



10 CFR 20, Appendix G

January 13, 2022

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

Indian Point Energy Center
Provisional License No. DPR-5
Renewed Facility License No. DPR-26 and DPR-64
NRC Docket Nos. 50-003, 50-247, 50-286, and 72-051

Subject: Investigation Report of LLRW Shipment Pursuant to 10 CFR 20, Appendix G

Pursuant to the provisions 10 Code of Federal Regulations (CFR) 20, Appendix G, Holtec Decommissioning International, LLC (HDI) is submitting this report to identify the results of the investigations performed relative to shipment and transport of low-level radioactive waste (LLRW) from Indian Point Energy Center (IPEC) to the Waste Control Specialists, LLC (WCS) disposal facility in Andrews, Texas. The LLRW shipment exceeded the 20-day time limit for notification of receipt from the disposal facility as specified in 10 CFR Part 20, Appendix G.

Radwaste Shipment(s) No., 21-1007, 21-1009, 21-3011 and 21-3012 were shipped via flatbed truck from IPEC to Newton, Connecticut and transferred to rail and conveyance to the WCS waste disposal facility in Andrews, Texas. IPEC Radwaste shipping personnel were notified of railcar shipment receipt at WCS after the 20-day time for notification had expired. The total transport time for these LLRW shipments was 21 days.

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, to 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."*



IPEC Radwaste Shippers initiated a trace investigation for these shipments. These trace investigations identified that there were no significant or unusual transport delays encountered.

IPEC Incident Report, IR-IP3-00384 was issued to document the issue of not meeting the 20-day investigation and report time limit identified in 10 CFR 20, Appendix G.

This letter contains no new regulatory commitments.

If you have any questions or need further information, please contact Mr. Walter Wittich, IPEC Licensing or myself at (856) 797-0900, ext. 3578.

Sincerely,

Jean A. Fleming
HDI Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

Attachment – IPEC Radwaste Shipment Investigation Report for LLRW Shipments 21-1007, 21-1009, 21-3011 and 21-3012

cc: (with Attachment)
NRC NMSS Project Manager, Indian Point Energy Center
NRC Senior Regional Inspector, Indian Point Energy Center
President and CEO, NYSERDA
NYS Public Service Commission
NYS Department of Environmental Conservation



HDI-IPEC-22-003

Attachment 1

**IPEC Radwaste Shipment
Investigation Report for LLRW Shipments
21-1007, 21-1009, 21-3011 and 21-3012
LLRW Shipment Exceeded 20-Days**

(2 total pages including cover page)

Indian Point Energy Center Radwaste Shipment Investigation Report

Report #: 21-1007, 21-1009, 21-3011 and 21-3012

Revision#: 0

Investigation Report Completion Date: 1/3/2022

Conclusion: No unusual or significant shipping delays were identified for the referenced shipment. The 20-day time limit identified in 10 CFR 20, Appendix G, for initiating an investigation when shipment receipt notification is not provided from the waste disposal facility is too conservative for road to rail shipments originating from the Indian Point Energy Center (IPEC) and transported to Waste Control Specialists (WCS) facility in Andrews, Texas. An Incident Report (IP3-00384) was written to document the issue of not meeting the 20-day investigation and report time limit

Shipping Report Details:

Shipment Start Date: 12/08/2021

Investigation Start Date: 12/28/2021

Shipment Manifest Numbers: 21-1007, 21-1009, 21-3011, 21-3012

Shipment Item Description: Three highway shipments with a total of four containers total on rail flatcar SOXX20234

Destination: WCS, Andrews, TX

Shipping Companies Involved:

Highway Transporter: S&J Transportation Company

Rail Transporter #1: Housatonic Railroad, Inc

Rail Transporter #2: CSX Transportation, Inc

Rail Transporter #3: Union Pacific

Rail Transporter #4: Watco Companies LLC DBA Texas and New Mexico Railway

On 12/26-28/2021(days 18- 20), flatcar SOXX20234 was in Monahans, Texas, on 12/29/2021, it was in Eunice, NM, and later on 12/29/2021, it was in placed at the WCS site in Andrews, TX

Shipment Current Status: Received at WCS on 12/29 /2021 (21 days)

Investigation Preparer: Ron Passalugo, IPEC WCS Project Manager Shipper for CDI

Investigation Reviewer: Jennifer Bakker, CDI Waste Manager at IPEC