

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9218

Page 1 of 3

Package Model No.: TRUPACT-II

Report Submitted By: Washington TRU Solutions LLC

Report Date: June 14, 2010

Review the incoming report to determine if additional Commission or staff action is warranted. The review should consider whether the report identifies a generic defect or problem with the package design and the safety significance of the issue. Note that a high safety significance represents a potential for significant radiation exposure, medium safety significance represents a potential for some moderate radiation exposure, and low safety significance represents little or no potential for radiation exposure.

1. The report identifies:

- Significant reduction in the effectiveness of a package during use;
- Defect with a safety significance;
- Shipment in which conditions of the approval were not observed.

2. What is the safety significance? High Medium Low

3. Summary of the report:

On April 26, 2010, Condition 8 of Certificate of Compliance (CoC) No. 9218 was not followed in their entirety in that during loading at the Richland Hanford Site (RL) payloads were loaded into the wrong packages. Payload assembly SWB0142 was certified to be loaded into TRUPACT-II 131 but was inadvertently loaded into TRUPACT-II 184. Payload assembly SWB0141 was certified to be loaded into TRUPACT-II 184 but was inadvertently loaded into TRUPACT-II 131. Both payload assembly SWB0142 and payload assembly SWB0141 were approved for shipment in compliance with all limits described in CoC No. 9218 and the CH-TRAMPAC. However, the MLT personnel did not comply with the applicable payload procedures that require a payload assembly to be loaded in the TRUPACT-II that is specified on the Payload Assembly Transportation Certification Document (PATCD). In the PATCD, under the "Identification Parameters" section, the second data line requires the Transportation Certification Official to enter the serial number of the "Packaging OCA Body/Lid" that the certified payload assembly will be loaded into. As the payloads were not placed in the packages that they were documented and signed for on their PATCDs, this resulted in a non compliant condition.

This error was detected when the payloads were unloaded at the WIPP Site. There were no major occurrences during the event. The error was due to personnel failure to follow the payload procedure and was not due to any major component or system failures.

4. Corrective actions taken by the licensee:

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9218

Page 1 of 3

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The following corrective and preventive measures were taken by the licensee:

- Shipments from RL were suspended.
- A representative from the Mobile Loading Team (MLT) was required to be stationed directly on the loading platform during loading activities at RL.
- A senior management member of MLT traveled from Carlsbad, NM, to the loading site at RL to ensure payloads were being loaded correctly and that the responsible MLT members were stationed on the loading platform during loading activities.
- An internal standing order was issued that requires a qualified member of the MLT to verify the correct payload assembly identification number and the shipping package identification number via a signed entry into the operations logbook until the applicable payload operations procedures can be revised to include a more robust verification step.
- Refresher training was conducted for MLT members on the requirements of the applicable procedure for verifying each payload assembly is loaded into the specified shipping package.
- Shipments RL100026 and RL100027 (which were assembled and approved for shipment) were disassembled to confirm each payload assembly was loaded into the correct shipping package prior to reassembling and released for shipment.
- Revise the DOE/CBFO CH Packaging Operations Manual to include a more robust method for verification and signoff that will ensure that the specified payload assembly is loaded into the specified shipping package during the loading process.
- CBFO will review and approve changes to the applicable payload procedures to verify that the increased requirements from the DOE/CBFO CH Packaging Operations Manual for verification of the payload assemblies being loaded have been incorporated prior to the applicable payload procedures being implemented.

5. Staff comments:

None.

6. Staff conclusion:

- The report does NOT identify generic design or license/certificate issues that warrant additional Commission or staff action. This report is considered closed.

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9218

Page 1 of 3

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- There is a need to take additional action. Provide a summary of the bases and recommended actions:

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