per Regulatory Guide 1.5 [Ref. 5]. Buoyancy effect of the cloud was conservatively ignored.
- For the control room dose calculations,
  - the plume is modeled as a hemispherical volume. This is consistent with the assumption of no Turbine Building credit. It is also reasonable for the more likely release paths through multiple large openings above the Turbine Building operating deck.
  - dispersion of the activity of the plume is conservatively ignored.
  - The cloud is assumed to be carried away by a wind of speed 1 m/s. Credit is not taken for decay.

#### 3.2 *Control Room Model*

- No credit is taken for the operation of the control room emergency filtration systems during the MSLB.
- Inhalation doses are determined based on concentrations at the intake, and exposures for the duration of plume traverse.
- External exposure doses are determined based on concentrations at the intake, exposures for the duration of plume traverse, and a geometry factor credit based on the control room envelope volume of 176,000 cubic feet.

#### 3.3 *Site Boundary Model*

This model is as discussed in Subsection 2.5 above.

## 4.0 DESIGN INPUT

### 4.1 Mass Release Data

- The mass of steam released is 25,800 lb. [Section 14.9.1.5 of Ref. 1 and Ref. 2]
- The mass of liquid water released is 165,120 lb. [Section 14.9.1.5 of Ref. 1 and Ref. 2]

### 4.2 Iodine Distribution

The PBAPS UFSAR [Ref. 1] Section 14.6.5.2.1 provides the following design basis concentrations of significant radionuclides contained in the coolant:

| <u>Iodine Isotope</u> | <u>Activity (<math>\mu\text{Ci/cc}</math>)</u> |
|-----------------------|--|
| I-131                 | 0.17   |
| I-132                 | 1.02   |
| I-133                 | 1.04   |
| I-134                 | 1.47   |
| I-135                 | 1.30   |

### 4.3 Noble Gas Distribution

The MSLB Power Rerate Calculation [Ref. 2] provides the following Noble Gas concentrations for potentially significant radionuclides contained in the coolant:

| Noble Gas      | Concentration                      |
|----------------|------------------------------------|
| <u>Isotope</u> | <u><math>\mu\text{Ci/g}</math></u> |
| Kr-83M         | 1.92E-03                           |
| Kr-85M         | 3.44E-03                           |
| Kr-85          | 1.13E-05                           |
| Kr-87          | 1.13E-02                           |
| Kr-88          | 1.13E-02                           |
| Kr-89          | 7.33E-02                           |
| Xe-131M        | 8.46E-06                           |
| Xe-133M        | 1.63E-04                           |
| Xe-133         | 4.62E-03                           |
| Xe-135M        | 1.47E-02                           |
| Xe-135         | 1.24E-02                           |
| Xe-137         | 8.46E-02                           |
| Xe-138         | 5.02E-02                           |

#### 4.4 **Control Room Data**

- Control Room Envelope = 176,000 ft<sup>3</sup>. [Ref. 10]
- No Emergency Filtration Credit taken.

#### 4.5 **EAB and LPZ Data**

- EAB Distance from Release, m 823 [Ref. 1]
- LPZ Distance from Release, m 7300 [Ref. 1]

## 5.0 REFERENCES

1. PBAPS UFSAR, Rev. 18.
2. PBAPS Calculation PM-740, Rev. 1A, "Power Rerate MSLB Dose Verification and Rerated Doses".
3. Federal Guidance Report No. 11, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion", 1988.
4. Federal Guidance Report No. 12, "External Exposure to Radionuclides in Air, Water, and Soil", 1993.
5. Regulatory Guides 1.5, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Steam Line Break Accidents for Boiling Water Reactors," 3/10/71.
6. Regulatory Guide 1.183, "Alternative Radiological Source Terms For Evaluating Design Basis Accidents At Nuclear Power Reactors", July 2000.
7. 10 CFR Part 50.67, "Accident Source Term".
8. PBAPS Technical Specification 3.6.1.3, "Primary Containment Isolation Valves", Surveillance Requirement 3.6.1.3.9.
9. Design Analysis No. PM-1055, Rev. 0 "Calculation of Alternative Source Terms Onsite and Offsite X/Q Values".
10. PBAPS Calculation PM-738, Rev. A, "Power Rerate Control Rod Drop Dose Verification and Rerated Doses".

## 6.0 CALCULATIONS

No or minimal fuel damage is expected for the limiting MSLB. As discussed in section 2, two iodine concentrations will be used (0.2  $\mu\text{Ci/g}$  and 4.0  $\mu\text{Ci/g}$ ) [per Refs. 6 and 8] when determining the consequences of the main steam line break. All of the radioactivity in the released coolant is assumed to be released to the atmosphere instantaneously as a ground-level release. No credit is taken for plateout, holdup, or dilution within facility buildings.

The spreadsheets in Attachment A perform this analysis using data and formulations discussed above. The following summarizes parameters and their treatment in the spreadsheet.

### 6.1 *Cloud Volumes, Masses, and Control Room Intake Transit Times*

As stated in Section 3.1, the cloud is assumed to consist of the initial steam blowdown and that portion of the liquid reactor coolant release that flashes to steam. The flashing fraction (FF) is derived as follows:

$$\text{FF} \times (\text{steam enthalpy at 212 F}) + (1-\text{FF}) \times (\text{liquid enthalpy at 212 F}) = (\text{liquid enthalpy at temperature of steam at reactor vessel outlet})$$

A 548 F vessel outlet temperature is used, with liquid enthalpy of 546.9 BTU/lb. At 212 F, a steam enthalpy of 1150.5 BTU/lb and a liquid enthalpy of 180.17 BTU/lb are used (these enthalpies are taken from the ASME Steam Tables).

Substituting,

$$\text{FF} = (546.9 - 180.17) / [(1150.5 - 180.17)] = .378$$

For conservatism, a value of .40 or 40% is used below.

Mass of water carrying activity into the cloud is calculated as the sum of the fraction of water in the steam and the liquid blowdown.

|  |                                   |
|--|-----------------------------------|
| The mass steam released                            | = 25,800 lb                       |
| The mass liquid water released                     | = 165,120 lb                      |
| Flashing fraction for calculating cloud volume     | = 40%                             |
| The mass water contained in steam released         | = (25,800 lb) * 2%                |
|  | = 516 lb                          |
| The mass of water carrying activity into the cloud | = 516 + 165,120 lb                |
|  | = 165,636 lb                      |
|  | = (165,636 lb)(453.59 g/lb)       |
|  | = 7.5131E7 g                      |
| The mass of steam in the cloud                     | = (25,800 - 516) + 40%*165,120 lb |
|  | = 25,284 + 66,048                 |
|  | = 91,332 lb                       |

The release is assumed to be a hemisphere with a uniform concentration. The cloud dimensions (based on 91,332 lb of steam at 14.7 psi and 212 °F,  $v_g = 26.799 \text{ ft}^3/\text{lb}$ ) are calculated as follows:

$$\begin{aligned} \text{Volume} &= (91,332 \text{ lb})(26.799 \text{ ft}^3/\text{lb}) \\ &= 2,447,600 \text{ ft}^3 \\ &= (2,447,600 \text{ ft}^3)/(35.3 \text{ ft}^3/\text{m}^3) \\ &= 69,337 \text{ m}^3 \end{aligned}$$

The volume of a hemisphere is  $\pi d^3 / 12$ . Thus, the diameter of the hemispherical cloud is 64.2 meters.

