



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

BYV 19-043

REC RG 11217*19AM06:00

10 CFR 20, Appendix G

December 12, 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 the transportation of various contaminated material shipped via 5 different 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 investigations, which were completed between the dates of December 2, thru December 12, 2019, determined that the shipments were traced on a daily basis by the various carriers such as the New England Central Railroad, CSX, Union Pacific (UP), and Texas & New Mexico Railway (TXN), the disposal facility of 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

On October 16, 2019, a gondola rail car consisting of one (1) package of asbestos containing contaminated material; one (1) package of miscellaneous debris and four (4) unpackaged contaminated components departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On October 16, 2019, a second gondola rail car consisting of three (3) packages of asbestos containing contaminated material and three (3) packages of contaminated debris departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On October 16, 2019, a third gondola rail car consisting of four (4) packages of asbestos containing contaminated material and three (3) packages of contaminated metal and debris departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On October 18, 2019, a gondola rail car consisting of three (3) containers of asbestos containing contaminated material, two (2) containers of debris and two (2) unpackaged contaminated components departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On November 7, 2019, a flat rail car consisting of one (1) freight container of metal debris and three (3) freight containers of asbestos containing contaminated material departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

The rail cars were released to the first railroad carrier (New England Central Railroad) on the dates identified above. After release from the NorthStar Vermont Yankee site, the rail cars were transported for 42, 49, 49, 54 and 32 days respectively before the shipments were received at the disposal facility.

NorthStar Vermont Yankee and Waste Control Specialists receive 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 receipt at the destination facility. NorthStar Vermont Yankee and Waste Control Specialists (WCS) tracked the progress of these shipments through the daily trace reports. At no time were the shipments lost or in an unknown location.

Below is the summary for the rail shipments 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 WCS	Total Days In Transit
TSDf-8982-12	ITFX526465	10/16/2019	11/27/2019	42
TSDf-9022-07				
TSDf-8910-08				

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8982-11	ITFX8013	10/16/2019	12/4/2019	49
TSDf-9022-06				

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8982-10	ITFX8015	10/16/2019	12/4/2019	49
TSDf-9022-05				

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8982-13	GACX9994	10/18/2019	12/11/2019	54
TSDf-9022-08				
TSDf-8910-09				
TSDf-8892-16				

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8910-13	GIMX516228	11/7/2019	12/9/2019	32
TSDf-8982-17				

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,

A handwritten signature in black ink, appearing to be 'G. R. M.' with a stylized flourish at the end.

CRD/tbs

cc: Mr. Jack D. Parrott, Senior Project Manager
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Mail Stop T-5A10
Washington, DC 20555

Ms. June Tierney, Commissioner
Vermont Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05602-2601



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Vermont Yankee Nuclear Power Station
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Corey R. Daniels
ISFSI Manager

10 CFR 20, Appendix G

BVY 20-001

January 6, 2020

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

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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.

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Investigation

On November 1, 2019, a gondola rail car consisting of two (2) containers of asbestos containing contaminated material, five (5) containers of miscellaneous debris and three (3) unpackaged contaminated components departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On November 5, 2019, a gondola rail car consisting of one (1) unpackaged contaminated component departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On November 5, 2019, a second gondola rail car consisting of one (1) unpackaged contaminated component departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On November 20, 2019, a gondola rail car consisting of one (1) unpackaged contaminated component, two (2) boxes of debris, and four (4) containers of asbestos containing contaminated material departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

On November 22, 2019, a flat rail car consisting of four (4) freight containers of asbestos containing contaminated material departed from the NorthStar Vermont Yankee site at 320 Governor Hunt Road in Vernon, Vermont to the Waste Control Specialists disposal facility in Andrews, Texas.

The rail cars were released to the first railroad carrier (New England Central Railroad) on the dates identified above. After release from the NorthStar Vermont Yankee site, the rail cars were transported for 42, 41, 41, 28 and 24 days respectively before the shipments were received at the disposal facility.

NorthStar Vermont Yankee and Waste Control Specialists receive 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 receipt at the destination facility. NorthStar Vermont Yankee and Waste Control Specialists (WCS) tracked the progress of these shipments through the daily trace reports. At no time were the shipments lost or in an unknown location.

Below is the summary for the rail shipments 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 WCS	Total Days In Transit
TSDf-8982-14	ITFX8016	11/1/2019	12/13/2019	42
TSDf-9022-09				
TSDf-8910-10				

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8910-11	ITFX526467	11/5/2019	12/16/2019	41

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8910-12	ITFX526469	11/5/2019	12/16/2019	41

Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-8910-14	ITFX8002	11/20/2019	12/18/2019	28
TSDf-9127-05				

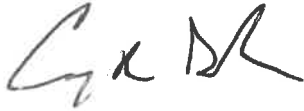
Shipment Number	Rail Car ID Number	Date Shipped	Date Received at WCS	Total Days In Transit
TSDf-9127-04	ECXX93295	11/22/2019	12/16/2019	24

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,

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Ms. June Tierney, Commissioner
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