



10 CFR 20, Appendix G

July 6, 2021

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

Pilgrim Nuclear Power Station
Renewed Facility License No. DPR-35
NRC Docket Nos. 50-293 and 72-1044

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

Pursuant to the provisions 10 Code of Federal Regulations (CFR) 20, Appendix G, Holtec Decommissioning International, LLC (HDI) is submitting a report to identify the results of the investigations performed relative to shipment and transport of low-level radioactive waste (LLRW) from Pilgrim Nuclear Power Station (PNPS) to the Waste Control Specialists, LLC (WCS) disposal facility in Andrews Texas. The LLRW shipments exceeded the 20-day time limit for notification of receipt from the disposal facility as specified in 10 CFR Part 20, Appendix G.

On May 6 and 7, 2021, Radwaste Shipment No., 21-123 and 124 were shipped via flatbed truck from PNPS to the Greenfield Logistics LLC transfer facility in Binghamton, NY for transload to rail and conveyance to the WCS waste disposal facility in Andrews, Texas. Pilgrim Radwaste shipping personnel were notified of railcar shipment arrival at WCS on June 11, 2021, for the 21-123 shipment and June 15, 2021, for the 21-124 shipment. The total transport time for these LLRW shipments was 36 and 39 days, respectively.

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."*



PNPS Site Radwaste Shippers initiated a trace investigation on May 26, 2021, for the 21-123 shipment and on May 27, 2021, for the 21-124 shipment. These trace investigations were completed on June 22, 2021. These investigations revealed that the LLRW shipments took a total of 36 and 39 days to complete transport from Pilgrim Station to the WCS waste disposal facility in Andrews, Texas. The trace investigations identified that there were no significant or unusual transport delays encountered.

Pilgrim Incident Report, IR-PIL-03086 was previously issued to document corrective actions relative to the general concern that site road to rail shipments from PNPS to WCS in Texas are expected to exceed the 20-day time constraint for investigation and report identified in 10 CFR 20, Appendix G.

This letter contains no new regulatory commitments.

If you have any questions or need further information, please contact me at (856) 797-0900, ext. 3813.

Sincerely,

Andrea L. Sterdis
HDI Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

Attachment – Pilgrim Station Radwaste Shipment Investigation Reports for LLRW Shipments 21-123 and 21-124

cc: (with Attachment)
NRC NMSS Project Manager (Pilgrim Nuclear Power Station)



HDI-PIL-21-078

Attachment 1

**Pilgrim Station Radwaste Shipment
Investigation Reports for LLRW Shipments 21-123 and 21-124**

LLRW Shipment Exceeded 20-Days

(5 total pages including cover page)

Pilgrim Station Radwaste Shipment Investigation Report 21-123

Report #: 21-123

Revision #: 0

Investigation Start Date: 5/26/2021

Investigation Report Completion Date: 6/22/2021

Conclusion: No unusual or significant shipping delays were identified for the referenced shipment. The 20-day time limit identified in 10 CFR 20, Appendix G, for initiating an investigation when shipment receipt notification is not provided from the waste disposal facility, is too conservative for road to rail shipments originating from Pilgrim Nuclear Power Station (PNPS) and transported to Waste Control Specialists,(WCS) disposal facility located in Andrews, Texas. An Incident Report (IR-PIL-03086) was written to document the issue of not meeting the 20-day report notification time limit. A corrective action was assigned to draft a proposed exemption from the 10 CFR 20, Appendix G, 20-day investigation and report time constraints.

Shipping Report Details:

Shipment Current Status: Received

Shipment Start Date: 5/6/2021

Shipment Id # : 21-123

Shipment Item Description: (8) Nine Yard Bags of Non-Compactible Trash

Destination : WCS , Andrews TX

Shipping Companies Involved:

Highway Transporters:

Carrier: Interstate Ventures

Carrier: Greenfield Logistics, LLC

Rail Transporter #1: NYSW Rail Yard to Norfolk Southern Railroad

Carrier: New York, Susquehanna, & Western Railway

Rail Transporter #2: Binghamton, NY to Clearing, IL

Carrier: Norfolk Southern Railroad

Rail Transporter #3: Clearing, IL to Lubbock, TX

Carrier: BNSF

Rail Transporter #4:

Carrier: Lubbock & Western Railway (LBWR)



Shipment Duration: 39 days

Shipping Problems or Delays: Typical delays with transload logistics and receiving facility schedule.

Shipment Tracking Start date: 5/6/2021

Shipment Receipt Date: 6/11/2021

WCS Shipment Receipt Notification to Shipper: E-mail notification on 6/11/2021

Investigation Preparer: Joseph Voegtli, PNPS Radwaste Shipper

Investigation Reviewer: Jim Buckley, CDI Waste Management Lead PNPS

Pilgrim Station Radwaste Shipment Investigation Report 21-124

Report #: 21-124

Revision #: 0

Investigation Start Date: 5/27/2021

Investigation Report Completion Date: 6/22/2021

Conclusion: No unusual or significant shipping delays were identified for the referenced shipment. The 20-day time limit identified in 10 CFR 20, Appendix G, for initiating an investigation when shipment receipt notification is not provided from the waste disposal facility, is too conservative for road to rail shipments originating from Pilgrim Nuclear Power Station (PNPS) and transported to Waste Control Specialists,(WCS) disposal facility located in Andrews, Texas. An Incident Report (IR-PIL-03086) was written to document the issue of not meeting the 20-day report notification time limit. A corrective action was assigned to draft a proposed exemption from the 10 CFR 20, Appendix G, 20-day investigation and report time constraints.

Shipping Report Details:

Shipment Current Status: Received

Shipment Start Date: 5/7/2021

Shipment Id #: 21-124

Shipment Item Description: DAW non-compactible trash

Destination: WCS, Andrews TX

Shipping Companies Involved:

Highway Transporters:

Carrier: Interstate Ventures

Logistics: Greenfield Logistics, LLC

Rail Transporter #1: NYSW Rail Yard to Norfolk Southern Railroad

Carrier: New York, Susquehanna, & Western Railway

Rail Transporter #2: Binghamton, NY to Clearing, IL

Carrier: Norfolk Southern Railroad

Rail Transporter #3: Clearing, IL to Lubbock, TX

Carrier: BNSF

Rail Transporter #4:

Carrier: Lubbock & Western Railway (LBWR)



Shipment Duration: 39 days

Shipping Problems or Delays: Typical delays with transload logistics and receiving facility schedule.

Shipment Tracking Start date: 5/7/2021

Shipment Receipt Date: 6/15/2021

WCS Shipment Receipt Notification to Shipper: E-mail notification on 6/15/2021

Investigation Preparer: Joseph Voegtli, PNPS Radwaste Shipper

Investigation Reviewer: Jim Buckley, CDI Waste Management Lead PNPS