The period of time required for the cloud to pass over the control room intake, assuming a wind speed of 1 m/s is 64.2 s ( $= (64.2 \text{ m}) / (1 \text{ m/s})$ ).

Therefore, at a wind speed of 1 m/s, the base of the hemispherical cloud will pass over the control room intake in 64.2 seconds.

## 6.2 Dispersion for Offsite Dose Assessment

As discussed in Section 2.4.2 the following formulation was used for Offsite Dose X/Q assessment, with F Pasquill Stability and a 1 m/sec wind speed.

$$\frac{\chi}{Q} = \frac{0.0133}{\sigma_y u}$$

where

$\sigma_y$  = horizontal standard deviation of the plume (meters)

$u$  = wind velocity (meters/second)

As calculated in the PAVAN run in Reference 9, at the 823 meter EAB distance  $\sigma_y$  is 31.0, and at the 7300 meter LPZ distance  $\sigma_y$  is 222.6. The resulting EAB and LPZ X/Qs are 4.29E-04 and 5.97E-05 sec/m<sup>3</sup>, respectively.

## 6.3 Release Isotopics and Quantification

The iodine isotopic distribution given in Section 4.2 is used. The concentrations of this mix are adjusted to I-131 equivalence, using the inhalation Committed Effective Dose Equivalent (CEDE) Dose Conversion Factors (DCFs) from Federal Guidance Report No. 11 [Ref. 3]. This is a more conservative set of DCF assumptions for Control Room and off-site dose calculation than the use of ICRP 2 DCFs. It is also more conservative for these calculations than use of R. G. 1.109 or Federal Guidance Report No. 12 [Ref. 4] DCFs.

This I-131 equivalent mix is adjusted to the activity yielding the two design basis MSLB accident reactor coolant activities of 0.2  $\mu\text{Ci}/\text{cc}$  and 4.0  $\mu\text{Ci}/\text{cc}$ . The released activities are these concentrations times the 7.51E+07 grams of water carrying activity released, with the assumption that TS activities are based on laboratory temperature and pressure conditions.

For the Noble Gases, the isotopic distribution given in Section 4.3 is used. The released activities are these concentrations times the 25,800 lb mass of steam released, converted to  $1.17\text{E}+07$  grams using the 453.59 g/lb conversion factor.

#### 6.4 *Dose Assessment*

Doses at the EAB and LPZ distances, and in the Control Room are calculated in Attachment A using the formulas in Section 2.5. Concentrations at the receptor locations are that in the steam plume for the Control Room or based on the release times the applicable X/Q for the EAB and LPZ.

Doses are calculated for inhalation (rem CEDE) and plume submersion (rem EDE) and totaled to yield rem TEDE. The breathing rate of  $3.47\text{E}-04$  m<sup>3</sup>/sec is per RG 1.183 guidance without the round-off.

The resulting calculated doses are in the spreadsheet and in the Summary and Conclusions Section below.

## 7.0 SUMMARY AND CONCLUSIONS

- Accidental doses from a design basis MSLB were calculated for the control room operator, a person at EAB, and a person at LPZ. The results are summarized in the Table below. The doses at the Control Room, EAB, and LPZ resulting from a postulated design basis MSLB do not exceed, and are a small fraction of, the regulatory limits.

| Location      | Case 1<br>(normal equilibrium<br>limit of 0.2 $\mu$ Ci)<br>Dose (rem TEDE) | Case 2<br>(iodine spike<br>limit of 4.0 $\mu$ Ci)<br>Dose (rem TEDE) |
|---------------|--|--|
| <b>LIMITS</b> | CR: 5.0; EAB&LPZ: 2.5  | CR: 5.0; EAB&LPZ: 25   |
| <b>EAB</b>    | 9.88E-02   | 1.97E+00   |
| <b>LPZ</b>    | 1.38E-02   | 2.75E-01   |
| <b>CR</b>     | 1.62E-01   | 3.23 E+00  |



### 8.0 Owners Acceptance Review Checklist for External Design Analysis

Page 1 of 1

DESIGN ANALYSIS NO. PM-1058 REV: 1

|     |  | Yes                                 | No                                  | N/A                                 |
|-----|--|-------------------------------------|-------------------------------------|-------------------------------------|
| 1.  | Do assumptions have sufficient rationale?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 2.  | Are assumptions compatible with the way the plant is operated and with the licensing basis? <i>(For AST)</i>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 3.  | Do the design inputs have sufficient rationale?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 4.  | Are design inputs correct and reasonable?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 5.  | Are design inputs compatible with the way the plant is operated and with the licensing basis? <i>(For AST)</i>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 6.  | Are Engineering Judgments clearly documented and justified?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 7.  | Are Engineering Judgments compatible with the way the plant is operated and with the licensing basis?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 8.  | Do the results and conclusions satisfy the purpose and objective of the Design Analysis?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 9.  | Are the results and conclusions compatible with the way the plant is operated and with the licensing basis? <i>(For AST)</i>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 10. | Does the Design Analysis include the applicable design basis documentation?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 11. | Have any limitations on the use of the results been identified and transmitted to the appropriate organizations?   | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 12. | Are there any unverified assumptions?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 13. | Do all unverified assumptions have a tracking and closure mechanism in place?  | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 14. | Have all affected design analyses been documented on the Affected Documents List (ADL) for the associated Configuration Change?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 15. | Do the sources of inputs and analysis methodology used meet current technical requirements and regulatory commitments? (If the input sources or analysis methodology are based on an out-of-date methodology or code, additional reconciliation may be required if the site has since committed to a more recent code) <i>(AST per RA 1.103)</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 16. | Have vendor supporting technical documents and references (including GE DRFs) been reviewed when necessary?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |

