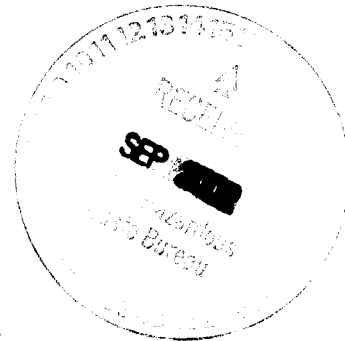




**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
September 13, 2002



Mr. Steve Zappe, WIPP Project Leader  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

Subject: Communication of WIPP Actions Related to INEEL Shipment #IN020271

Dear Mr. Zappe:

The purpose of this letter is to communicate actions performed at the Waste Isolation Pilot Plant (WIPP) subsequent to the arrival of Idaho National Engineering and Environmental Laboratory (INEEL) Shipment #IN020271 (Reference Manifest Number ID489000895252271). The CAST Transportation Inc., vehicle that was transporting the INEEL shipment was involved in a traffic accident while in route to the WIPP on August 25, 2002. The shipment consisted of TRUPACT #151 and #157. The TRUPACTs were not compromised or damaged in the accident. There was no release of hazardous materials. The Department of Energy (DOE) Carlsbad Field Office (CBFO), Westinghouse TRU Solutions (WTS), and State of New Mexico Motor Transportation Division (MTD) personnel inspected the truck, trailer, and TRUPACTs at the scene. No problems were identified during the inspection and the shipment was escorted to the WIPP by the MTD.

After arrival at the WIPP TRUPACT-II #151 was unloaded and its Outer Container Assembly (OCA) was surveyed clean. The OCA lid of the TRUPACT-II was removed and the inside of the Outer Container Vessel (OCV) lid and the outside of the Inner Container Vessel (ICV) lid was surveyed clean. A sample from the ICV was taken and no airborne radioactivity was detected inside the ICV. The ICV lid was removed and the inside of the ICV lid and payload containers were surveyed clean. The shipment receipt procedures were completed and the waste was placed underground.

Unloading operations began on the TRUPACT-II #157, with the OCA surveying clean. The OCA lid was removed, and the inside of OCV lid and the outside of the ICV lid surveyed clean. However, the air sample drawn from inside the ICV (before opening) indicated airborne levels of radioactivity that precluded safe continuation of unloading the ICV. Subsequent air samples were collected from the ICV. Final confirmation of the presence of airborne transuranic isotopes was obtained at 7:00 AM, Monday, August 26. At this time the WIPP entered into an off-normal condition as required under the Hazardous Waste Facility Permit (HWFP) Section M1-1d.

Because the magnitude and extent of the surface contamination could not be determined without opening the ICV, the CBFO decided not to open the ICV and risk possible contamination of WIPP workers, structures, or equipment. Since the criteria for small area spot decontamination (i.e., less than 100 times the DOE free release limits of 20 disintegrations per minute [dpm] alpha or 200 dpm beta/gamma and less than 6 ft<sup>2</sup>) could



not be confirmed without opening the ICV, the decision to return the shipment was made based on HWFP Section M1-1d(2), which states:

*In the event a large area contamination is discovered within a TRUPACT-II during unloading, the waste will be left in the TRUPACT-II and the shipping container will be resealed. The DOE considers such contamination problems the responsibility of the shipping site. Therefore, the shipper will have several options for disposition.*

The first of three options listed in Section M1-1d(2) was selected for implementation as follows:

- *The TRUPACT-II can be returned to the shipper for decontamination and repackaging of the waste. Such waste would have to be re-approved prior to shipment to the WIPP.*

TRUPACT-II # 157 was returned to INEEL on August 28, 2002 for decontamination and repackaging of the waste (Reference Manifest Number ID489000895201901).

As a result of not opening the ICV, the container barcodes could not be compared to the WWIS data. WIPP personnel were able to determine the completeness and accuracy of the manifest; however, they were unable to make the determination of waste shipment completeness as required by HWFP Section B-4b(2). Because WIPP personnel did not assemble the payload in TRUPACT-II # 157 and could not perform actions required to demonstrate full compliance with the TRUPACT II Certificate of Compliance, it was necessary to have INEEL personnel certify the shipment and prepare the required shipping documentation, including the hazardous waste manifest.

