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Jeffery A. Hardy
Regulatory Assurance Manager

PNP 2020-039

November 20, 2020

10 CFR 71.95

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

SUBJECT: 10 CFR 71.95 Report Involving 3-60B Cask

Palisades Nuclear Plant
Docket 50-255
Renewed Facility Operating License No. DPR-20

Entergy Nuclear Operations, Inc., (ENO) hereby submits the enclosed report pursuant to 10 CFR 71.95(a)(3) regarding instances in which the conditions of approval in Certificate of Compliance #71-9321 for the 3-60B cask may not have been observed when making shipments from Palisades Nuclear Plant (PNP). This report is based on a 10 CFR 71.95 report dated October 20, 2020, by the certificate holder, *EnergySolutions*, to the Nuclear Regulatory Commission (NRC). The *EnergySolutions* report to the NRC is provided in Attachment 1.

The attached report is applicable to use of the 3-60B cask by PNP. ENO records show that PNP made a total of two Class B shipments using the 3-60B cask between June 2018 and July 2018. The shipments are listed in Attachment 2.

EnergySolutions failure to perform periodic maintenance inspections has no safety consequence because such inspections were performed prior to each use of 3-60B cask. This letter contains no new commitments and no revisions to existing commitments.

Should you have any questions concerning this report, please contact Mr. Jeffery Hardy, Regulatory Assurance Manager, at (269) 764-2011.

Respectfully,

A handwritten signature in black ink, appearing to be 'JAH' with a stylized flourish at the end.

JAH/mrp

Attachments: 1. EnergySolutions 10 CFR 71.95 Report on the 3-60B cask.
 2. Palisades Nuclear Plant List of Class B shipments using the
 3-60B cask.

CC NRC Region III Regional Administrator, Region III
 NRC Project Manager, Palisades
 NRC Senior Resident Inspector, Palisades

ATTACHMENT 1

PALISADES NUCLEAR PLANT

***Energy Solutions* 10 CFR 71.95 REPORT ON THE 3-60B CASK**

4 Pages Follow



October 20, 2020

ESCD-2020-6

Subject: 10 CFR 71.95 notifications for 3-60B cask (Docket 71-9321) associated with failure to observe certificate of compliance conditions for the 3-60B cask periodic maintenance inspection

Dear Valued Customer:

During a recent NRC audit completed on October 2, 2020 assessing implementation of 10CFR71 program at EnergySolutions Barnwell Logistics Facility (BLF), the NRC inspection team identified that periodic maintenance performed for 3-60B casks (units #1 and #2) did not comply with Chapter 8 of the 3-60B cask Safety Analysis Report (SAR) requirements invoked by the effective revision of the Certificate of Compliance 71-9321(CoC). Specifically, packaging markings (lid alignment markings), fasteners/threaded holes, exposed packaging interior and exterior surfaces were not inspected periodically as required by Table 8-1 of Chapter 8 of the 3-60B cask SAR.

Failure to perform periodic maintenance inspection of these items has no safety consequence because such inspections were performed prior to each use of 3-60B cask. Although, such inspections were performed prior to each use, EnergySolutions failed to inspect these items periodically as required in condition of approval in the CoC 71-9321. As such, condition of approval in the Certificate of Compliance was not observed in making a shipment which is addressed by 10CFR71.95 (a)(3).

Due to the condition above, EnergySolutions suspended the use of the 3-60B casks until appropriate periodic inspections are performed. EnergySolutions generated a Condition Report associated with this issue on September 21, 2020.

EnergySolutions filed the attached report with the NRC containing the information required by 10 CFR 71.95 on October 19, 2020. In the report, EnergySolutions describes the cause of the occurrence and provides information that supports that there is no safety significance associated with this condition. The circumstances described in this report are applicable to EnergySolutions (as a license holder and periodic maintenance inspection provider) and may be applicable to all licensed users (licensees) of 3-60B cask. We expect that the information required for individual users to make their own notifications is contained in this report. Reference to this report in individual user reports would be appropriate, if you so choose.

We sincerely apologize for any inconvenience this issue may have caused within your organization. Our corrective actions as a result of this issue are intended to prevent recurrence of similar issues and to ensure the highest quality of products and services that we provide. Should you have any questions regarding this notice, please contact me at (803)591-9074 or axgelfond@energysolutions.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Aleksandr Gelfond".

Aleksandr Gelfond
Cask Division Engineering/Licensing Manager

Appendix A: ES/NRC 20-004 (3 pages)

cc: Gerard van Noordennen (EnergySolutions)
cc: Rod Turner (EnergySolutions)



October 20, 2020
ES/NRC 20-004

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

Subject: 10CFR 71.95 Report on the 3-60B cask (Docket 71-9321)

EnergySolutions hereby submits the attached report (Attachment 1) providing the information required by 10CFR71.95(a)(3) for instances in which conditions of approval in the Certificate of Compliance for the 3-60B cask have not been observed in making shipments.

The circumstances described in this report is applicable to EnergySolutions (as a license holder and periodic maintenance inspection provider) and may be applicable to all licensed users (licensees) of 3-60B cask.

