

# 10 CFR 71.95 REPORT EVALUATION FORM

**Docket No.:** 71-9218  
**Package Model No.:** TRUPACT-II  
**Report Submitted By:** T. E. Sellmer, Nuclear Waste Partnership LLC (NWP)  
**Report Date:** June 11, 2015  
**Report ADAMS Accession No.:** ML15169B101

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:

This report is regarding a shipment which was a subset of previously identified noncompliances submitted earlier (ADAMS Accession Nos. ML14223A796, ML14281A026, and ML15169B101) regarding shipments of Model No. TRUPACT-II packages where Condition No. 6 of Certificate of Compliance (CoC) No. 9218 was not followed in its entirety. In this subset of the shipments, Condition No. 7 of the CoC was also not followed in its entirety. Condition No. 7 states that, “[e]ach payload container must be assigned to a shipping category in accordance with CH-TRAMPAC...[f]or a payload assembly made up of payload containers with the same shipping categories, each payload container and payload assembly ... must be tested for gas generation in accordance with CH-TRAMPAC...”

Shipments from Los Alamos National Laboratory to the Waste Isolation Pilot Plant and to Waste Control Specialists contained 8 containers that were assigned incorrect CH-TRUCON codes and payload shipping categories. Specifically, the containers were assigned incorrect waste stream CH-TRUCON codes and payload shipping categories. Although they used incorrect CH-TRUCON codes and payload shipping categories, an independent CH-TRAMPAC compliance evaluation of the flammable gas generation requirements was performed against the correct code assignments and showed that the drums were in compliance with the flammable gas generation requirements.

## 4. Corrective actions taken by the licensee:

Corrective actions listed in earlier reports:

- All changes to approved waste treatment processes and chemical compatibility for waste assigned to approved CH-TRUCON codes must be approved by CH-TRU PE prior to implementation.

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- All personnel performing waste treatment processes for waste assigned an approved CH-TRUCON code have received additional training on applicable CH-TRAMPAC requirements.
- Establishment of increased oversight of waste treatment processes.

**Additional Corrective Actions:**

- Additional documentation will be required for the basis for waste stream assignments for individual containers.
- Enhanced review cycles will be implemented for determining waste stream assignments for individual containers, thereby ensuring the assignment of the CH-TRUCON code and payload shipping category associated with the correct waste population.

**5. Staff comments:**

The staff has reviewed the certificate holder's report, and its evaluation of the incident, and it agrees that the safety significance of the event is minor. The staff finds that the certificate holder's corrective actions should be sufficient to prevent future occurrences.

**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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 R. Powell, RI      S. Walker, II      M. Kunowski, III      J. Whitten, IV  
 R. Boyle and M. Conroy, Department of Transportation  
 R. Sun and A. McIntosh, Project Manager

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