

10 CFR 20 Appendix G

February 4, 2015

ZS-2015-0017

U.S. NRC, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

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: Report of Investigation Pursuant to 10 CFR Part 20 Appendix G

This letter documents the results of an investigation performed with respect to radioactive waste shipments contained in/on three rail cars, which exceeded the 20 day time limit for notification of receipt from the disposal facility as specified in 10 CFR Part 20 Appendix G. The investigation was completed on January 27, 2015 and it was determined that the shipments were being traced on a daily basis and the location of the shipment was known to the carrier, Union Pacific Railroad (UP) and to ZionSolutions, LLC Waste Operations personnel. The disposal facility notification verified that the shipments were received as indicated below.

10 CFR Part 20 Appendix G, "*Requirements for Transfers of Low-Level Radioactive Waste Intended for Disposal at Licensed Land Disposal Facilities and Manifests*," Section III.A(9) states a licensee shall for any shipments or any part of a shipment for which acknowledgment of receipt has not been received within the times set forth in this appendix, conduct an investigation in accordance with paragraph E of this appendix.

Paragraph E states that any shipment or part of 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.

Investigation

On December 18, 2104, one gondola car, ENVX206199 and two ABC container cars, GACX009709 and GIMX516224 were manifested to the EnergySolutions' Clive Disposal facility in Clive, UT, moved to our rail spur and turned over to UP for transport. The Zion shipment numbers for the cars were: ENVX206199- RW-14-139; GACX009709- RW-14-140

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and RW-14-141; GIMX516224- RW-14-142. These cars were not removed by UP from the Zion Station spur until January 7, 2015.

ZionSolutions Waste Operations personnel receives daily tracking reports of all waste shipments transported by rail from UP. The locations of the shipments were verified and tracked until their receipt. The primary cause of the delay was that UP did not begin transporting the cars until twenty-one (21) days after transport was requested. After transport was initiated, transit time was twenty-one (21) additional days.

Receipt notification of the cars/shipment numbers was received as follows:

- ENVX206199- Shipment RW-14-139- notification received on January 20, 2015.
- GACX009709- Shipments RW-14-140 and RW-14-141- notification received on January 26, 2015.
- GIMX516224- Shipment RW-14-142 notification received on January 26, 2015.

Total transit time between when the first cars were released from the Zion site, beginning December 18, 2014, until verification of receipt was received ranged from thirty-four (34) to forty (40) days. Industry experience shows these transit times are not inordinate and/or uncommon during rail transportation. The locations of the shipment were verified and the shipment was traced by ZionSolutions, LLC until their receipt by EnergySolutions to ensure compliance with the requirements of 10 CFR Part 20 Appendix G, Section III.E. At no time were the shipments lost or at an unknown location.

The general issue of rail transit times was initially documented in Condition Report CR-2014-001124; corrective action is being tracked in that Condition Report. Should you have any questions regarding this submittal, please contact me at 224-789-4025.

Respectfully,



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