HWFP Section B-4b(2)(i) requires that documentation of returned containers be recorded in the WWIS. Enclosed is our plan for changing data in the WWIS and documenting those changes consistent with the HWFP. Changes beyond indicating the current status of the containers in a comment field will not be made without NMED concurrence with the approach in the enclosed plan for WWIS Data Changes.

Also enclosed are the receipt and return manifests for TRUPACT-II # 157.

If you have any questions or require additional information, please contact Mr. Kerry Watson at (505) 234-7357.

Sincerely,



Dr. Inés R. Triay  
Manager

Enclosure

Mr. Steve Zappe

-3-

September 13, 2002

cc: w/enclosure  
L. Lovejoy, NMAG  
S. Monroe, EPA

## **PLAN FOR WWIS DATA CHANGES – SHIPMENT #IN020271**

### **Introductory Information:**

- The current WWIS shipment status for IN020271 is RECEIVED\_SHIP. The shipment status will remain RECEIVED\_SHIP.
- When shipments are received at WIPP and show RECEIVED\_SHIP status, e-TRAMPAC data for the shipment are not available. e-TRAMPAC data are no longer available for Shipment #IN020271. e-TRAMPAC data are not a factor for the return shipment #RTIN020271.
- TRUPACTs #151 and #157 were received on shipment IN020271. TRUPACTs #151 and #157 are shown as being received at WIPP on shipment IN020271.

### **Data Changes:**

A note was added to the comment field of Shipment #IN020271 to indicate that the TRUPACT #157 and the containers that were shown as RECEIVED\_SHIP in the WWIS but not physically unloaded at WIPP were returned to the generator.

Addition to Shipment #IN020271 – Comment Field : Payload containers in TRUPACT #157 of this shipment were not unloaded and were returned to the generator in shipment #RTIN020271 on 8/28/02 per HWFP Section M1-1d(2). The affected containers were:

IDRF004002790, IDRF004002801, IDRF004101890, IDRF004102254, IDRF004122263, IDRF741202088, IDRF741202484, IDRF074221338, IDRF074700394, IDRF074700411, IDRF741201615, IDRF741201718, IDRF741204650, and IDRF741205405

Upon concurrence by NMED, the assembly numbers IN021909 and IN021910, along with the certification data for all containers will need to be removed from the WWIS data for Shipment #IN020271. At such time that the containers are re-certified by the generator, removal of the data for the containers listed above from the WWIS will be necessary in order to facilitate shipment of the containers. The WWIS will not allow data entry or submittal of duplicate container I.D. numbers.

### **Documentation – Data Change Log:**

By design, the WWIS Data Change Log does not track additions to the tables or forms after data is submitted to the WWIS and approved. However, Westinghouse TRU Solutions (WTS) has developed and implemented a Data Change Request process that is described in WP-08NT.04, WIPP Waste

Information System Software Quality Assurance Program. The data change process meets the requirements of HWFP Section B-4(b)(2)(i) and the data changes described herein were made in accordance with the established process that includes documentation of the change on the WWIS Data Change Request Log.

A copy of WWIS Data Change Request #IN02.007 and the log are attached.

### ATTACHMENT 4 - WWIS DATA CHANGE REQUEST SHEET

Data Change Number: IN02.007

Brief Description of Data Change: Re-configure data for Shipment #IN020271

Detailed Description of Data Change (use additional sheets as necessary):

Re-configure shipment IN020271 to reflect return of containers received in TRUPACT #157 to the generator.

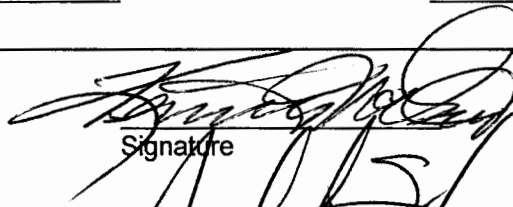
(Fill in the Blanks)