EXELON REVIEWER: T.J. McEiszewski DATE: 5/19/2008  
Print / Sign



|    | A  | B                  | C        | D                | E        | F                      | G        | H        | I                      | J        | K |
|----|--|--------------------|----------|------------------|----------|------------------------|----------|----------|------------------------|----------|---|
| 45 | Inhalation Doses   |                    |          |                  |          |                        |          |          |                        |          |   |
| 46 |  | Curies Released    |          |                  |          | Case 1 Dose (rem CEDE) |          |          | Case 2 Dose (rem CEDE) |          |   |
| 47 |  | to the Environment |          |                  |          | (Inhalation)           |          |          | (Inhalation)           |          |   |
| 48 | Isotope  | Case 1             | Case 2   | DCF <sup>1</sup> | CR       | EAB                    | LPZ      | CR       | EAB                    | LPZ      |   |
| 49 | I-131  | 6.07E+00           | 1.21E+02 | 3.29E+04         | 6.41E-02 | 2.97E-02               | 4.14E-03 | 1.28E+00 | 5.94E-01               | 8.28E-02 |   |
| 50 | I-132  | 3.64E+01           | 7.28E+02 | 3.81E+02         | 4.46E-03 | 2.06E-03               | 2.88E-04 | 8.91E-02 | 4.13E-02               | 5.75E-03 |   |
| 51 | I-133  | 3.71E+01           | 7.42E+02 | 5.85E+03         | 6.97E-02 | 3.23E-02               | 4.50E-03 | 1.39E+00 | 6.46E-01               | 9.00E-02 |   |
| 52 | I-134  | 5.25E+01           | 1.05E+03 | 1.31E+02         | 2.21E-03 | 1.02E-03               | 1.42E-04 | 4.42E-02 | 2.05E-02               | 2.85E-03 |   |
| 53 | I-135  | 4.64E+01           | 9.28E+02 | 1.23E+03         | 1.83E-02 | 8.50E-03               | 1.18E-03 | 3.67E-01 | 1.70E-01               | 2.37E-02 |   |
| 54 |  |                    |          | Totals           | 1.59E-01 | 7.36E-02               | 1.02E-02 | 3.18E+00 | 1.47E+00               | 2.05E-01 |   |
| 55 |  |                    |          |                  |          |                        |          |          |                        |          |   |
| 56 | External Doses   |                    |          |                  |          |                        |          |          |                        |          |   |
| 57 |  | Curies Released    |          |                  |          | Case 1 Dose (rem EDE)  |          |          | Case 2 Dose (rem EDE)  |          |   |
| 58 |  | to the Environment |          |                  |          | (External)             |          |          | (External)             |          |   |
| 59 | Isotope  | Case 1             | Case 2   | DCF <sup>2</sup> | CR       | EAB                    | LPZ      | CR       | EAB                    | LPZ      |   |
| 60 | I-131  | 6.07E+00           | 1.21E+02 | 6.73E-02         | 1.91E-05 | 1.75E-04               | 2.44E-05 | 3.82E-04 | 3.51E-03               | 4.88E-04 |   |
| 61 | I-132  | 3.64E+01           | 7.28E+02 | 4.14E-01         | 7.06E-04 | 6.47E-03               | 9.01E-04 | 1.41E-02 | 1.29E-01               | 1.80E-02 |   |
| 62 | I-133  | 3.71E+01           | 7.42E+02 | 1.09E-01         | 1.89E-04 | 1.73E-03               | 2.41E-04 | 3.78E-03 | 3.46E-02               | 4.82E-03 |   |
| 63 | I-134  | 5.25E+01           | 1.05E+03 | 4.81E-01         | 1.18E-03 | 1.08E-02               | 1.51E-03 | 2.36E-02 | 2.17E-01               | 3.02E-02 |   |
| 64 | I-135  | 4.64E+01           | 9.28E+02 | 2.95E-01         | 6.41E-04 | 5.88E-03               | 8.18E-04 | 1.28E-02 | 1.18E-01               | 1.64E-02 |   |
| 65 | Kr-83M   | 2.25E-02           | 2.25E-02 | 5.55E-06         | 5.84E-12 | 5.35E-11               | 7.45E-12 | 5.84E-12 | 5.35E-11               | 7.45E-12 |   |
| 66 | Kr-85M   | 4.03E-02           | 4.03E-02 | 2.77E-02         | 5.21E-08 | 4.78E-07               | 6.66E-08 | 5.21E-08 | 4.78E-07               | 6.66E-08 |   |
| 67 | Kr-85  | 1.32E-04           | 1.32E-04 | 4.40E-04         | 2.72E-12 | 2.50E-11               | 3.48E-12 | 2.72E-12 | 2.50E-11               | 3.48E-12 |   |
| 68 | Kr-87  | 1.32E-01           | 1.32E-01 | 1.52E-01         | 9.43E-07 | 8.65E-06               | 1.20E-06 | 9.43E-07 | 8.65E-06               | 1.20E-06 |   |
| 69 | Kr-88  | 1.32E-01           | 1.32E-01 | 3.77E-01         | 2.34E-06 | 2.14E-05               | 2.98E-06 | 2.34E-06 | 2.14E-05               | 2.98E-06 |   |
| 70 | Kr-89  | 8.58E-01           | 8.58E-01 | 0.00E+00         | 0.00E+00 | 0.00E+00               | 0.00E+00 | 0.00E+00 | 0.00E+00               | 0.00E+00 |   |
| 71 | Xe-131M  | 9.90E-05           | 9.90E-05 | 1.44E-03         | 6.67E-12 | 6.11E-11               | 8.51E-12 | 6.67E-12 | 6.11E-11               | 8.51E-12 |   |
| 72 | Xe-133M  | 1.91E-03           | 1.91E-03 | 5.07E-03         | 4.53E-10 | 4.15E-09               | 5.78E-10 | 4.53E-10 | 4.15E-09               | 5.78E-10 |   |
| 73 | Xe-133   | 5.41E-02           | 5.41E-02 | 5.77E-03         | 1.46E-08 | 1.34E-07               | 1.86E-08 | 1.46E-08 | 1.34E-07               | 1.86E-08 |   |
| 74 | Xe-135M  | 1.72E-01           | 1.72E-01 | 7.55E-02         | 6.08E-07 | 5.57E-06               | 7.76E-07 | 6.08E-07 | 5.57E-06               | 7.76E-07 |   |
| 75 | Xe-135   | 1.45E-01           | 1.45E-01 | 4.40E-02         | 2.99E-07 | 2.74E-06               | 3.82E-07 | 2.99E-07 | 2.74E-06               | 3.82E-07 |   |
| 76 | Xe-137   | 9.90E-01           | 9.90E-01 | 0.00E+00         | 0.00E+00 | 0.00E+00               | 0.00E+00 | 0.00E+00 | 0.00E+00               | 0.00E+00 |   |
| 77 | Xe-138   | 5.87E-01           | 5.87E-01 | 2.13E-01         | 5.87E-06 | 5.38E-05               | 7.49E-06 | 5.87E-06 | 5.38E-05               | 7.49E-06 |   |
| 78 | Sub-total  |                    |          |                  | 2.75E-03 | 2.52E-02               | 3.51E-03 | 5.47E-02 | 5.02E-01               | 6.99E-02 |   |
| 79 | <b>Total (rem TEDE)</b>  |                    |          |                  | 1.62E-01 | 9.88E-02               | 1.38E-02 | 3.23E+00 | 1.97E+00               | 2.75E-01 |   |
| 80 |  |                    |          |                  |          |                        |          |          |                        |          |   |
| 81 | <sup>1</sup> Dose Conversion Factor (rem/Curie) from Federal Guidance Report (FGR) 11 per Reg. Guide 1.183 |                    |          |                  |          |                        |          |          |                        |          |   |
| 82 | <sup>2</sup> Dose Conversion Factor (rem-m <sup>3</sup> /Curie-second) from FGR 12 per Reg. Guide 1.183    |                    |          |                  |          |                        |          |          |                        |          |   |
| 83 | 3.47E-04 Breathing rate (m <sup>3</sup> /second) per Regulatory Guide 1.183 (without round-off)            |                    |          |                  |          |                        |          |          |                        |          |   |
| 84 | 5.05E-02 Control Room Geometry Factor per Reg. Guide 1.183, Regulatory Position 4.2.7                      |                    |          |                  |          |                        |          |          |                        |          |   |
| 85 | 3.10E+01 EAB σ <sub>r</sub> (meters) for F stability, (taken from PAVAN runs in Ref. 9)                    |                    |          |                  |          |                        |          |          |                        |          |   |
| 86 | 2.226E+02 LPZ σ <sub>r</sub> (meters) for F stability, (taken from PAVAN runs in Ref. 9)                   |                    |          |                  |          |                        |          |          |                        |          |   |
| 87 | 1.00E+00 Wind Speed (m/s)  |                    |          |                  |          |                        |          |          |                        |          |   |
| 88 | 4.29E-04 X/Q (seconds/m <sup>3</sup> ) at EA Boundary - 0-2 hours based on RG 1.5 methodology              |                    |          |                  |          |                        |          |          |                        |          |   |
| 89 | 5.97E-05 X/Q (seconds/m <sup>3</sup> ) at Low Population Zone - 0-2 based on RG 1.5 methodology            |                    |          |                  |          |                        |          |          |                        |          |   |

