



NorthStar Nuclear Decommissioning Co., LLC  
Vermont Yankee Nuclear Power Station  
320 Governor Hunt Rd.  
Vernon, VT 05354  
802-451-5354

Corey R. Daniels  
ISFSI Manager

10 CFR 20, Appendix G

BVY 19-037

October 21, 2019

Mr. David C. Lew  
Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

**SUBJECT:** Report of Investigation Pursuant to 10 CFR 20, Appendix G  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
License No. DPR-28

Dear Sir or Madam:

This letter documents the results of an investigation performed with respect to the transportation of contaminated material via one gondola rail car consisting of six (6) soft sided bags and one flat rail car with four (4) freight containers 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 investigations which were completed on October 7, 2019 and October 16, 2019 respectively, determined that the shipments were traced on a daily basis by the various carriers such as the New England Central Railroad, CSX, Union Pacific (UP), and Texas & New Mexico Railway (TXN), the disposal facility - Waste Control Specialist, and the Vermont Yankee waste operations personnel.

10 CFR 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 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 Section III.E of this appendix.

Section III.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.

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Investigation

On August 20, 2019, a gondola rail car consisting of six (6) soft sided bags containing contaminated material departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On September 4, 2019, a flat rail car consisting of four (4) freight containers containing contaminated material departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

The rail cars were released to the first railroad carrier (New England Central Railroad) on August 20, 2019 and September 4, 2019 respectively. After release from the NorthStar Vermont Yankee site, the rail cars were transported for 44 days and 42 days respectively before the shipment arrived at the Waste Control Specialists disposal facility.

NorthStar Vermont Yankee and Waste Control Specialists receives daily tracking reports from the railroad logistics contractor, I.C.E Service Group, for all waste shipments transported by rail from the NorthStar Vermont Yankee site. The location of the subject shipments were verified and traced until receipt at the destination facility. NorthStar Vermont Yankee and Waste Control Specialists tracked the progress of these shipments through the daily trace reports. At no time were the shipments lost or in an unknown location.

Below is the summary for the rail shipments that exceeded the time provided in 10 CFR 20, Appendix G. The summary includes the shipment identification number, Rail Car identification (ID) number, shipment date, date of receipt at the Waste Control Specialists (WCS) disposal facility in Andrews, Texas, and the total number of days the shipment was in transit.

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8982-05	ITFX8003	8/20/2019	10/3/2019	44

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8982-07	ECXX93295	9/4/2019	10/16/2019	42
TSDf-9022-03				

The general issue of rail transit times has been initially documented in Condition Report CR-2019-139; corrective actions, as appropriate, are being tracked in that Condition report.

This letter contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Mr. Thomas B. Silko at (802) 451-5354, Ext 2506.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'CRD/tbs' written in a cursive, stylized font.

CRD/tbs

cc: Mr. Jack D. Parrott, Senior Project Manager  
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U.S. Nuclear Regulatory Commission  
Mail Stop T-5A10  
Washington, DC 20555

Ms. June Tierney, Commissioner  
Vermont Department of Public Service  
112 State Street – Drawer 20  
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