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NorthStar Nuclear Decommissioning Co., LLC
Vermont Yankee Nuclear Power Station
320 Governor Hunt Rd.
Vernon, VT 05354
802-451-5354

Corey R. Daniels
ISFSI Manager

10 CFR 20, Appendix G

BVY 19-021

June 27, 2019

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

SUBJECT: Report of Investigation Pursuant to 10 CFR 20, Appendix G
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

Dear Sir or Madam:

This letter documents the results of an investigation performed with respect to radioactive waste shipments contained in two rail cars, which exceeded the 20 day time limit for notification of receipt from the disposal facility as specified in 10 CFR Part 20, Appendix G. The investigation was completed on June 24, 2019 and determined that the shipments were traced on a daily basis by the carriers (New England Central Railroad, CSX, Union Pacific (UP), and Texas & New Mexico Railway (TXN) as appropriate); the disposal facility - Waste Control Specialist, and the Vermont Yankee waste operations personnel.

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, 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.

Investigation

Two tank cars containing water shipped by rail from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to a transload facility located in Midlothian, Texas. The water from each tank car was transferred into five (5) and four (4) over-the-road tank trailers (respectively) at the Midlothian site for transport to the Waste Control Specialists disposal facility in Andrews, Texas. The tank cars contained ground water collected at the NorthStar Vermont Yankee site. The water is exempt radioactive material and is not subject to USDOT regulations as hazardous material.

The first tank car was released to the first railroad carrier (New England Central Railroad) on April 22, 2019. After release from the NorthStar Vermont Yankee site, the tank car was transported for 30 days before the shipment arrived at the Midlothian transload site. It took another 16 days to complete the repackaging and shipment of the water to the Waste Control Specialists disposal facility.

The second tank car was released to the first railroad carrier (New England Central Railroad) on May 2, 2019. After release from the NorthStar Vermont Yankee site, the tank car was transported for 20 days before the shipment arrived at the Midlothian transload site. It took another 28 days to complete the repackaging and shipment of the water to the Waste Control Specialists disposal facility.

NorthStar Vermont Yankee and Waste Control Specialists received daily tracking reports from the railroad logistics contractor, I.C.E Service Group, for all waste shipments transported by rail from the NorthStar Vermont Yankee site. The location of the subject shipments were verified and traced until their receipt at the destination facility. NorthStar Vermont Yankee and Waste Control Specialists tracked the progress of this shipment through the daily trace reports. At no time was the shipment lost or in an unknown location.

Below is the summary for both tank car shipments that exceeded the time provided in 10 CFR 20, Appendix G. The summary includes the tank car (Rail Car) identification (ID) number, shipment date, date of receipt at the Midlothian Texas transload facility, tank trailer shipment identification numbers, date of receipt at the Waste Control Specialists (WCS) disposal facility in Andrews, Texas, and the total number of days the shipment was in transit.

First Tank Car

Rail Car ID Number	Date Shipped	Date Received at Midlothian, TX	Tank Trailer Shipment Number	Date Received at WCS	Total Days In Transit
FURX125378	4/22/2019	5/22/2019	TSDF-8909-01	5/29/2019	37
			TSDF-8909-02	5/30/2019	38
			TSDF-8909-03	6/3/2019	42
			TSDF-8909-04	6/5/2019	44
			TSDF-8909-05	6/7/2019	46

Second Tank Car

Rail Car ID Number	Date Shipped	Date Received at Midlothian, TX	Tank Trailer Shipment Number	Date Received at WCS	Total Days In Transit
FURX123678	5/2/2019	5/22/2019	TSDF-8909-06	6/11/2019	40
			TSDF-8909-07	6/13/2019	42
			TSDF-8909-08	6/17/2019	46
			TSDF-8909-09	6/19/2019	48

The general issue of rail transit times has been initially documented in Condition Report CR-2019-139; corrective actions, as appropriate, are being tracked in that Condition report.

This letter contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Mr. Thomas B. Silko at (802) 451-5354, Ext 2506.

Sincerely,



CRD/tbs

cc: Mr. Jack D. Parrott, Senior Project Manager
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