|    | A                    | B                 | C                    | D               | E                 | F                 | G                           |
|----|----------------------|-------------------|----------------------|-----------------|-------------------|-------------------|-----------------------------|
| 1  | <b>PBAPS MSLB Dc</b> |                   |                      |                 |                   | Case 1:           | Reactor Coolant at maximum  |
| 2  |                      |                   |                      |                 |                   | Case 2:           | Reactor Coolant at maximum  |
| 3  | 69337                | Volume of cloud   |                      |                 |                   |                   |                             |
| 4  | 75131000             | Mass of water in  |                      |                 |                   |                   |                             |
| 5  | =25800*453.59        | Mass of steam r   |                      |                 |                   |                   |                             |
| 6  | 1                    | reactor coolant c |                      |                 |                   |                   |                             |
| 7  | 64.2                 | seconds for clou  |                      |                 |                   |                   |                             |
| 8  | 176000               | Volume of Contr   |                      |                 |                   |                   |                             |
| 9  |                      |                   |                      |                 |                   |                   |                             |
| 10 | Halogens             |                   |                      |                 |                   |                   |                             |
| 11 |                      | Activity          |                      |                 |                   |                   |                             |
| 12 |                      | Distribution      |                      | Normalized      | Case 1            | Case 2            | Case 1                      |
| 13 | Isotope              | (UFSAR            | FGR 11               | I-131 DE        | Normalized        | Normalized        | Activity                    |
| 14 |                      | Sect. 14.6.5)     | DCF <sup>1</sup>     | Activity        | Activity          | Activity          | Release                     |
| 15 |                      | uCi/cc            | Rem/Ci               | uCi/cc          | uCi/cc            | uCi/cc            | Ci                          |
| 16 | I-131                | 0.17              | 32900                | =C16*B16/C\$16  | =D16*0.2/D\$21    | =E16*20           | =E16*\$A\$4*0.000001/\$A\$6 |
| 17 | I-132                | 1.02              | 381                  | =C17*B17/C\$16  | =D17*0.2/D\$21    | =E17*20           | =E17*\$A\$4*0.000001/\$A\$6 |
| 18 | I-133                | 1.04              | 5846                 | =C18*B18/C\$16  | =D18*0.2/D\$21    | =E18*20           | =E18*\$A\$4*0.000001/\$A\$6 |
| 19 | I-134                | 1.47              | 131                  | =C19*B19/C\$16  | =D19*0.2/D\$21    | =E19*20           | =E19*\$A\$4*0.000001/\$A\$6 |
| 20 | I-135                | 1.3               | 1230                 | =C20*B20/C\$16  | =D20*0.2/D\$21    | =E20*20           | =E20*\$A\$4*0.000001/\$A\$6 |
| 21 |                      |                   |                      | =SUM(D16:D20)   | =SUM(E16:E20)     | =SUM(F16:F20)     |                             |
| 22 |                      |                   |                      |                 | "non-spiked"      | "spiked"          |                             |
| 23 | Noble Gases          |                   |                      |                 |                   |                   |                             |
| 24 |                      | Calc.             |                      |                 | Case 1            | Case 2            |                             |
| 25 |                      | PM-740-A          |                      |                 | Release           | Release           |                             |
| 26 |                      | Table 3           | Case 1               | Case 2          | Cloud             | Cloud             |                             |
| 27 | Isotope              | Noble Gas         | Activity             | Activity        | Concentration     | Concentration     |                             |
| 28 |                      | Activity          | Release              | Release         |                   |                   |                             |
| 29 |                      | uCi/gm            | Ci                   | Ci              | Ci/m <sup>3</sup> | Ci/m <sup>3</sup> |                             |
| 30 |                      |                   |                      |                 |                   |                   |                             |
| 31 | Kr-83M               | 0.00192           | =B31*\$A\$5*0.000001 | 0.02246903424   | =C31/\$A\$3       | =D31/\$A\$3       |                             |
| 32 | Kr-85M               | 0.00344           | =B32*\$A\$5*0.000001 | 0.04025701968   | =C32/\$A\$3       | =D32/\$A\$3       |                             |
| 33 | Kr-85                | 0.0000113         | =B33*\$A\$5*0.000001 | 0.0001322396286 | =C33/\$A\$3       | =D33/\$A\$3       |                             |
| 34 | Kr-87                | 0.0113            | =B34*\$A\$5*0.000001 | 0.1322396286    | =C34/\$A\$3       | =D34/\$A\$3       |                             |
| 35 | Kr-88                | 0.0113            | =B35*\$A\$5*0.000001 | 0.1322396286    | =C35/\$A\$3       | =D35/\$A\$3       |                             |
| 36 | Kr-89                | 0.0733            | =B36*\$A\$5*0.000001 | 0.8578021926    | =C36/\$A\$3       | =D36/\$A\$3       |                             |
| 37 | Xe-131M              | 0.00000846        | =B37*\$A\$5*0.000001 | 0.0000990041821 | =C37/\$A\$3       | =D37/\$A\$3       |                             |
| 38 | Xe-133M              | 0.000163          | =B38*\$A\$5*0.000001 | 0.001907527386  | =C38/\$A\$3       | =D38/\$A\$3       |                             |
| 39 | Xe-133               | 0.00462           | =B39*\$A\$5*0.000001 | 0.05406611364   | =C39/\$A\$3       | =D39/\$A\$3       |                             |
| 40 | Xe-135M              | 0.0147            | =B40*\$A\$5*0.000001 | 0.1720285434    | =C40/\$A\$3       | =D40/\$A\$3       |                             |
| 41 | Xe-135               | 0.0124            | =B41*\$A\$5*0.000001 | 0.1451125128    | =C41/\$A\$3       | =D41/\$A\$3       |                             |
| 42 | Xe-137               | 0.0846            | =B42*\$A\$5*0.000001 | 0.9900418212    | =C42/\$A\$3       | =D42/\$A\$3       |                             |
| 43 | Xe-138               | 0.0502            | =B43*\$A\$5*0.000001 | 0.5874716244    | =C43/\$A\$3       | =D43/\$A\$3       |                             |
| 44 |                      |                   |                      |                 |                   |                   |                             |

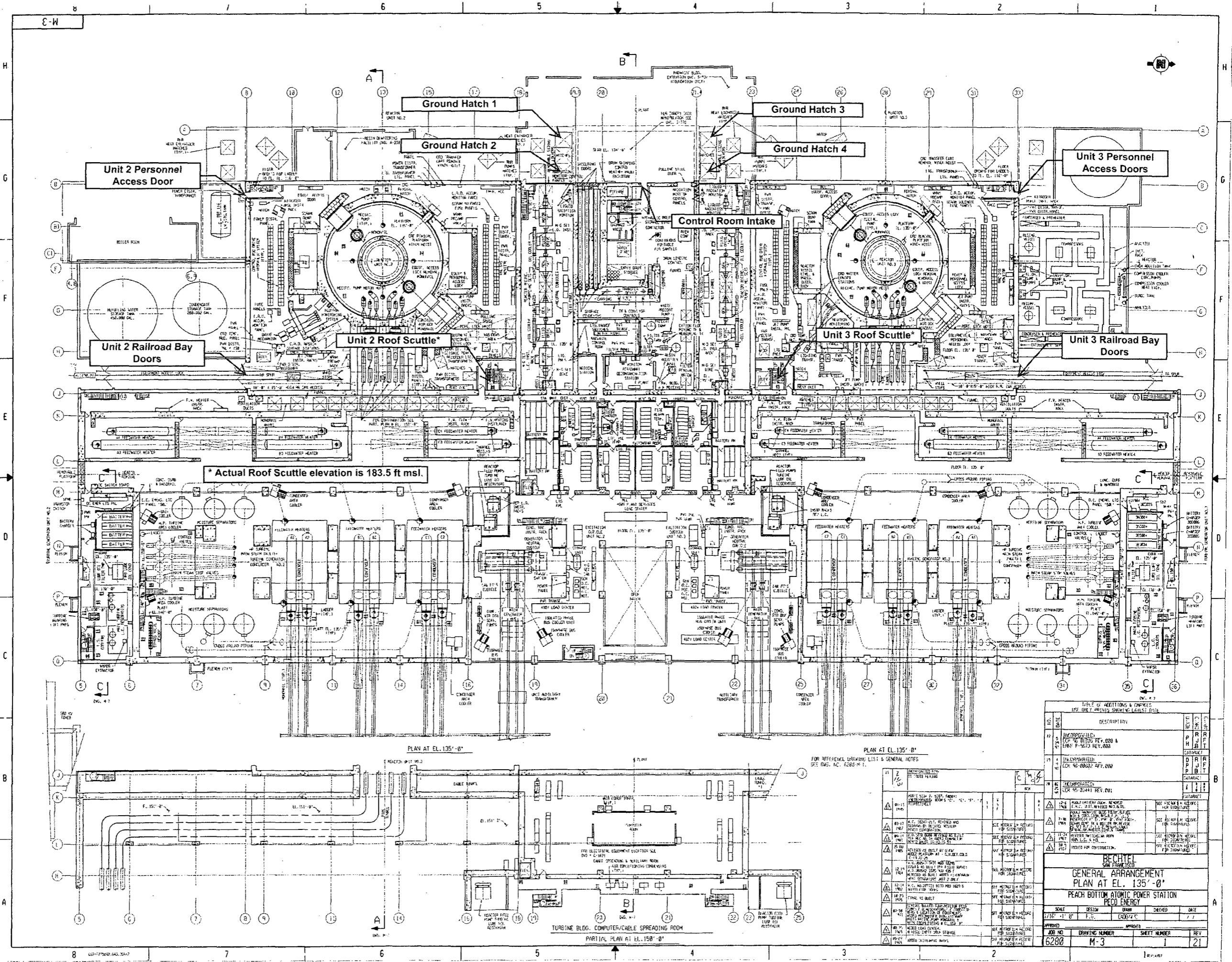
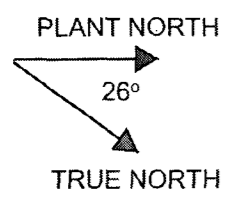
|    | A                   | B                                | C                  | D                | E                | F                         | G                          |
|----|---------------------|----------------------------------|--------------------|------------------|------------------|---------------------------|----------------------------|
| 45 | Inhalation Doses    |                                  |                    |                  |                  |                           |                            |
| 46 |                     |                                  | Curies Released    |                  |                  |                           | Case 1 Dose (rem CEDE)     |
| 47 |                     |                                  | to the Environment |                  |                  |                           | (Inhalation)               |
| 48 | Isotope             |                                  | Case 1             | Case 2           | DCF <sup>1</sup> | CR                        | EAB                        |
| 49 | I-131               |                                  | =G16               | =H16             | 32900            | =I16*\$E49*\$A\$83*\$A\$7 | =C49*\$E49*\$A\$83*\$A\$88 |
| 50 | I-132               |                                  | =G17               | =H17             | 381              | =I17*\$E50*\$A\$83*\$A\$7 | =C50*\$E50*\$A\$83*\$A\$88 |
| 51 | I-133               |                                  | =G18               | =H18             | 5846             | =I18*\$E51*\$A\$83*\$A\$7 | =C51*\$E51*\$A\$83*\$A\$88 |
| 52 | I-134               |                                  | =G19               | =H19             | 131              | =I19*\$E52*\$A\$83*\$A\$7 | =C52*\$E52*\$A\$83*\$A\$88 |
| 53 | I-135               |                                  | =G20               | =H20             | 1230             | =I20*\$E53*\$A\$83*\$A\$7 | =C53*\$E53*\$A\$83*\$A\$88 |
| 54 |                     |                                  |                    |                  | Totals           | =SUM(F49:F53)             | =SUM(G49:G53)              |
| 55 |                     |                                  |                    |                  |                  |                           |                            |
| 56 | External Doses      |                                  |                    |                  |                  |                           |                            |
| 57 |                     |                                  | Curies Released    |                  |                  |                           | Case 1 Dose (rem EDE)      |
| 58 |                     |                                  | to the Environment |                  |                  |                           | (External)                 |
| 59 | Isotope             |                                  | Case 1             | Case 2           | DCF <sup>2</sup> | CR                        | EAB                        |
| 60 | I-131               |                                  | =C49               | =D49             | 0.06734          | =I16*\$E60*\$A\$84*\$A\$7 | =C60*\$E60*\$A\$88         |
| 61 | I-132               |                                  | =C50               | =D50             | 0.4144           | =I17*\$E61*\$A\$84*\$A\$7 | =C61*\$E61*\$A\$88         |
| 62 | I-133               |                                  | =C51               | =D51             | 0.10878          | =I18*\$E62*\$A\$84*\$A\$7 | =C62*\$E62*\$A\$88         |
| 63 | I-134               |                                  | =C52               | =D52             | 0.481            | =I19*\$E63*\$A\$84*\$A\$7 | =C63*\$E63*\$A\$88         |
| 64 | I-135               |                                  | =C53               | =D53             | 0.29526          | =I20*\$E64*\$A\$84*\$A\$7 | =C64*\$E64*\$A\$88         |
| 65 | Kr-83M              |                                  | 0.02246903424      | 0.02246903424    | 0.00000555       | =E31*\$E65*\$A\$84*\$A\$7 | =C65*\$E65*\$A\$88         |
| 66 | Kr-85M              |                                  | 0.04025701968      | 0.04025701968    | 0.027676         | =E32*\$E66*\$A\$84*\$A\$7 | =C66*\$E66*\$A\$88         |
| 67 | Kr-85               |                                  | 0.0001322396286    | 0.0001322396286  | 0.0004403        | =E33*\$E67*\$A\$84*\$A\$7 | =C67*\$E67*\$A\$88         |
| 68 | Kr-87               |                                  | 0.1322396286       | 0.1322396286     | 0.15244          | =E34*\$E68*\$A\$84*\$A\$7 | =C68*\$E68*\$A\$88         |
| 69 | Kr-88               |                                  | 0.1322396286       | 0.1322396286     | 0.3774           | =E35*\$E69*\$A\$84*\$A\$7 | =C69*\$E69*\$A\$88         |
| 70 | Kr-89               |                                  | 0.8578021926       | 0.8578021926     | 0                | =E36*\$E70*\$A\$84*\$A\$7 | =C70*\$E70*\$A\$88         |
| 71 | Xe-131M             |                                  | 0.00009900418212   | 0.00009900418212 | 0.0014393        | =E37*\$E71*\$A\$84*\$A\$7 | =C71*\$E71*\$A\$88         |
| 72 | Xe-133M             |                                  | 0.001907527386     | 0.001907527386   | 0.005069         | =E38*\$E72*\$A\$84*\$A\$7 | =C72*\$E72*\$A\$88         |
| 73 | Xe-133              |                                  | 0.05406611364      | 0.05406611364    | 0.005772         | =E39*\$E73*\$A\$84*\$A\$7 | =C73*\$E73*\$A\$88         |
| 74 | Xe-135M             |                                  | 0.1720285434       | 0.1720285434     | 0.07548          | =E40*\$E74*\$A\$84*\$A\$7 | =C74*\$E74*\$A\$88         |
| 75 | Xe-135              |                                  | 0.1451125128       | 0.1451125128     | 0.04403          | =E41*\$E75*\$A\$84*\$A\$7 | =C75*\$E75*\$A\$88         |
| 76 | Xe-137              |                                  | 0.9900418212       | 0.9900418212     | 0                | =E42*\$E76*\$A\$84*\$A\$7 | =C76*\$E76*\$A\$88         |
| 77 | Xe-138              |                                  | 0.5874716244       | 0.5874716244     | 0.21349          | =E43*\$E77*\$A\$84*\$A\$7 | =C77*\$E77*\$A\$88         |
| 78 | Sub-total           |                                  |                    |                  |                  | =SUM(F60:F77)             | =SUM(G60:G77)              |
| 79 | Total (rem TEDE)    |                                  |                    |                  |                  | =SUM(F54:F78)             | =SUM(G54:G78)              |
| 80 |                     |                                  |                    |                  |                  |                           |                            |
| 81 |                     | <sup>1</sup> Dose Conversion     |                    |                  |                  |                           |                            |
| 82 |                     | <sup>2</sup> Dose Conversion     |                    |                  |                  |                           |                            |
| 83 | 0.000347            | Breathing rate (m <sup>3</sup> ) |                    |                  |                  |                           |                            |
| 84 | =(A\$8^0.338)/1173  | Control Room Ged                 |                    |                  |                  |                           |                            |
| 85 | 31                  | EAB σ <sub>y</sub> (meters) fo   |                    |                  |                  |                           |                            |
| 86 | 222.6               | LPZ σ <sub>y</sub> (meters) fo   |                    |                  |                  |                           |                            |
| 87 | 1                   | Wind Speed (m/s)                 |                    |                  |                  |                           |                            |
| 88 | =0.0133/A\$85/A\$87 | X/Q (seconds/m <sup>3</sup> )    |                    |                  |                  |                           |                            |
| 89 | =0.0133/A\$86/A\$87 | X/Q (seconds/m <sup>3</sup> )    |                    |                  |                  |                           |                            |