Should you have any questions regarding this notice, please contact me at (803)591-9074.

This letter is submitted electronically via the NRC Electronic Information Exchange (EIE) system.

Sincerely,

A handwritten signature in black ink, appearing to read "Aleksandr Gelfond".

Aleksandr Gelfond
Cask Division Engineering/Licensing Manager

Attachment 1: Failure to Observe Certificate of Compliance Condition for the 3-60B cask periodic maintenance inspection, October 20, 2020

cc) Pierre Saverot, NRC
Gerard van Noordennen, EnergySolutions



**Failure to Observe Certificate of Compliance Condition
for the 3-60B cask periodic maintenance inspection**

October 20, 2020

1) Abstract

During a recent NRC inspection of EnergySolutions' Barnwell Logistics Facility (BLF), the inspection team identified that periodic maintenance performed for 3-60B casks (units #1 and #2) did not comply with Chapter 8 of the 3-60B cask Safety Analysis Report (SAR) requirements invoked by the latest revision of the Certificate of Compliance 71-9321 (CoC). Specifically, packaging markings (lid alignment markings), fasteners/threaded holes, exposed packaging interior and exterior surfaces were not inspected periodically as required by Table 8-1 of Chapter 8 of the 3-60B cask SAR.

Failure to perform periodic maintenance inspection of these items has no safety consequence because such inspections were performed prior to each use of 3-60B cask. Although, such inspections were performed prior to each use, EnergySolutions failed to inspect these items periodically as required in condition of approval in the CoC 71-9321. As such, condition of approval in the Certificate of Compliance was not observed in making a shipment which is addressed by 10CFR71.95 (a)(3).

2) Narrative Description of the Event

a) Status of Components

3-60B cask units #1 and #2 have been removed from service until required periodic inspections (in accordance with Chapter 8 of the SAR) are completed.

b) Dates of Occurrences

The dates of occurrences for affected packaging's are as follows:

3-60B cask	Dates of Occurrences (shipments)	Number of Shipments
#1	March 2016 to June 2020	27
#2	July- September 2019	3

c) The cause of each component or system failure or personnel error, if known.

EnergySolutions Cask Book Procedure (TR-OP-052) provides a subset of operational, inspection, test and maintenance procedures for 3-60B cask operations. Among these procedures are:

- EnergySolutions Procedure No. CS-FP-PR-016, *3-60B Shipping Cask: Periodic Inspection and Maintenance of Fastener and Threaded Holes*
- EnergySolutions Procedure No. CS-FP-PR-017, *3-60B Shipping Cask: Periodic Maintenance of Exposed Surfaces.*

These procedures were inadvertently omitted from the use by the cask maintenance personnel during periodic maintenance inspections.

Attachment 1 to ES/NRC 20-004



- d) Failure Mode, Mechanism, and Effect of each failed component, if known

Not applicable; no 3-60B packaging components failed.

- e) Systems or Secondary Functions Affected

Not applicable.

- f) Method of Discovery of the Error

The error/condition was identified by the NRC inspection team during an audit of EnergySolutions's Barnwell Logistics Facility (Barnwell, SC).

- 3) Assessment of Safety Consequences

Failure to perform periodic inspection of packaging markings (lid alignment markings), fasteners/threaded holes, exposed packaging interior and exterior surfaces has no safety consequence because such inspections were performed prior to each use of 3-60B cask.

- 4) Planned Corrective Actions

The following corrective actions are planned by EnergySolutions:

- EnergySolutions has removed 3-60B cask units #1 and #2 from service until appropriate annual inspections are performed.
- EnergySolutions has evaluated the condition for reportability under 10CFR 71.95 and has concluded that it is reportable.
- EnergySolutions (as the 3-60B cask license holder and periodic maintenance provider) will submit this report to NRC.
- EnergySolutions will contact licensees (cask users) that have made shipments using the affected 3-60B cask units with request to evaluate reportability under 10CFR71.95 process.
- EnergySolutions will perform an apparent cause analysis and identify additional corrective actions to prevent reoccurrence.
- All required inspections will be performed on the affected casks prior to placing them back into service.

- 5) Previous Similar Events Involving the 3-60B casks

No previous similar events have been identified.

- 6) Contact for Additional Information

Aleksandr Gelfond
EnergySolutions
Cask Division Engineering/Licensing Manager
(803)591-9074
axgelfond@energysolutions.com

- 7) Extent of Exposure of Individuals to Radiation or Radioactive Materials

None

ATTACHMENT 2

**PALISADES NUCLEAR PLANT
LIST OF CLASS B SHIPMENTS USING THE 3-60B CASK**

Shipment #	Cask Used	Destination	Date Shipped	Time
PLP-2018-RW-004	# 3-60B-1	Waste Control Specialists, Compact Waste Disposal Facility Andrews, TX	06/20/2018	09:30 departed Covert, MI
PLP-2018-RW-005	# 3-60B-1	Waste Control Specialists, Compact Waste Disposal Facility Andrews, TX	07/13/2018	16:30 departed Covert, MI