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REGION 1
CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

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Docket No. 50-213

NOV 8 2004 CY-04-222

U. S. Nuclear Regulatory Commission
Region 1
475 Allendale Rd.
King of Prussia, PA 19406

Haddam Neck Plant
10 CFR 20 Twenty Day Time Limit Investigation

This letter documents the investigation performed regarding six (6) shipments of radioactive waste which were not received at the disposal facility within the time provided in 10 CFR 20 Appendix G. The investigation determined the shipments were being tracked on a daily basis and the location of the shipments were known to the carrier during the period the shipments exceeded the time frame set forth in 10 CFR 20 Appendix G. The shipments that are the subject of this investigation have since been received at the disposal site for which they were manifested.

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 (9) states a licensee shall for any shipments or any part of a shipment for which acknowledgement of receipt has not been received within the times set forth in this appendix, conduct an investigation in accordance with paragraph E of this appendix.

Paragraph E states any shipment or part of a 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 of 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.

Connecticut Yankee Atomic Power Company (CYAPCO) shipped six (6) shipments of low-level radioactively contaminated demolition debris to the Envirocare of Utah disposal facility on September 23, 2004. The demolition debris was packaged in six (6) intermodal containers and was transported by truck and rail to the Envirocare of Utah facility for disposal.

NMSS/RGNI MATERIALS-002

In accordance with site procedures, CYAPCO tracked the progress of the shipments to ensure compliance with the requirements of 10 CFR 20 Appendix G. When notifications of receipt for the shipments were not received within the 20 day limit, the carrier, MHF Logistical Solutions, was contacted to verify the shipments were being tracked and their location was known during the time period the shipments exceeded the twenty day time frame. On October 27, 2004 CYAPCO contacted with the carrier, MHF Logistical Solutions, and confirmed that the shipments had been delivered to the consignee, Envirocare of Utah, on October 20, 2004. CYAPCO also contacted the consignee, Envirocare of Utah, and confirmed that the shipments had been received at their facility on October 20, 2004. USNRC Region 1 was notified of the issue on October 14, 2004 by CYAPCO.

On October 14, 2004¹, the NRC granted CYAPCO an exemption from certain requirements of 10 CFR 20, Appendix G, Section III.E, for tracking shipments of low-level radioactive waste that are not acknowledged by the recipient within 20 days after transfer to the shipper. The exemption extends the receipt acknowledgement 20-day time period to 35 days before CYAPCO will have to investigate and report on the status of a low-level radioactive waste shipment. In the future, CYAPCO will be required to investigate if CYAPCO has not received notification of receipt within 35 days after transfer.

Attached is a summary of the shipments which exceeded the time provided in 10 CFR 20 Appendix G. The summary includes the shipment identification numbers, shipment dates, scheduled twenty day receipt dates, and the dates of receipt at Envirocare of Utah.

As stated earlier, the shipments that are the subject of this investigation has been received at the disposal site for which they were manifested.

Should you have any questions regarding this submittal, please contact me at (860) 267-3938.

Sincerely,

 11-8-04
Gerard P. van Noordennen Date
Regulatory Affairs Manager

cc: R. R. Bellamy, Chief, Decommissioning and Laboratory Branch, NRC Region I
USNRC Document Control Desk

¹ T. B. Smith (NRC) to W. Norton (CYAPCO), "Haddam Neck Plant – Exemption from Certain Low-level Waste Shipment Tracking Requirements of 10 CFR Part 20, Appendix G, Section III.E" dated October 14, 2004

USNRC Region 1
CY-04-222 / Attachment

| CY Shipment Number | Date Shipped | Twenty Day Date | Receipt Date |
|-----------------------|--------------|--------------------|--------------|
| 2004-520 | 09/23/2004 | 10/13/2004 | 10/20/2004 |
| 2004-521 | 09/23/2004 | 10/13/2004 | 10/20/2004 |
| 2004-523 | 09/23/2004 | 10/13/2004 | 10/20/2004 |
| 2004-524 | 09/23/2004 | 10/13/2004 | 10/20/2004 |
| 2004-525 | 09/23/2004 | 10/13/2004 | 10/20/2004 |
| 2004-527 | 09/23/2004 | 10/13/2004 | 10/20/2004 |