



10 CFR 20, Appendix G

February 2, 2024

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

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 45-day time limit for notification of receipt from the disposal facility as authorized for Pilgrim Station in NRC Approved Exemption from 10 CFR Part 20, Appendix G, and dated October 18, 2021 (ML21267A520).

On December 14, 2023, Radwaste Shipment No., 23-154, 23-155 and 23-156 were shipped via flatbed truck from PNPS to the Intransit Transload facility in Mansfield, Ma for transload to rail and conveyance to the WCS waste disposal facility in Andrews, Texas. These shipments consisted of (4) 20' sealand containers shipped via a flatcar conveyance, SOXX20510. Pilgrim Radwaste shipping personnel were notified of SOXX20510 railcar receipt at WCS on January 30, 2024. The total transport time for the conveyance of the LLRW shipments was 48 days.

PNPS Site Radwaste Shippers receive daily tracking reports from the logistics contractor, ICE Service Group, Inc., for all waste shipped through the Intransit Transload facility. The location of the SOXX20510 flatcar was verified daily and traced until receipt at the WCS facility in Andrews, Tx. At no time was the flat car lost or in an unknown location.

Pilgrim Incident Report, PIL-07050 was issued to document actions relative to this late shipment receipt from PNPS to WCS in Texas.

This letter contains no new regulatory commitments.



If you have any questions or need further information, please contact me at (856) 797-0900, ext. 3587.

Sincerely,

William Noval
Director, Regulatory Affairs
Holtec Decommissioning International, LLC

Attachment – Pilgrim Station Radwaste Late Shipment Investigation Report for LLRW
Shipments 23-154, 23-155, and 23-156

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



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HDI-PIL-24-002

Attachment 1

**Pilgrim Station Radwaste Late Shipment
Investigation Report for LLRW Shipments 23-154, 23-154, and 23-156**

Pilgrim Station Radwaste Late Shipment Investigation Report

Report #: 23-154, 23-155 and 23-156

Revision #: 0

Investigation Start Date: 1/26/2024

Investigation Report Completion Date: 1/30/2024

Conclusion: No unusual or significant shipping delays were identified for the referenced shipment. The 45-day time limit identified in the site exemption from 10 CFR 20, Appendix G reporting time limits was exceeded due to congestion at the Waste Control Specialists (WCS) rail spur facility. This resulted in a delay in waste shipment receipt at the WCS facility in Andrews, Texas. The site was informed of shipment status and was tracked in accordance with site shipping procedures for the duration of the shipment. An Incident Report (PIL-07050) was written to document the issue of not meeting the 45-day report notification time limit established in the NRC approved exemption from 10 CFR 20, Appendix G.

Shipping Report Details:

Shipment Current Status: Received

Shipment Start Date: 12/14/2023

Shipment Id # : 23-154, 23-155 and 23-156

Shipment Item Description: Four (4) 20' Sealand containers of LLRW

Destination : WCS LLRW facility in Andrews, TX

Shipping Companies Involved:

Initial Carrier : Goulet Trucking

Rail Transporter #1: CSX Transportation, Inc.

Rail Transporter #2: Union Pacific Railroad and Norfolk Southern Railroad

Rail Transporter #3: Watco Companies LLC DBA Texas and New Mexico Railway

Shipment Duration: 48 days

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

Shipment Tracking Start date: 12/14/2023

Shipment Receipt Date: 1/30/2024

Shipment Receipt Notification to Shipper: E-mail notification on 1/30/2024

Investigation Preparer: Joseph Voegtli, PNPS Radwaste Shipper

Investigation Reviewer: Jim Buckley, HDI Waste Management Lead PNPS