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December 28, 2006

71-9218

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 this letter is submitted to report a condition pursuant to 10 CFR 71.95 (italicized below) regarding the use of TRUPACT-II number 198. This packaging operates under the U.S. Nuclear Regulatory Commission (NRC) 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:

During receipt processing of TRUPACT-II number 198 which comprised a portion of shipment SR060123 personnel from Washington TRU Solutions (WTS) Integrated Waste Operations (IWO) noted that the Ten Drum Overpack (TDOP) unique identification number label did not match the unique identification number listed on the WIPP Waste Information System (WWIS) Shipment Summary Report. There were no major occurrences during the event and no component or system failures that contributed to the event. The shipper (Savannah River Site) issued a nonconformance report and is in the process of reviewing and revising their procedure as appropriate to prevent recurrence. The revision to the procedure will focus on the sequence of unique identification number verification and training of the affected personnel to ensure this type of event does not occur again.

(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 NRC Certificate of Compliance number 9218, Revision 18 issued for the TRUPACT-II states in Section 8, "Payload containers within a package shall be selected in accordance with CH-TRAMPAC, Rev. 2, Section 6.0". Section 6.2.1.1 of the CH-TRAMPAC references the user back to CH-TRAMPAC Section 2.4 for container identification number requirements. Section 2.4.2 of the CH-TRAMPAC states "Compliance shall be through visual inspection of each payload container and dunnage and the unique identification number /label shall be recorded on the PCTCD {Payload Container Transportation Certification Document} or the OPCTCD {Overpack Container Transportation Certification Document}."

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On November 3, 2006, during receipt processing of TRUPACT-II number 198 on shipment number SR060123 WTS IWO personnel noted that unique identification number label on the TDOP in TRUPACT-II did not match unique identification number listed on the WWIS Shipment Summary Report. The WWIS Shipment Summary Report was reviewed to verify the WWIS Shipment Summary Report reflected the same unique identification number that was listed on the CH-TRAMPAC required OPCTCD for TRUPACT-II number 198 in shipment SR060123. All other conditions required for the operation and shipment of the package in accordance with the certificate of compliance were adhered to.

The authorized contents were correctly described on the PCTCD and the OPCTCD. The only discrepancy was a "9" in place of a "0" on the overpack label.

(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;

November 3, 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 properly record the correct unique identification number due to focusing on only the last 4 digits of a 5 digit number.

(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 by WIPP personnel during review of records for an SRS shipment.

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

The cause of the non-compliance was a failure of the SRS Transportation Certification Official to verify that all 5 digits of the unique identification number label matched those listed on the OPCTCD prior to loading the TDOP in to the TRUPACT-II.

(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:

Nuclide	Activity(ci)	Percent
AM-241	1.2216960000	6.71
AM-243	0.0000008730	0.00
BI-214	0.0000000309	0.00
CM-243	0.0000004110	0.00
CO-60	0.0000000115	0.00
CS-137	0.0000000119	0.00
NA-22	0.0000009334	0.00
NP-237	0.0000120441	0.00
PB-214	0.0000000814	0.00
PU-238	0.2948300000	1.62
PU-239	4.1048850000	22.54
PU-240	0.9543300000	5.24
PU-241	11.6352000000	63.89
PU-242	0.0000525970	0.00
SR-90	0.0000000119	0.00
TL-208	0.0000019581	0.00
U-232	0.0000000300	0.00
Totals:	18.2110099942	100.00

Physical and Chemical Form:

Description	Weight (kg)
Steel Container Materials	725.60
Iron Base Metal Alloys	390.70
Plastics	223.00
Other Inorganic Materials	60.10
Cellulosics	13.50
Rubber	9.10
Aluminum Base Metal/Alloys	0.20
Total:	1,422.20

(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 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.

- Review of procedure CCP-TP-033 for revision as applicable to help prevent recurrence
- Training of affected personnel to any applicable changes to the revised procedure

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

A mislabeled 55-gallon drum was identified on March 19, 2002 (see report dated April 1, 2002). A mislabeled standard waste box was identified on January 18, 2005 (see report dated March 17, 2005).

(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.

M. W. Pearcy, Manager, WTS Central Characterization Project, Project Certification, (505) 234-7394
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:jm

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