

71-9218



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UFC:5822.00

March 17, 2005

Mr. Meraj Rahimi, Project Manager
NMSS/SFPO MS/013D13
U.S. Nuclear Regulatory Commission
One White Flint North
15555 Rockville Pike
Rockville, MD 20852-2738

Subject: REPORT PURSUANT TO 10 CFR 71.95(c)

Dear Mr. Rahimi:

On behalf of the U.S. Department of Energy Carlsbad Field Office (CBFO), this letter is submitted to report a condition as required by Title 10, Code of Federal Regulations, Part 71.95(c) regarding the use of Transuranic Package Transporter Model II (TRUPACT-II) Unit Number 159. This packaging operates under the U.S. Nuclear Regulatory Commission Certificate of Compliance Number 9218.

(1) A brief abstract describing the major occurrences during the event, including all component or system failures that contributed to the event and significant corrective action taken or planned to prevent recurrence:

TRUPACT-II 159, part of shipment RF050017 from Rocky Flats Environmental Technology Site (RFETS), contained Standard Waste Box (SWB), S04573. This SWB was mislabeled and incorrectly entered as SWB S04753 in the Payload Container Transportation Certification Document (PCTCD) and the Payload Assembly Transportation Certification Document (PATCD). Therefore the shipment was non-compliant with the requirements of Certificate of Compliance Number 9218. There was no safety consequence as a result of this event.

To prevent recurrence, an investigation was conducted. It was determined that the cause of the incident was an inadequate process for replacing damaged SWB labels.

(2) A clear, specific, narrative description of the event that occurred so that knowledgeable readers conversant with the requirements of part 71, but not familiar with the design of the packaging, can understand the complete event. The narrative description must include the following specific information as appropriate for the particular event:

The identification label on SWB S04573 was damaged at RFETS and a replacement label with the incorrect number (S04753) was placed on the SWB. This SWB was shipped to WIPP on January 11, 2005, received on January 12, 2005, and emplaced in the underground on January 13, 2005.

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On January 18, 2005, RFETS personnel discovered that SWB S04753 was still located at RFETS in Building 440. All shipment, inspection, and certification documentation indicated that SWB S04753 had been shipped to WIPP on January 11, 2005. Further investigation revealed that mislabeling had occurred. RFETS notified WTS and the CBFO of the event on January 19, 2005.

(2)(i) Status of components or systems that were inoperable at the start of the event and that contributed to the event;

No components or systems were inoperable at the start of the event.

(2)(ii) Dates and approximate times of occurrences;

WTS was notified of the occurrence on January 19, 2005.

(2)(iii) The cause of each component or system failure or personnel error, if known;

No component or system failure occurred.

(2)(iv) The failure mode, mechanism, and effect of each failed component, if known;

No components failed.

(2)(v) A list of systems or secondary functions that were also affected for failures of components with multiple functions;

No systems or secondary functions failed.

(2)(vi) The method of discovery of each component or system failure or procedural error;

The non-compliance was discovered at RFETS during a pre-shipment payload preparation inspection for a subsequent shipment to WIPP.

(vii) For each human performance-related root cause, a discussion of the cause(s) and circumstances;

The non-compliance was caused by failure to verify that the correct replacement barcode label was applied to the SWB with the damaged label.

(2)(viii) The manufacturer and model number (or other identification) of each component that failed during the event; and

Manufacturer and model numbers associated with component failure are not applicable.

(2)(ix) For events occurring during use of a packaging, the quantities and chemical and physical form(s) of the package contents.

Container Number RFS04573:

<u>Nuclide</u>	<u>Activity (ci)</u>
AM-241	.6498
NP-237	.000005635
PU-238	.1763
PU-239	3.754
PU-240	.8600
PU-241	21.99
PU-242	.00001087

Waste Material Parameters:

<u>Material Parameter</u>	<u>Estimated Weight (kg)</u>
Iron Base Metal Alloys	340.71
Other Metal/Alloys	114.00
Cellulosics	11.05
Plastics	16.44
Steel Container Materials	290.30
Plastic Liners	19.20

(3) An assessment of the safety consequences and implications of the event. This assessment must include the availability of other systems or components that could have performed the same function as the components and systems that failed during the event.

There were no safety consequences relating to the non-compliant event because both SWBs, S04753 and S04573 were certified in accordance with the requirements of the TRUPACT-II Certificate of Compliance and TRAMPAC with either configuration of boxes the TRUPACT-II payload shipment is compliant. Shipment RF050017 was made without incident. Availability of other systems or components is not applicable.

(4) A description of any corrective actions planned as a result of the event, including the means employed to repair any defects, and actions taken to reduce the probability of similar events occurring in the future.

The following corrective actions were taken or planned to prevent recurrence.

- All TRU Waste TRUPACT-II loading and shipping was put on hold at RFETS until the incident was investigated
- A manager's meeting was held to investigate and determine the cause of the incident
- RFETS personnel performed a 100 percent inventory of all SWBs located in Building 440 (the facility from which the waste shipment originated). It was determined that SWB S04753 was at RFETS and was properly labeled
- The shipper performed a physical verification of the Tamper Indicating Device (TID) and the TID Application and Removal Log

- The shipper made internal notifications to the applicable RFETS organizations, CBFO, and WIPP
- The shipper compiled copies of the characterization information and shipping records for SWB S04573 and transmitted the information to WIPP
- The shipper notified WIPP Waste Information System (WWIS) personnel that the errant information transmitted for SWB S04753 should be replaced with the correct information applicable to SWB S04573
- RFETS included a check in the Facility Senior Supervisory Watch to verify that all barcodes match the Payload Assembly Transportation Certification Document until Operations Order OO-440-052 is revised
- The shipper formalized a process for changing labels on waste containers and evaluated the process for printing WIPP barcode labels
- The shipper revised the Solid Radioactive Waste Inspection procedure to include verification of all barcodes as a checklist item
- The shipper revised the Waste Certification Shipment File, the Waste Operations Shipment File, and the Traffic Shipment File in the Waste Records Center by removing the information for SWB S04753 and inserting the correct information

(5) Reference to any previous similar events involving the same packaging that are known to the licensee or certificate holder.

There have been no similar or known events involving the same packaging by the certificate holder.

(6) The name and telephone number of a person within the licensee's organization who is knowledgeable about the event and can provide additional information.

Contact Mr. D. R. Kump, WIPP Information System Manager at (505) 234-7230.

(7) The extent of exposure of individuals to radiation or to radioactive materials without identification of individuals by name.

There were no exposures to individuals as a result of the event.

If you have any questions or require additional information regarding this report, please contact me at (505) 234-7469.

Sincerely,


P. C. Gregory, Manager
Packaging

TES:bdb

cc: A. Holland, CBFO
M. A. Italiano, CBFO