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January 16, 2015

TMI-15-013

USNRC, Region I
2100 Renaissance Blvd, Suite 100
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Subject: Reporting Requirement 10 CFR 20 Appendix G

Reporting Requirement

10 CFR 20 Appendix G, "Requirements for Transfers of Low-Level Radioactive Waste Intended for Disposal at Licensed Land Disposal Facilities and Manifests," contains investigation and reporting requirements for radioactive waste shipments for which acknowledgement is not received within 20 days after transfer.

Section III.E of this regulation directs the shipper to perform and document an investigation to trace the shipment and file a written report with the nearest NRC Regional Office within 2 weeks of completion of the investigation.

The following text is copied form 10 CFR 20 Appendix G:

"E. Any shipment or part of a shipment for which acknowledgement is not received within the times set forth in this section must:

- 1. Be investigated by the shipper if the shipper has not received notification or receipt within 20 days after transfer; and*
- 2. Be traced and reported. The investigation shall include tracing the shipment and filing a report with the nearest Commission Regional Office listed in Appendix D to this part. Each licensee who conducts a trace investigation shall file a written report with the appropriate NRC Regional Office within 2 weeks of completion of the investigation."*

Background Information

A radioactive waste shipment of 4 Gondola cars containing a total of 61 Control Rod Drive Mechanism's (CRDMs) departed from Three Mile Island (TMI) Nuclear Facility on November 21, 2014 via rail in route to the Energy Solutions disposal facility in Tennessee. The Three Mile Island shipping numbers are RS-14-145-I, RS-14-146-I, RS-14-147-I, RS-14-148-I

Required markings were applied to all packages and appropriate shipping paperwork accompanied each shipment. Energy Solutions acted as the Shipping Broker for Three Mile Island completing all shipping manifests. Transport arrangements were made by Three Mile Island. Norfolk Southern transported the rail cars to Tennessee for receipt by Energy Solutions.

When the shipment left Three Mile Island the gondola cars were being tracked using GPS by Norfolk Southern. A daily trace report was provided to Three Mile Island from Norfolk Southern showing the latest location of the gondola cars.

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The trace report on 12/7/14 showed the gondola cars to be at the Junction Delivery point waiting to be receipted by Energy Solutions. On 12/11/14, day 20 from transport, Energy Solutions was contacted by Three Mile Island asking if they have received the CRDMs. Energy Solutions confirmed that the gondola cards were in close proximity at the Junction Delivery point but would not be receipted until early the following week.

On 12/15/2014 the CRDM manifest was signed off by Energy Solutions acknowledging waste receipt. A copy of the signed NRC 540 form was received at Three Mile Island by email from Energy Solutions on 12/17/14.

Three Mile Island completed its investigation on 1/12/2015.

Investigation Results:

The delay in physical receipt of the CRDMs by Energy Solutions was due to logistical issues with other rail cars already in the transload and the gondola cars with the CRDMs not being able to be physically moved until room was made available.

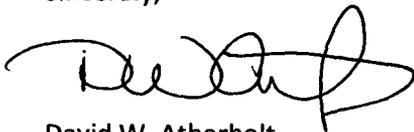
At no time was the location of gondola cars with the CRDMs unknown. The shipment was tracked by the carrier at all times during transit and Energy Solutions personnel verified delivery to the Junction Delivery point. The material condition on receipt at Energy Solutions was acceptable and no discrepancies or violations were identified by Energy Solutions

Corrective Actions:

Site response and actions included placing the issue in the Three Mile Island corrective action program to document the investigation and to identify the cause and corrective actions. Immediate corrective actions included maintaining direct and daily contact with the railroad and during the transit and Energy Solutions while the material was at the Junction Delivery point. Energy Solutions was requested to conduct an internal investigation to identify the cause of the delay and those findings are included in the Background information. Three Mile Island reviewed its radioactive waste shipment training program and procedures, and determined they were adequate.

Please contact George McCarty (717-948-8373) or Mike Fitzwater (717-948-8319) if you have any questions.

Sincerely,



David W. Atherholt
Regulatory Assurance Manager, Three Mile Island Unit 1
Exelon Generation Co., LLC

cc: J. Lamb, U.S. NRC Project Manager
U.S. NRC Document Control Desk