

10 CFR 20, Appendix G

January 25, 2021

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

Oyster Creek Nuclear Generating Station
Renewed Facility License No. DPR-16
NRC Docket Nos. 50-219 and 72-15

Subject: Late LLRW Shipments Investigation Report 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 a report to identify the results of the investigation performed relative to shipment and transport of low-level radioactive waste (LLRW) from Oyster Creek Nuclear Generating Station (OCNGS) to the Waste Control Specialists, LLC (WCS) disposal facility in Andrews, Texas. The LLRW shipments exceeded the 20-day time limit for notification of receipt from the disposal facility as specified in 10 CFR Part 20, Appendix G.

Since December 8, 2020, OCNGS has been shipping various types of LLRW from the facility as a part of facility decommissioning. These various shipments departed the OCNGS via truck, transferred to rail car at the transload facility in Bridgeport, New Jersey, shipped via rail to the Bulk Transfer, LLC facility in Seagrave, Texas, and ultimately, transferred by truck to the WCS facility at Andrews, Texas. Since December 2020, the total transport times for the LLRW shipments have ranged from 30 days to 134 days. Previous late shipment notifications have been submitted to the Nuclear Regulatory Commission in letters dated 30 August, 2021 (ADAMS Ascension No. ML21242A265), 1 December, 2021 (ADAMS Ascension No. ML21335A255), and 16 December, 2021 (ADAMS Ascension No. ML21350A193).

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 shipments 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.”

OCNGS Radwaste Shippers finalized the trace investigation on January 11, 2022. The investigation revealed that the LLRW shipments took between 37 and 91 days to complete transport from OCNGS to the WCS waste disposal facility in Andrews, Texas. These investigations identified that delays were due to mixed mode transportation and that there were no significant or unusual transport delays encountered.

This letter contains no new regulatory commitments.

If you have any questions or need further information, please contact me at (856) 797-0900, ext. 3578.

Sincerely,

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

Attachment – Oyster Creek Nuclear Generating Station Investigation Report, LLRW Shipments Exceeded 20 Days

cc: (with Attachment)
NRC NMSS Project Manager (Oyster Creek Nuclear Generating Station)



HDI-OC-22-004

Attachment

Oyster Creek Nuclear Generating Station Investigation Report

LLRW Shipments Completion Exceeded 20 Days

Oyster Creek Nuclear Generating Station LLRW Shipment Exceeded 20 days

- 1) WCS Shipping Request (SR-2708-0036 and SR-2708-0037):
 - a. On September 16th thru October 1st, 2021, ten (10) trucks consisting of a total of ten (10) Intermodals of concrete and metal debris for disposal departed from the Oyster Creek Nuclear Generating Station (OCNGS) site at 741 U.S. Route 9 South, Forked River, New Jersey to the Waste Control Specialists, LLC waste disposal facility in Andrews, Texas via the SMS Rail Lines transload facility in Bridgeport, New Jersey and the Greenfield Logistics Transload facility in Seagraves, Texas.
 - b. The trucks were released to the transload facility, SMS Rail Lines, on the dates identified above. After release from the OCNGS site, the trucks containing the ten (10) Intermodals of concrete and metal debris were transferred to a multiple unit railcar in Bridgeport, NJ then received at the Greenfield Logistics Transload facility in Seagrave, Texas and transferred back to trucks for delivery/receipt at the WCS waste disposal facility. The overall transit time from initial shipment to receipt at disposal facility was 91 days.
 - c. OCNGS and WCS receive daily tracking reports from the logistics contractor, Greenfield Logistics, LLC, for all waste shipments transported from the OCNGS site. The location of the subject shipment was verified and traced until receipt at the destination facility. OCNGS and WCS tracked the progress of the shipment through the daily trace reports. At no time was the shipment lost or in an unknown location.
 - d. Below is the summary for the shipment 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 disposal facility and the total number of days the shipment was in transit.

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at Waste Control Specialists, LLC.	Total Days In Transit
SR-2708-0036 and SR-2708-0037	ITFX4837/DTTX728240	9/16/2021	12/16/2021	91

- 2) WCS Shipping Request (SR-2708-0039):
 - a. On October 12th thru October 15th, 2021, ten (10) trucks consisting of a total of ten (10) Intermodals of concrete and metal debris for disposal

departed from the Oyster Creek Nuclear Generating Station (OCNGS) site at 741 U.S. Route 9 South, Forked River, New Jersey to the Waste Control Specialists, LLC waste disposal facility in Andrews, Texas via the SMS Rail Lines transload facility in Bridgeport, New Jersey and the Greenfield Logistics Transload facility in Seagraves, Texas.

- b. The trucks were released to the transload facility, SMS Rail Lines, on the dates identified above. After release from the OCNGS site, the trucks containing the ten (10) Intermodals of concrete and metal debris were transferred to a multiple unit railcar in Bridgeport, NJ then received at the Greenfield Logistics Transload facility in Seagrave, Texas and transferred back to trucks for delivery/receipt at the WCS waste disposal facility. The overall transit time from initial shipment to receipt at disposal facility was 64 days.
- c. OCNGS and WCS receive daily tracking reports from the logistics contractor, Greenfield Logistics, LLC, for all waste shipments transported from the OCNGS site. The location of the subject shipment was verified and traced until receipt at the destination facility. OCNGS and WCS tracked the progress of the shipment through the daily trace reports. At no time was the shipment lost or in an unknown location.
- d. Below is the summary for the shipment 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 disposal facility and the total number of days the shipment was in transit.

