# 10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9218
Package Model No.: TRUPACT-II

**Report Submitted By:** T. E. Sellmer, Washington TRU Solutions

Report Date: September 26, 2012

Report ADAMS Accession No.: ML12275A416

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:

 Si	gnifica	ınt redu	ıction	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 \_\_ \( \sqrt{\sqrt{}} \) Low

### 3. Summary of the report:

Washington TRU Solutions (WTS) submitted a letter dated September 26, 2012, reporting non-compliance with Certificate of Compliance (CoC) No. 9218 for the Model No. TRUPACT-II transportation package on behalf of the Department of Energy Carlsbad Field Office. WTS determined that for a shipment on August 30, 2012, the o-ring seal for the outer containment vessel test port plug was installed on the outer containment vent port plug.

During inspection and cleaning of the outer containment components at the Waste Isolation Pilot Plant (WIPP) on August 24, 2012, the o-ring seal on the outer containment test port was installed on the vent port plug. This error was not caught prior to the shipment on August 30. Prior to shipment to WIPP, all required pre-shipment leak tests were performed and all acceptance criteria for the tests were met.

Human error in that the incorrect o-ring was installed on the vent port on the outer containment vessel caused the non-compliance. The non-compliance was noticed during routine review of the packaging maintenance records.

### 4. Corrective actions taken by the licensee:

The following actions were taken to preclude recurrence:

- Loading and unloading team operators at Los Alamos National Laboratory and their supervisors were notified of the incorrect o-ring installation,
- A review of applicable procedures and applied controls were initiated to ensure that there were no deficiencies or discrepancies,
- Review of maintenance records were performed to determine extent of condition for additional packagings,
- All qualified operators are being given additional training on procedures, and
- Enhanced Operator aids, shadow boards, are being procured for placement of components during the disassembly and cleaning operations.

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#### 5. Staff comments:

Two shipments in 2007 and two shipments in 2011, were made in which o-rings were not properly installed in accordance with the certificate of compliance. This does not indicate a trend, given that the other occurrences were 4 years apart and there were only five instances over a 6-year period.

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

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