

71-9218



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August 8, 2006

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 184. 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. On June 8, 2006, a 7-pack of 55-gallon drums and a 7-pack of 55-gallon dunnage drums in TRUPACT-II unit 184, shipment IN060359, was shipped from the Idaho National Laboratory (INL) to the Waste Isolation Pilot Plant (WIPP) under the requirement of a 60-day shipping period rather than the correct requirement of a 10-day controlled shipping period. The error was discovered en route and corrective action was taken to revise the Payload Container Transportation Certification Document (PCTCD), Payload Assembly Transportation Certification Document (PATCD), and complete the Site Control Checklist for Controlled Shipments (SCCCS) to invoke a 10-day controlled shipment and certify that the shipment was compliant with the required 24-hour loading time. Upon receipt at WIPP, procedures for a 10-day controlled shipment were correctly followed and the shipment was compliant with the 24-hour unloading time requirement. The overall shipping duration, including unloading at WIPP, was 3 days. The error reporting is specific to the failure to correctly identify the shipment as controlled on the PCTCD and PATCD documents and failure to complete the SCCC prior to the departure of the shipment from INL.

Corrective action has been taken to ensure that all payload containers that require 10-day controlled shipments are assigned default shipping categories for 10-day shipments. This will ensure controlled shipments are properly identified in the future.

(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:

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On June 9, 2006, Washington TRU Solutions (WTS) personnel identified that the subject shipment left INL with payload certification records that did not correctly invoke the requirements of a 10-day controlled shipment. WTS personnel questioned the shipping duration of the subject shipment relative to previous shipments from the same waste stream. As a result, the INL transportation certification official (TCO) was contacted and a determination was made that the shipment required a 10-day controlled shipped period. Upon discovery, the condition was corrected by revising payload certification documents that invoke the 10-day controlled shipping period, contacting affected personnel at the Waste Isolation Pilot Plant (WIPP) responsible for tracking en route and processing the receipt of the package, and ensuring that the shipment be treated in accordance with all 10-day controlled shipment requirements. The total duration of the shipment including unloading at WIPP was 3 days.

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

This criterion is not applicable to the event because there were no components or systems that were inoperable at the start of the event.

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

Date and time of occurrence: June 8-10, 2006, time not recorded.

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

No components or systems failed. Personnel failed to correctly correlate the shipping category with the required shipping period.

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

This criterion is not applicable to the event because no components failed.

(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 because no components failed.

(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 WTS 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 designate the shipment as a 10-day controlled shipment consistent with the requirements of the CH-TRAMPAC.

(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 because no components failed.

(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>
PU-241	2.242E+00
PU-239	9.618E-01
PU-240	2.069E-01
AM-241	1.200E-01
PU-238	5.658E-02
PU-242	1.530E-05
U-234	5.985E-06
NP-237	4.353E-06
U-235	1.890E-07
SR-90	1.792E-07
CS-137	1.629E-07

Physical and Chemical Form:

<u>Description</u>	<u>Weight (kg)</u>
Solidified Organic Material (transuranic waste)	1,491.8
Steel Container Materials	380.8
Plastic/liner container materials	52.5
Other inorganic materials	8.3
Plastics	7.0

(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 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 CH-TRAMPAC requirements – no limits were exceeded.
- Corrective action has been taken to ensure that all payload containers that require 10-day controlled shipments are assigned default shipping categories for 10-day shipments.
- 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 Waste 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) 234-7469.

Sincerely,



P. C. Gregory, Manager
Packaging

bdb

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