

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9215
Package Model No.: NPI-20WC-6 MkII
Report Submitted By: J. L. Fogle, Neutron Products, Inc.
Report Date: January 25, 2013
Report ADAMS Accession No.: ML13030A042

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:

During an inspection of the Neutron Products Ranson, WV, facility by the Nuclear Regulatory Commission from November 26-29, 2012, non-conforming components were identified. The components were metal lids on the steel shell used on the overpack. The serial numbers for these overpack lids (OP) were OP-8, OP-10A, OP-11, OP-12, OP-13, and OP-14. Each non-conforming overpack lid had nuts and bolts installed in holes on the corners of angle iron on top of the lids. The nuts and bolts in question had been installed and left in place as evidenced by the fact that they were painted along with the rest of the overpack. The nuts and bolts prevent the angle iron from being used to lift the package during transport as required by 10 CFR 71.45(a). However, because the nuts and bolts are not shown on an approved drawing, they should be removed during storage. Consequently, their presence during storage created a non-conformance.

In addition, steel angles on top of metal lids OP-12, OP-13, and OP-14 were found to be incorrectly oriented. Drawing 240116, Rev. G, shows the upright leg of the angle iron to the right of the horizontal leg of the angle iron. However, for metal lids OP-12, OP-13, and OP-14, the upright leg is to the left of the horizontal leg of the angle iron. These angle irons add structural integrity to the overpack metal lid when the metal lid is lifted during loading and unloading operations.

4. Corrective actions taken by the licensee:

All overpack metal lids were tagged as non-conforming and removed from service. Nonconformance report 2012-005 was initiated on November 29, 2012, to remove all nuts and bolts from the angle irons, and it was completed on December 3, 2012. Corrective action CA-2012-RT-017, which was initiated on December 3, 2012, will revise maintenance and

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storage procedures to specify removal of nuts and bolts during storage and installation of nuts and bolts prior to shipment of packages containing radioactive material.

Nonconformance report 2012-004 was initiated on November 29, 2012, either to rework/repair incorrectly oriented steel angles prior to use in shipping radioactive material, or to approve as is after appropriately modifying drawings. If rework/repair is performed, it will be performed in accordance with procedure R-2031, "Repair of Shipping Package Components."

Additional inspections were performed in an effort to detect similar deficiencies. Also, an emphasis will be placed on maintenance personnel checking package components more closely against drawings.

5. Staff comments:

The nuts and bolts, which were a non-conformance during storage of the overpack lids, performed their safety function during transport. In addition, the non-conforming angle iron did not adversely impact the structural integrity of the overpack lids. Consequently, staff has determined this incident is not safety significant.

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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