

10 CFR 71.95

RS-14-229

August 13, 2014

ATTN: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Exelon Generation Company, LLC  
10 CFR 71, "Packaging and Transportation of Radioactive Material"  
NRC Docket No.71-0008

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
10 CFR 71, "Packaging and Transportation of Radioactive Material"  
NRC Docket No. 71-0383

R.E. Ginna Nuclear Power Plant  
10 CFR 71, "Packaging and Transportation of Radioactive Material"  
NRC Docket No. 71-0019

Nine Mile Point Nuclear Station, Units 1 and 2  
10 CFR 71, "Packaging and Transportation of Radioactive Material"  
NRC Docket No. 71-0045

Subject: Report In Accordance With 10 CFR 71.95(a) for As-Built Discrepancies Relative to Certificate of Compliance No. 9233

Reference: Letter from P. Triska (AREVA TN) to M. Lombard (U. S. NRC), "Report Pursuant to 10 CFR 71.95(a)(3) and (b) of As-Built Discrepancies in the TN-RAM Packaging Relative to Certificate of Compliance No. 9233," dated June 18, 2014 [ADAMS Accession No. ML1471A358]

In accordance with 10 CFR 71.95, "Reports," sub-paragraph (a)(3), Exelon Generation Company, LLC (EGC) is submitting this report to communicate potential instances in which the conditions of approval in Certificate of Compliance (CoC) No. 9233 for the AREVA TN Americas (AREVA TN) TN-RAM transport package [USA/9233/B(U)-96] may not have been followed for shipments of radioactive material from EGC nuclear stations.

The TN-RAM condition prompting this report was initially communicated to the NRC by AREVA TN in the referenced letter. This report is based on EGC's discovery of the potential condition on June 19, 2014 when AREVA TN provided the referenced letter to registered users of the TN-RAM.

The potential condition involves 12 discrepancies between the as-built drawings and the original Safety Analysis Report (SAR) drawings for the TN-RAM transport package, which are described in Enclosure 1 to the referenced letter (i.e., "Engineering Evaluation Number 49944-EE-001, Revision 0"). AREVA TN discovered the discrepancies during a due diligence review in conjunction with the fabrication of a second TN-RAM transport package.

As described in the referenced letter, the engineering evaluation of the discrepancies concluded that there were no safety significant issues, there was no reduction in effectiveness of the TN-RAM transport package, and that the components and systems of the TN-RAM were not adversely affected by the discrepancies. AREVA TN provided additional information in Enclosure 2 to the referenced letter, "TN-RAM Annual Maintenance Timeline," that validated these conclusions.

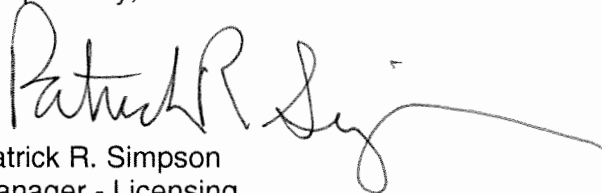
Prior to 2008, EGC used the TN-RAM numerous times (i.e., approximately 80) to transport low level radioactive waste (LLRW) from the EGC nuclear stations to the Barnwell LLRW burial site. Since 2008, Exelon has used the TN-RAM twice in January 2014 to ship LLRW from the Oyster Creek Nuclear Generating Station to the Barnwell facility.

In a letter dated June 11, 2014, AREVA TN Americas submitted an application to the NRC requesting an amendment to CoC No. 9233 to correct the discrepancies [ADAMS Accession No. ML14169A117]. The NRC approved the amendment and issued Revision 12 to CoC No. 9233 in a letter dated July 3, 2014 [ADAMS Accession Nos. ML 14188A896 and ML14188C119].

There are no regulatory commitments in this submittal.

Should you have any questions, please contact Mr. John L. Schrage at (630) 657-2821.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long horizontal flourish extending to the right.

Patrick R. Simpson  
Manager - Licensing  
Exelon Generation Company, LLC