ZIONSOLUTIONS LLC
An EnergySolutions Company

August 18, 2014 ZS-2014-0271

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

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Subject: Zion*Solutions*' 10 CFR 71.95 Report of Non-Compliance with Certificate of Compliance No. 9168, Revision No. 20 – Cask 8-120B

Reference:

1. Pierre Saverot, U.S. Nuclear Regulatory Commission, Letter to Steven E. Sisley, Energy*Solutions*, "Corrected Certificate of Compliance No. 9168, Revision No. 20, for the Model No. 8-120B Package," dated December 18, 2013

In accordance with the requirements of 10 CFR 71.95, Zion*Solutions*, LLC (ZS) hereby submits this report for a condition that resulted in the Certificate of Compliance for the *EnergySolutions* Model No. 8-120B shipping cask (Reference 1) not being followed prior to a shipment.

It was identified that prior to making a radioactive waste shipment, ZS failed to maintain 8-120B cask safety analysis report (SAR) drawings on-site as required by 10 CFR 71.17. ZS obtained current copies of these drawings prior to shipping the radioactive waste to an off-site location.

ZS determined there were no adverse safety consequences due to failing to possess current copies of the 8-120B cask drawings on-site. Please find the 10 CFR 71.95 Report as Enclosure 1 to this letter.

This submittal contains no new regulatory commitments or revisions to existing commitments. If you should have any questions regarding this submittal, please contact me at (224) 789-4025.

Respectfully,

Gerard van Noordennen

Gerard van Noordennen
VP Regulatory Affairs

cc: John Hickman, U.S. NRC Senior Project Manager
Steven Sisley, Energy*Solutions* Cask Licensing Manager
Service List

Enclosure 1: Zion*Solutions* 10 CFR 71.95 Report

FSME20

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Zion*Solutions*

10 CFR 71.95 Report

1. Abstract

During an NRC inspection of a Zion*Solutions*' (ZS) radioactive waste shipment using an Energy*Solutions* 8-120B cask (Certificate of Compliance No. 9168, Rev 20), it was identified that ZS did not possess the necessary 8-120B cask safety analysis report (SAR) drawings on-site as required by 10 CFR 71.17. These SAR drawings are classified as security related. The Waste Operations Group interpreted this security classification to require maintenance of the 8-120B cask drawings at the Energy*Solutions* Cask Group facility and not at the Zion site. Following this identification, the ZS Waste Operations Manager contacted the Energy*Solutions* Cask Group and obtained copies of the current Energy*Solutions* 8-120B cask SAR drawings prior to the radioactive waste shipment. Additionally, the ZS Waste Operations Manager requested the Energy*Solutions* Document Control department include ZS in their document control program to provide updates of the cask drawings. This ensures ZS will receive updates to the 8-120B cask Certificate of Compliance and related cask drawings necessary to meet current and future Certificate of Compliance conditions.

ZS uses the Energy*Solutions* cask model 8-120B for shipments of radioactive waste originating from the Zion Nuclear Power Station.

No safety concerns were identified as a result of this issue.

2. Event Description

ZS planned to ship radioactive waste generated on-site to an off-site waste disposal facility on June 21, 2014 using an Energy*Solutions* 8-120B shipping cask. Prior to this shipment, NRC inspectors came to the site to observe the scheduled shipment and review the waste operations program and associated documentation. On June 19, 2014, as part of their review, the inspectors identified that ZS did not possess copies of the 8-120B cask SAR drawings as required by 10 CFR 71.17. Following this identification, the ZS Waste Operations Manager contacted the Energy*Solutions* Cask Group and obtained current copies of the 8-120B cask SAR drawings. The ZS Waste Operations Manager also requested the Energy*Solutions* Document Control department to include ZS in their document control program to provide updates to the 8-120B cask drawings and other required documentation. All required documentation was on-site prior to the shipment of radioactive waste.

ZS failed to comply with 10 CFR 71.17 requiring a licensee to possess the 8-120B SAR drawings on-site prior to shipment due to a misinterpretation regarding the security status of the drawings. The 8-120B cask manual described the 8-120B cask drawings as security information. ZS personnel interpreted this description as requiring maintenance of the 8-120B cask drawings by the Energy*Solutions* Cask Group at their facility and not at the Zion site. This issue has been resolved. ZS currently maintains the required 8-120B cask SAR drawing at the Zion site meeting the 10 CFR 71.17 requirements. ZS requested Energy*Solutions*, as owner of the 8-120B cask, to include ZS on a mailing list to provide updates to the 8-120B cask Certificate of Compliance and related cask drawings.

No safety concerns were identified as a result of this issue. A condition report was generated to capture this issue and associated corrective actions (CR-2014-000694).

3. Safety Consequences Assessment

Based on a review by the ZS Waste Operations Group, there were no adverse safety consequences due to ZS' failure to maintain a copy of the 8-120B cask SAR drawings onsite. The required cask drawings were obtained prior to the scheduled radioactive waste shipment.

4. Corrective Actions

ZS entered the NRC inspector's findings into the corrective action program (CR-2014-000649). The corrective actions are as follows:

ZS Waste Operations Manager contacted the Energy*Solutions* Cask group and obtained a copy of the Energy*Solutions* 8-120B cask SAR drawings prior to the scheduled radioactive waste shipment. Completed July 3, 2014

ZS Waste Operations Manager has requested the Energy*Solutions* Document Control department to include ZS in their document control program to provide current copies of the 8-120B cask drawings as updated. This ensures ZS will receive 8-120B cask Certificate of Compliance updates and related documentation necessary to meet all requirements for future radioactive wastes shipments. Completed July 3, 2014

5. Previous Events

Based on a review of the corrective action program, there is no evidence of a previous similar event.

6. Zion*Solutions* Contact Information

Mr. Gerard van Noordennen – Vice President of Regulatory Affairs (224) 789 – 4025

Mr. Mike Wiskerchen – Waste Operations Manager (224) 789-4047

7. Radiation Exposure

There was no unexpected radiation exposure to individuals loading and preparing this cask for shipment.