|    | H   | I                 | J                 | K |
|----|---|-------------------|-------------------|---|
| 1  | value (DE I-131 of 0.2 uCi/cc) permitted for continued full power operation             |                   |                   |   |
| 2  |   |                   |                   |   |
| 3  | value permitted (DE I-131 of 4.0 uCi/cc) corresponding to an assumed pre-accident spike |                   |                   |   |
| 4  |   |                   |                   |   |
| 5  |   |                   |                   |   |
| 6  |   |                   |                   |   |
| 7  |   |                   |                   |   |
| 8  |   |                   |                   |   |
| 9  |   |                   |                   |   |
| 10 |   | Case 1            | Case 2            |   |
| 11 |   | Release           | Release           |   |
| 12 | Case 2  | Cloud             | Cloud             |   |
| 13 | Activity  | Concentration     | Concentration     |   |
| 14 | Release   |                   |                   |   |
| 15 | Ci  | Ci/m <sup>3</sup> | Ci/m <sup>3</sup> |   |
| 16 | =F16*\$A\$4*0.000001/\$A\$6   | =G16/\$A\$3       | =H16/\$A\$3       |   |
| 17 | =F17*\$A\$4*0.000001/\$A\$6   | =G17/\$A\$3       | =H17/\$A\$3       |   |
| 18 | =F18*\$A\$4*0.000001/\$A\$6   | =G18/\$A\$3       | =H18/\$A\$3       |   |
| 19 | =F19*\$A\$4*0.000001/\$A\$6   | =G19/\$A\$3       | =H19/\$A\$3       |   |
| 20 | =F20*\$A\$4*0.000001/\$A\$6   | =G20/\$A\$3       | =H20/\$A\$3       |   |
| 21 |   |                   |                   |   |
| 22 |   |                   |                   |   |
| 23 |   |                   |                   |   |
| 24 |   |                   |                   |   |
| 25 |   |                   |                   |   |
| 26 |   |                   |                   |   |
| 27 |   |                   |                   |   |
| 28 |   |                   |                   |   |
| 29 |   |                   |                   |   |
| 30 |   |                   |                   |   |
| 31 |   |                   |                   |   |
| 32 |   |                   |                   |   |
| 33 |   |                   |                   |   |
| 34 |   |                   |                   |   |
| 35 |   |                   |                   |   |
| 36 |   |                   |                   |   |
| 37 |   |                   |                   |   |
| 38 |   |                   |                   |   |
| 39 |   |                   |                   |   |
| 40 |   |                   |                   |   |
| 41 |   |                   |                   |   |
| 42 |   |                   |                   |   |
| 43 |   |                   |                   |   |
| 44 |   |                   |                   |   |

