

United States Government

Department of Energy

Carlsbad Field Office
Carlsbad, New Mexico 88221

memorandum

DATE: January 14, 2002

REPLY TO
ATTN OF: CBFO:NTP:RMK:VW:02-0212:UFC:2300

SUBJECT: CAR No. 02-034; Container Integrity

TO: Mark Frei, DOE-ID

INEEL Shipment Number IN010177, TRUPACT-II S/N 158 arrived at WIPP on January 10, 2002. WIPP operators noticed considerable rusting, black discoloration, indicating accelerated corrosion, and heavy flaking around the bottom rim of Drum Number IDRF741202896. Rust flakes were also on the slip sheet. When pressure was applied to the area of concern, the drum wall was able to be depressed. Wall thickness measurement using Krautkramer Branson CL3 Ultrasonic Thickness Gauge indicated a nominal (unrusted at wall near top of drum) wall thickness: ~0.054 inches and a rusted wall thickness: ~0.010 inches. This drum was considered to be unacceptable for receipt at WIPP, based on the requirements in Section 3.2.1 of the WIPP WAC (DOE/WIPP-069, Revision 7, Change Notice 2) and the CBFO October 22 Memorandum *Clarification of CH-WAC Container Integrity Criteria*. As such, the drum was overpacked in accordance with the WIPP HWFP and WIPP procedures. Please find Corrective Action Report 02-034 attached.

When containers that are not of good integrity are shipped to WIPP, they must be overpacked. This results in the loss of operation of one TRUDOCK for at least half of one shift (~4.5 hrs) during the overpacking activities. This means that WIPP cannot unload 2 TRUPACTS during that down time. Additional resources are required to update WWIS, make procedure modifications, labels, USQ/RCRA screens, etc. There is also the potential loss of Inner Container Vessel if the container breaches and contaminates the TRUPACT-II.

As a result, the site that shipped the container will be issued a CAR. Additionally, since WIPP is expecting to be receiving and downloading waste at maximum capacity in the near future, if a site causes a delay in unloading/downloading activities, their shipments will be delayed. Furthermore, if a site causes shipments from other sites to be delayed, their shipments will be reduced until the other site is back on schedule.

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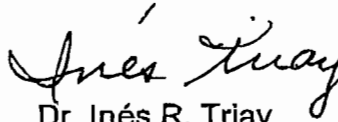


Mark Frei

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January 14, 2002

If you have any questions regarding this matter, please contact Mr. Kerry Watson at (505) 234-7357 or Mr. Reinhard Knerr at (505) 234-7374.


Dr. Inés R. Triay
Manager

Attachment

cc: w/attachment
K. Watson, CBFO
R. Knerr, CBFO
C. Zvonar, CBFO
J. Plum, CBFO
C. Gadbury, CBFO
J. Wells, DOE-ID
R. Taft, DOE-ID
T. Monk, INEEL

CORRECTIVE ACTION REPORT

1. CAR No.: 02-034 2. Activity Report No.: Shipment IN010177 3. Page 1 of 24. Controlling Document: DOE/WIPP-069, Revision 7
Continued - See Attached Continuation Sheet

5. CBFO Assessment Team Leader: N/A

6. Responsible Organization: INEEL

7. CAQ Was Discussed With: T. Monk and R. Taft

8. Requirement that was violated:

- a. DOE/WIPP-069, Revision 7, Waste Acceptance Criteria, Section 3.2.1, second paragraph, second sentence states: "All containers transported within the TRUPACT-II shall comply with the specifications in the TRUPACT-II SARP."

Continued - See Attached Continuation Sheet

9. Condition Adverse to Quality:

INEEL Shipment Number IN010177, TRUPACT-II S/N 158, received at WIPP on January 10, 2002, contained INEEL Drum Number IDRF741202896. Drum Number IDRF741202896 contained considerable rusting around bottom rim and approximately one-inch high above the bottom rim. Black discoloration, indicating accelerated corrosion, was also noted immediately above the bottom rim of the drum. Flaking (metal and paint) was noted on the slip sheet. In addition, a dent approximately two-inches long and a 1/2 -inch wide was noted on the drum immediately above the black discoloration

10. Suggested Actions (Optional):

11a. Significant CAQ (Yes or No): Yes

11b. Work Suspension Recommended (Yes or No): No

11c. CCA-Related (Yes or No): Yes

11d. RCRA-Related (Yes or No): Yes

12. Types of Actions: Remedial: Investigative: X Root Cause: X Actions to Preclude Recurrence: X13. CAR Initiator: R. Knerr Date: 01/11/0214. Response Due Date: January 31, 2002 Corrective Action Plan Required: YES15. Concurrence: N/A

Assessment Team Leader

Date

Responsible Assistant Manager

Date

Mottalain
Quality Assurance Manager

01/14/02
Date

[Signature]
Responsible Assistant Manager

01/14/2002
Date

16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet

17. Acceptance of Proposed Corrective Actions:

Assessment Team Leader

Date

18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)

19a. Verified By: _____

19b. Trend Cause Code: _____

20. Closure: _____

Quality Assurance Manager

Date

CBI CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:

2. Activity No.: Shipment IN010177

3. Page 2 of 2Block # 8

- b. DOE/WIPP-069, Revision 7, Waste Acceptance Criteria, Section 3.2.1, third paragraph, third sentence states in part:

"Waste containers will be made of steel and be in good condition prior to shipment from the generator sites..."

- c. TRUPACT-II SAR, Revision 18, Section 2.1.2, second paragraph states:

"In addition to meeting the specifications of Appendix 1.3.3 of the SAR at the time of procurement, the integrity of the payload containers shall be inspected prior to shipment."

- d. DOE Memorandum, CBFO:NTP:RMK:VW:01-1758:UFC:5822, Clarification of CH-WAC Container Integrity Criteria, dated October 22, 2001, first paragraph, last sentence states:

"Effective immediately, sites shall not ship payload containers to WIPP that do not meet the following:

Payload containers must be made of steel and be in good and unimpaired condition prior to shipment from the generator/storage sites. A payload container in good and unimpaired condition 1) does not have significant rusting, 2) is of sound structural integrity, and 3) does not leak. Significant rusting is a readily observable loss of metal due to oxidation (e.g., flaking, bubbling, or pitting) that causes degradation of the payload container's structural integrity."

- e. INEEL Technical Procedure TPR-1625, WMF-635 Dispositioning and Container Integrity, Appendix C, Container integrity examination criteria, which includes the following criteria:

"1. Is the container obviously degraded?"

"8. Is there any potentially significant rust or corrosion such that wall thinning, pinholes, or breaches are likely or the load-bearing capacity is suspect? Potentially significant rust or corrosion is characterized by pitting, pocking, flaking, or dark coloration on any outside surface."