

From: [Cruz Perez, Zahira](#)
To: [Jean Fleming](#)
Cc: [Matthew Johnson](#); [Walter Wittich](#)
Subject: Request for Additional Information - Request for Exemption from 10 CFR 20, Appendix G, Section III.E
Date: Thursday, January 27, 2022 3:28:00 PM

Ms. Fleming,

By letter dated November 19, 2021 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML21323A070), Holtec Decommissioning International, LLC (HDI) requested an exemption from certain requirements 10 CFR Part 20, "Standards for Protection Against Radiation," Appendix G, "Requirements for Transfers of Low-Level Radioactive Waste Intended for Disposal at Licensed Land Disposal Facilities and Manifests," Section III.E for shipments of low-level radioactive waste from Indian Point Energy Center (IPEC). The NRC staff has determined that the following additional information is required to complete its review.

In your submittal you stated that: "HDI's experience at IPEC thus far in 2021 and historical data obtained from other decommissioning power reactor sites; Pilgrim Nuclear Power Station (PNPS) and Oyster Creek Nuclear Generating Station (OCNGS) indicate that numerous rail shipments can take longer than 20 days, resulting in an excessive administrative burden because of required investigations and reporting."

Provide site-specific examples of delays in shipments of low-level radioactive waste at IPEC. Also, please provide examples of actions HDI has taken during preparation of shipments to predict and mitigate undesirable conditions which could contribute to delays in shipments beyond the 20-day requirement.

We discussed this request for additional information on January 27th.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this email will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of ADAMS. ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact me.

Thanks,

Zahira

Zahira Cruz

(Pronouns: [She/Her/Hers](#))

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