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at Waste Control Specialists, LLC.	Total Days In Transit
SR-2708-0039	ITFX4739	10/12/2021	12/15/2021	64

3) WCS Shipping Request (SR-2708-0040):

- a. On October 20th thru October 22nd, 2021, nine (9) trucks consisting of a total of ten (10) CVans of metal debris and metal tanks for disposal departed from the Oyster Creek Nuclear Generating Station (OCNGS) site at 741 U.S. Route 9 South, Forked River, New Jersey to the Waste Control Specialists, LLC waste disposal facility in Andrews, Texas via the SMS Rail Lines transload facility in Bridgeport, New Jersey and the Greenfield Logistics Transload facility in Seagraves, Texas.
- b. The trucks were released to the transload facility, SMS Rail Lines, on the dates identified above. After release from the OCNGS site, the trucks containing the ten (10) CVans of metal debris and metal tanks were

transferred to a multiple unit railcar in Bridgeport, NJ then received at the Greenfield Logistics Transload facility in Seagrave, Texas and transferred back to trucks for delivery/receipt at the WCS waste disposal facility. The overall transit time from initial shipment to receipt at disposal facility was 57 days.

- c. OCNGS and WCS receive daily tracking reports from the logistics contractor, Greenfield Logistics, LLC, for all waste shipments transported from the OCNGS site. The location of the subject shipment was verified and traced until receipt at the destination facility. OCNGS and WCS tracked the progress of the shipment through the daily trace reports. At no time was the shipment lost or in an unknown location.
- d. Below is the summary for the shipment 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 disposal facility and the total number of days the shipment was in transit.

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at Waste Control Specialists, LLC.	Total Days In Transit
SR-2708-0040	BNSF238289	10/20/2021	12/17/2021	57

- 4) WCS Shipping Request (SR-2708-0038, SR-2708-0039 and SR-2708-0040):
 - a. On October 5th thru October 19th, 2021, ten (10) trucks consisting of a total of ten (10) Intermodals (IM) of concrete and metal debris for disposal departed from the Oyster Creek Nuclear Generating Station (OCNGS) site at 741 U.S. Route 9 South, Forked River, New Jersey to the Waste Control Specialists, LLC waste disposal facility in Andrews, Texas via the SMS Rail Lines transload facility in Bridgeport, New Jersey and the Greenfield Logistics Transload facility in Seagraves, Texas.
 - b. The trucks were released to the transload facility, SMS Rail Lines, on the dates identified above. After release from the OCNGS site, the trucks containing the ten (10) Intermodals (IM) of concrete and metal debris were transferred to a multiple unit railcar in Bridgeport, NJ then received at the Greenfield Logistics Transload facility in Seagrave, Texas and transferred back to trucks for delivery/receipt at the WCS waste disposal facility. The overall transit time from initial shipment to receipt at disposal facility was 85 days.
 - c. OCNGS and WCS receive daily tracking reports from the logistics contractor, Greenfield Logistics, LLC, for all waste shipments transported from the OCNGS site. The location of the subject shipment was verified

and traced until receipt at the destination facility. OCNGS and WCS tracked the progress of the shipment through the daily trace reports. At no time was the shipment lost or in an unknown location.

- d. Below is the summary for the shipment 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 disposal facility and the total number of days the shipment was in transit.

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at Waste Control Specialists, LLC.	Total Days In Transit
SR-2708-0038, SR-2708-0039 and SR-2708-0040	ITFX15226	10/5/2021	12/29/2021	85

5) WCS Shipping Request (SR-2708-0045):

- a. On December 1st thru December 2nd, 2021, five (5) trucks consisting of a total of seven (7) Intermodals (IM) and three (3) CVans of metal debris for disposal departed from the Oyster Creek Nuclear Generating Station (OCNGS) site at 741 U.S. Route 9 South, Forked River, New Jersey to the Waste Control Specialists, LLC waste disposal facility in Andrews, Texas via the SMS Rail Lines transload facility in Bridgeport, New Jersey and the Greenfield Logistics Transload facility in Seagraves, Texas.
- b. The trucks were released to the transload facility, SMS Rail Lines, on the dates identified above. After release from the OCNGS site, the trucks containing the seven (7) Intermodals (IM) and three (3) CVans of metal debris were transferred to a multiple unit railcar in Bridgeport, NJ then received at the Greenfield Logistics Transload facility in Seagrave, Texas and transferred back to trucks for delivery/receipt at the WCS waste disposal facility. The overall transit time from initial shipment to receipt at disposal facility was 37 days.
- c. OCNGS and WCS receive daily tracking reports from the logistics contractor, Greenfield Logistics, LLC, for all waste shipments transported from the OCNGS site. The location of the subject shipment was verified and traced until receipt at the destination facility. OCNGS and WCS tracked the progress of the shipment through the daily trace reports. At no time was the shipment lost or in an unknown location.
- d. Below is the summary for the shipment 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 disposal facility and the total number of days the shipment was in transit.

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at Waste Control Specialists, LLC.	Total Days In Transit
SR-2708-0045	ITFX4831	12/1/2021	1/7/2022	37