

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9218

Package Model No.: TRUPACT-II

Report Submitted By: T.E. Sellmer, Manager, Packaging and Information Services, Nuclear Waste Partnership LLC (on behalf of the U.S. Department of Energy)

Report Date: May 9, 2022.

Report ADAMS Accession No.: ML22333B029

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

The subject report, "REPORT PURSUANT TO 10 CFR 71.95," dated May 9, 2022, describes that the NRC CoC No. 9218, Revision 25, states in Condition 5(b)(1) that flammable organics and methane are limited along with hydrogen to ensure the absence of flammable gas mixtures in TRU waste payloads, as described in chapter 5.0 of the CH-TRAMPAC, Rev. 5. Chapter 5.0 of the CH-TRAMPAC limits flammable volatile organic compounds (FVOCs) along with hydrogen to ensure the absence of flammable gas mixtures in transuranic (TRU) waste payloads. The site project manager identified that one of the site containers had not been captured on the nonconformance report and this resulted in the TRUPACT-II shipment of a container, Container No. LA00000077252, not being subject to flammable gas analysis (FGA) to quantify its total FVOC concentration. NWP described in the subject report that there were no exposures to individuals as a result of this event.

3. Corrective actions taken by the licensee:

In the subject report, NWP also described the following corrective/preventive actions:

- a. the site project manager validated that each certified container at every generator site has a valid FGA batch data report (BDR).
- b. operations were paused at all active centralized characterization program (CCP) locations, with CCP FGA operations formally stopped.
- c. a compensatory action is being implemented to verify that all containers have a valid FGA BDR to prevent recurrence in the interim until the root causal analysis and long-term corrective actions are complete.

In addition to the corrective actions described above, CCP described that it will be implementing corrective actions to strengthen current formal controls and formalize existing informal controls to address the vulnerability factors.

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5. Staff comments:

The staff reviewed the subject report dated May 9, 2022, as described above and finds the corrective actions that have been and will be implemented provide reasonable to prevent reoccurrence of this event. Therefore, the staff did not find significant safety issues associated with this event.

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: