

71-9218



TP:05:0027
UFC:5822.00

June 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

Dear Mr. Rahimi:

On behalf of the U. S. Department of Energy Carlsbad Field Office (CBFO), this letter is submitted to report a condition pursuant to 10 CFR 71.95 regarding the use of TRUPACT-II container unit number 140. 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:

There were no major occurrences during the event. There were no component or system failures that contributed to the event. A 12-inch Pipe Overpack Container (POC) assembly, POC31414, in TRUPACT-II unit 140, shipment RL4007, was shipped from the Hanford Site to the Waste Isolation Pilot Plant (WIPP) with more Plutonium 239 fissile gram equivalent (FGE) than was identified and recorded on the applicable Payload Container Transportation Certification Document (PCTCD) and Payload Assembly Transportation Certification Document (PATCD). The PCTCD listed 58 FGE and the actual amount shipped was 144 FGE. The TRUPACT-II Certificate of Compliance limit of 200 FGE for a POC was not exceeded. Significant corrective actions include a review of shipping records, evaluation of data for compliance with TRAMPAC requirements, assessment of applicable procedures, procedure changes and additional certification official training.

(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:

On April 20, 2005, Hanford personnel discovered that the verified data for POC 31414 reflected the contents as three billet cans as opposed to the data reported and used to compile the documentation for the applicable PCTCD and PATCD for TRUPACT-II #140 in shipment RL40027.

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The original report used to compile the data for the PCTCD and PATCD for POC 31414 reflected the data for only two billet cans. The shipment arrived at the Waste Isolation Pilot Plant on May 21, 2004. The POC was emplaced at WIPP on May 22, 2004. On April 20, 2005 Hanford Site personnel notified the certificate holder that an incomplete report was used to compile the data for the PCTCD and PATCD for POC 31414 in TRUPACT-II #140 which was part of shipment RL40027.

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

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

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

Date and Time Discovered: April 20, 2005, Mountain Standard Time 16:00

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

No components or systems failed. Hanford Site Management is investigating any personnel related errors that may have contributed to the event.

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

This criterion is not applicable to the event.

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

This criterion is not applicable to the event.

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

The non-compliance was discovered during a records review by Hanford Site personnel.

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

The cause of the non-compliance was failure to correct preliminary data entries. The certification official did not reconcile the PCTCD and the PATCD data with the final shipping document data.

(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.

Radionuclides:

<u>Nuclide</u>	<u>Activity (Ci)</u>
Americium 241	1.040E+01
Neptunium 237	8.360E-05
Plutonium 238	2.010E+00
Plutonium 239	8.460E+00
Plutonium 240	3.680E+00
Plutonium 241	7.040E+01
Plutonium 242	9.850E-04
Uranium 234	3.610E-04
Uranium 235	1.200E-05
Uranium 238	1.090E-03

Physical and Chemical Form:

<u>Description</u>	<u>Weight (kg)</u>
Steel container materials	114.99
Cellulose packing materials	35.00
Plastic/liner container materials	5.00
Other inorganic materials	4.51

(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 event; all of the TRUPACT-II Certificate of Compliance limits were met. There were no systems or components that could have performed the same function as the components and systems that failed during the event.

(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.

- Additional records were reviewed to determine the extent of this condition – the occurrence is an isolated event
- Data was evaluated for compliance with TRAMPAC requirements – no limits were exceeded
- Applicable Waste Certification procedures are being assessed for adequacy and will be revised as necessary
- The certification officials have received additional training

(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.

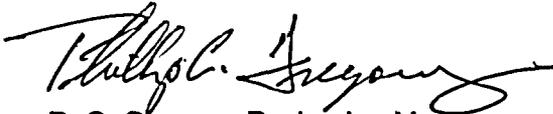
D. R. Kump, Manager, WIPP Information System, (505) 234-7230

(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) 234-7463.

Sincerely,



P. C. Gregory, Packaging Manager

bdb

cc: D. J. Ashworth, DOE
M. S. French, DOE
R. Goldsmith, DOE
A. Holland, CBFO
M. A. Italiano, CBFO