|    | H                          | I                         | J                          | K                          |
|----|----------------------------|---------------------------|----------------------------|----------------------------|
| 45 |                            |                           |                            |                            |
| 46 |                            |                           | Case 2 Dose (rem CEDE)     |                            |
| 47 |                            |                           | (Inhalation)               |                            |
| 48 | LPZ                        | CR                        | EAB                        | LPZ                        |
| 49 | =C49*\$E49*\$A\$83*\$A\$89 | =J16*\$E49*\$A\$83*\$A\$7 | =D49*\$E49*\$A\$83*\$A\$88 | =D49*\$E49*\$A\$83*\$A\$89 |
| 50 | =C50*\$E50*\$A\$83*\$A\$89 | =J17*\$E50*\$A\$83*\$A\$7 | =D50*\$E50*\$A\$83*\$A\$88 | =D50*\$E50*\$A\$83*\$A\$89 |
| 51 | =C51*\$E51*\$A\$83*\$A\$89 | =J18*\$E51*\$A\$83*\$A\$7 | =D51*\$E51*\$A\$83*\$A\$88 | =D51*\$E51*\$A\$83*\$A\$89 |
| 52 | =C52*\$E52*\$A\$83*\$A\$89 | =J19*\$E52*\$A\$83*\$A\$7 | =D52*\$E52*\$A\$83*\$A\$88 | =D52*\$E52*\$A\$83*\$A\$89 |
| 53 | =C53*\$E53*\$A\$83*\$A\$89 | =J20*\$E53*\$A\$83*\$A\$7 | =D53*\$E53*\$A\$83*\$A\$88 | =D53*\$E53*\$A\$83*\$A\$89 |
| 54 | =SUM(H49:H53)              | =SUM(I49:I53)             | =SUM(J49:J53)              | =SUM(K49:K53)              |
| 55 |                            |                           |                            |                            |
| 56 |                            |                           |                            |                            |
| 57 |                            |                           | Case 2 Dose (rem EDE)      |                            |
| 58 |                            |                           | (External)                 |                            |
| 59 | LPZ                        | CR                        | EAB                        | LPZ                        |
| 60 | =C60*\$E60*\$A\$89         | =J16*\$E60*\$A\$84*\$A\$7 | =D60*\$E60*\$A\$88         | =D60*\$E60*\$A\$89         |
| 61 | =C61*\$E61*\$A\$89         | =J17*\$E61*\$A\$84*\$A\$7 | =D61*\$E61*\$A\$88         | =D61*\$E61*\$A\$89         |
| 62 | =C62*\$E62*\$A\$89         | =J18*\$E62*\$A\$84*\$A\$7 | =D62*\$E62*\$A\$88         | =D62*\$E62*\$A\$89         |
| 63 | =C63*\$E63*\$A\$89         | =J19*\$E63*\$A\$84*\$A\$7 | =D63*\$E63*\$A\$88         | =D63*\$E63*\$A\$89         |
| 64 | =C64*\$E64*\$A\$89         | =J20*\$E64*\$A\$84*\$A\$7 | =D64*\$E64*\$A\$88         | =D64*\$E64*\$A\$89         |
| 65 | =C65*\$E65*\$A\$89         | =F31*\$E65*\$A\$84*\$A\$7 | =D65*\$E65*\$A\$88         | =D65*\$E65*\$A\$89         |
| 66 | =C66*\$E66*\$A\$89         | =F32*\$E66*\$A\$84*\$A\$7 | =D66*\$E66*\$A\$88         | =D66*\$E66*\$A\$89         |
| 67 | =C67*\$E67*\$A\$89         | =F33*\$E67*\$A\$84*\$A\$7 | =D67*\$E67*\$A\$88         | =D67*\$E67*\$A\$89         |
| 68 | =C68*\$E68*\$A\$89         | =F34*\$E68*\$A\$84*\$A\$7 | =D68*\$E68*\$A\$88         | =D68*\$E68*\$A\$89         |
| 69 | =C69*\$E69*\$A\$89         | =F35*\$E69*\$A\$84*\$A\$7 | =D69*\$E69*\$A\$88         | =D69*\$E69*\$A\$89         |
| 70 | =C70*\$E70*\$A\$89         | =F36*\$E70*\$A\$84*\$A\$7 | =D70*\$E70*\$A\$88         | =D70*\$E70*\$A\$89         |
| 71 | =C71*\$E71*\$A\$89         | =F37*\$E71*\$A\$84*\$A\$7 | =D71*\$E71*\$A\$88         | =D71*\$E71*\$A\$89         |
| 72 | =C72*\$E72*\$A\$89         | =F38*\$E72*\$A\$84*\$A\$7 | =D72*\$E72*\$A\$88         | =D72*\$E72*\$A\$89         |
| 73 | =C73*\$E73*\$A\$89         | =F39*\$E73*\$A\$84*\$A\$7 | =D73*\$E73*\$A\$88         | =D73*\$E73*\$A\$89         |
| 74 | =C74*\$E74*\$A\$89         | =F40*\$E74*\$A\$84*\$A\$7 | =D74*\$E74*\$A\$88         | =D74*\$E74*\$A\$89         |
| 75 | =C75*\$E75*\$A\$89         | =F41*\$E75*\$A\$84*\$A\$7 | =D75*\$E75*\$A\$88         | =D75*\$E75*\$A\$89         |
| 76 | =C76*\$E76*\$A\$89         | =F42*\$E76*\$A\$84*\$A\$7 | =D76*\$E76*\$A\$88         | =D76*\$E76*\$A\$89         |
| 77 | =C77*\$E77*\$A\$89         | =F43*\$E77*\$A\$84*\$A\$7 | =D77*\$E77*\$A\$88         | =D77*\$E77*\$A\$89         |
| 78 | =SUM(H60:H77)              | =SUM(I60:I77)             | =SUM(J60:J77)              | =SUM(K60:K77)              |
| 79 | =SUM(H54:H78)              | =SUM(I54:I78)             | =SUM(J54:J78)              | =SUM(K54:K78)              |
| 80 |                            |                           |                            |                            |
| 81 |                            |                           |                            |                            |
| 82 |                            |                           |                            |                            |
| 83 |                            |                           |                            |                            |
| 84 |                            |                           |                            |                            |
| 85 |                            |                           |                            |                            |
| 86 |                            |                           |                            |                            |
| 87 |                            |                           |                            |                            |
| 88 |                            |                           |                            |                            |
| 89 |                            |                           |                            |                            |







