



10 CFR 20, Appendix G

January 24, 2023

Mr. Raymond Lorson
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road, Suite 102
King of Prussia, PA 19406-1415

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

References:

- (1) Letter Dated December 20th, 2022 from the US Nuclear Regulatory Commission (USNRC) to Holtec International, LLC, "OYSTER CREEK NUCLEAR GENERATING STATION – EXEMPTION FROM TITLE 10 OF THE CODE OF FEDERAL REGULATIONS PART 20, APPENDIX G, SECTION III.E (EPID NO. L-2022-LLE-0025)"

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

In accordance with 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 OCNGS 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.

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), 16 December, 2021 (ADAMS Ascension No. ML21350A193), 25 January, 2022 (ADAMS Ascension No. ML22025A218), 18 February, 2022 (ADAMS Ascension No. ML22049B245), 10 March, 2022 (ADAMS Ascension No. ML22069A376), 10 May, 2022 (ADAMS Ascension No. ML22130A688), and 13 September, 2022 (Via the Region 1 Mail Center Inbox).

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 has been issued an exemption from 10CFR20, Appendix G, Section III.E (Reference 1) that extends the 20-day time limit for receipt notification from the disposal facility to 90 days. As the first two investigated incidents took place prior to the issuance of the exemption (SR-2708-0094 and SR-2708-0101), they are being reported due to the exceedance of 20 days.

OCNGS Radwaste Shippers finalized the trace investigation on January 11, 2023. The investigation revealed that the three LLRW shipments took 52, 43, and 106 days, respectively, to complete transport from OCNGS to the WCS waste disposal facility in Andrews, Texas. The investigation 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 Steven Johnston at (609) 971-4325.

Sincerely,

Jean A. Fleming
Vice President, Licensing, Regulatory Affairs, & PSA
Corporate Engineering Division
Holtec International

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

cc: (with Attachment)
NRC Region 1 Lead Inspector
NRC NMSS Project Manager (Oyster Creek Nuclear Generating Station)



HDI-OC-23-005

Attachment 1

Oyster Creek Nuclear Generating Station Investigation Report

LLRW Shipment Completion Exceeded 20 Days

Oyster Creek Nuclear Generating Station LLRW Shipment Exceeded 20 days

- 1) WCS Shipping Request (SR-2708-0094):
 - a. On August 2nd thru August 3rd, 2022, five (5) trucks consisting of a total of eight (8) Intermodals and two (2) CVans of metal and plastic 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 eight (8) Intermodals and two (2) CVans of metal and plastic 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 52 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-2708-0094	BNSF237629	8/2/22	9/23/22	52

- 2) WCS Shipping Request (SR-2708-0101):
 - a. On August 17th thru August 18th, 2022, six (6) trucks consisting of a total of ten (10) Intermodals of metal/plastic debris and Asphalt/soil 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 metal/plastic debris and Asphalt/soil 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 43 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-2708-0101	ITFX4802	8/17/22	9/29/22	43

3) WCS Shipping Request (SR-2708-0104):

- a. On September 7th thru September 8th, 2022, seven (7) trucks consisting of a total of ten (10) Intermodals of metal/plastic debris and Asphalt/soil 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 metal/plastic debris and Asphalt/soil 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 106 days.

- c. OCNCS and WCS receive daily tracking reports from the logistics contractor, Greenfield Logistics, LLC, for all waste shipments transported from the OCNCS site. The location of the subject shipment was verified and traced until receipt at the destination facility. OCNCS 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-2708-0104	ITFX4866	9/7/22	12/22/22	106