

# 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.:** ML15169B102

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 a continuation of the reports submitted earlier (ML14223A796 and ML14281A026) 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. Condition No. 6 of CoC No. 9218, Rev. 21, indicates that, "...chemical properties, chemical compatibility...must be determined and limited in accordance with CH-TRAMPAC, Rev. 4."

As part of the corrective actions, a root cause analysis was completed by a Phase 2 Accident Investigation Board (AIB) by the Deputy Assistant Secretary, Safety, Security, and Quality Assurance Programs for the U.S. Department of Energy, Office of Environmental Management. The Phase 2 final report of the AIB was released on April 16, 2015. The report lists Conclusions (CONs), derived from the analytical, results performed during this accident investigation for determining what happened and why it happened, and Judgments of Need (JONs), "...based on objective analysis and application of the core analytical techniques using the facts to develop the root and contributing causes."

The Central Characterization Program (CCP) under NWP has developed a corrective action plan in response to the AIB Phase 2 Report CONs and JONs. In addition to the corrective actions mentioned in reports submitted earlier, the corrective actions listed under, "Corrective actions taken by the licensee," will also be performed.

## 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.

Corrective actions developed by CCP:

- Revision of the procedure directing the acceptable knowledge (AK) documentation preparation, review and approval (CCP-TP-005). This incorporates the addition of a new assessment for waste streams to ensure documentation relating to the management of potentially energetic TRU waste streams (reactive, ignitable, and incompatible materials) is adequate, current, and accurately described. Review elements of this assessment include waste generation, packaging, treatment, remediation, and characterization, focusing on the use of absorbents, immobilization products, and neutralization reagents for the waste stream, as well as, special testing and management activities associated with suspect materials (e.g., unknown chemical or liquids). The revised procedure will formalize AK briefings, and require the preparation of a chemical compatibility memorandum. AK summary reports will be reviewed by a broader cross-section of disciplines.
- Revision of Site Interface Documents to clearly delineate the roles and responsibilities of CCP and the Host site, which will place more stringent controls on the review and approval of AK source documents that relate to characterization of the waste. The revised Site Interface Documents will include a more comprehensive list of documents that must be maintained in CCP's System of Controls and a more formalized approach to communication, coordination, review, and approvals that will control potential impacts of the generation of secondary waste items within a waste stream.
- Training personnel to revised plan, procedure, and processes to implement changes to the TRU waste characterization program.

## 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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