**FIGURE 1**  
PBAPS AST LAR - RAI Response  
Question 18 Supporting Information

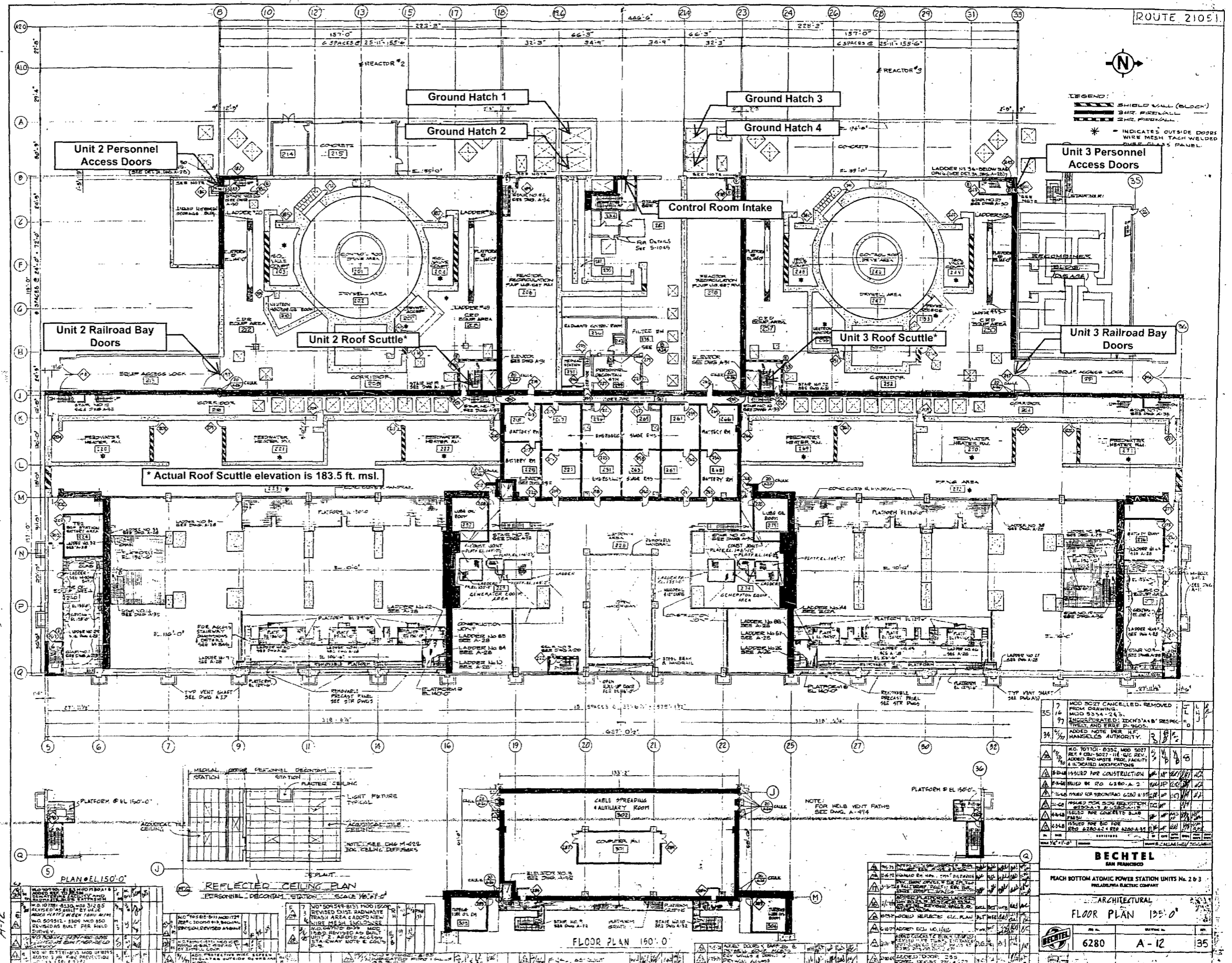
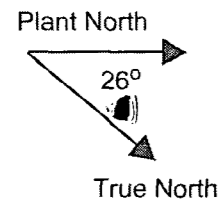
| REVISIONS |      | DESCRIPTION |       |
|-----------|------|-------------|-------|
| NO.       | DATE | BY          | APP'D |
| 1         |      |             |       |
| 2         |      |             |       |
| 3         |      |             |       |
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| 50        |      |             |       |

| TABLE OF REVISIONS & COMMENTS |               |
|-------------------------------|---------------|
| NO.                           | DESCRIPTION   |
| 1                             | ADDED/REVISED |
| 2                             | ADDED/REVISED |
| 3                             | ADDED/REVISED |
| 4                             | ADDED/REVISED |
| 5                             | ADDED/REVISED |
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| 50                            | ADDED/REVISED |

| GENERAL ARRANGEMENT PLAN AT EL. 135'-0" |                           |
|---|---------------------------|
| PEACH BOTTOM ATOMIC POWER STATION       |                           |
| PCED ENERGY                             |                           |
| SCALE                                   | DESIGN DRAWN CHECKED DATE |
| 1/16" = 1'-0"                           | F.S. CWD/2/C              |
| APPROVED                                | APPROVED                  |
| JOB NO. 6288                            | DRAWING NUMBER M-3        |
| SHEET NUMBER 1                          | REV 21                    |



LEGEND:  
 SHIELD WALL (BLOCK)  
 SHIELD WALL  
 SHIELD WALL  
 SHIELD WALL  
 \* INDICATES OUTSIDE DOORS WIRE MESH TAG WELDED TO GLASS PANEL

|    |  |  |  |
|----|--|--|--|
| 7  | MOD 8027 CANCELLED, REMOVED FROM DRAWING.  |  |  |
| 14 | MOD 5334-243.  |  |  |
| 17 | UNDESIGNATED: IDK/M/A/B RESPECIFIED AND ERRE P. 1008.  |  |  |
| 34 | ADDED NOTE PER H.F. HANSEL'S AUTHORITY.  |  |  |
| 35 | NO. 10101-0336 MOD 5027 REF # 020-5027-116. 616 REV. ADDED RIG WASTE PROC. FACILITY & INDICATED MODIFICATIONS. |  |  |
| 36 | ISSUED FOR CONSTRUCTION.   |  |  |
| 37 | REMOVED BY RO 4380-A-3.  |  |  |
| 38 | ISSUED FOR RIG FOR RIGGING.  |  |  |
| 39 | ISSUED FOR RIG FOR RIGGING.  |  |  |
| 40 | ISSUED FOR RIG FOR RIGGING.  |  |  |

**BECHTEL**  
 SAN FRANCISCO

PEACH BOTTOM ATOMIC POWER STATION UNITS No. 2 & 3  
 PEACH BOTTOM ELECTRIC COMPANY

ARCHITECTURAL  
**FLOOR PLAN 195'-0"**

6280 A-12 135

**FIGURE 2**  
 PBAPS AST LAR - RAI Response  
 Question 18 Supporting Information

PLAN @ EL 150'-0"

|                        |                        |
|------------------------|------------------------|
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |

REFLECTED CEILING PLAN  
 PERSONNEL DECONTAMINATION STATION SCALE 1/8" = 1'-0"

|                        |                        |
|------------------------|------------------------|
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |

FLOOR PLAN 150'-0"

|                        |                        |
|------------------------|------------------------|
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |
| NO. 50951-811 MOD 1502 | NO. 50951-811 MOD 1502 |