Container #: See Attachment Date of Receipt: 8/25/02 Shipment #: IN020271

Date Emplaced: N/A Emplacement Location: N/A

Shipper Site: INEEL Technical Contact: Julie Baker (208)526-7471

K. Mikus  
Requester Name



Signature

8/27/02  
Date

Approvals:  
D. Speed  
WWIS Data Administrator Name

Signature

8/21/02  
Date

S. Offner  
WWIS Cognizant Engineer Name

Signature

9/3/02  
Date

P. Damm  
WWIS Software QA Specialist Name

Signature

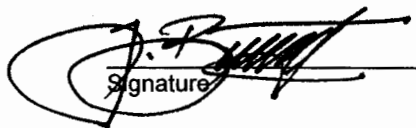
8/28/02  
Date

S. Offner  
WWIS Database Administrator  
Concurrence:

Signature

9/3/02  
Date

J. R. Bennett  
Cognizant Manager



Signature

9/3/02  
Date

Signature

Date

## WWIS DATA CHANGE REQUEST LOG

Data Change Number	Description of Data Change	Requester Name	Date of Management Approval	Date of Implementation
SR01.1	Change Shipment Data - #SR01001	M. Strum	16-May-01	16-May-01
RF01.002	Change TRUPACT-II Closure Dates	M. Strum	17-May-01	17-May-01
WI01.001	Revise emplacement locations of waste containers	M. Strum	19-Jul-01	19-Jul-01
WI01.002	Correct reversed waste emplacement locations	D. Standiford	19-Jul-01	19-Jul-01
WI01.003	Change Shipment Receipt Dates	M. Strum	01-Aug-01	01-Aug-01
RL01.001	Change analyte data on 1 waste container	M. Strum	13-Aug-01	13-Aug-01
WHO-2001.001	Correct emplacement data	K. Mikus	15-Aug-01	15-Aug-01
RL01.002	Change FGE Uncertainty value on 1 waste cntr	M. Strum	22-Aug-01	22-Aug-01
IN01.001	Replace waste container with dunnage drum	D. Standiford	05-Sep-01	05-Sep-01
IN01.002	Switch two drums numbers - Ship #IN010134	M. Strum	10-Sep-01	10-Sep-01
RL01.003	Change Waste Handling Code	M. Strum	18-Sep-01	18-Sep-01
IN01.003	Add statement to comment field (Overpack cntr)	D. Speed	20-Sep-01	20-Sep-01
WI01.004	Correct DOT Descriptions (Several Shipments)	K. Mikus	09-Oct-01	09-Oct-01
IN02.001	Replace waste container with dunnage drum	M. Strum	12-Jan-02	12-Jan-02
RF02.001	Revise WSPF # on one waste container	M. Strum	17-Jan-02	17-Jan-02
RF02.002	Revise Headspace Gas Values (4,412 containers)	M. Strum	17-Jan-02	17-Jan-02

## WWIS DATA CHANGE REQUEST LOG

Data Change Number	Description of Data Change	Requester Name	Date of Management Approval	Date of Implementation
RF02.003	Change send date for 2 RFETS shipments	M. Strum	28-Jan-02	28-Jan-02
IN02.002	Change Certification dates for 2 INEEL shipments	M. Strum	28-Jan-02	28-Jan-02
RF02.004	Change send date for 1 RFETS shipment	M. Strum	04-Mar-02	08-Mar-02
WI02.001	Change Container Type Codes	M. Strum	14-Mar-02	01-Apr-02
WI02.002	Change emplacement date for one waste cntr	M. Strum	02-Apr-02	02-Apr-02
RF02.005	Change assay uncertainty values for 28 drums	M. Strum	21-May-02	21-May-02
RF02.006	Remove checkmark from HRCQ checkbox	M. Strum	04-Jun-02	04-Jun-02
IN02.003	Change send date for shipment IN020134	D. Standiford	20-Jun-02	20-Jun-02
RF02.007	Change DOT Description for TRUPACT #177	M. Strum	26-Jun-02	26-Jun-02
RF02.008	Revise tractor numbers to actual tractors used	D. Standiford	12-Jul-02	12-Jul-02
IN02.004	Recalculate and replace FGE uncertainty values	M. Strum	22-Jul-02	22-Jul-02
IN02.005	Add Analyte Data to 8 Containers	K. Mikus	20-Aug-02	20-Aug-02
RL02.001	Add Analyte Data to 5 RL, 1 SR, and 1 RF Containers	K Mikus		
IN02.006	Add radionuclide data to 2 SWBs	M. Strum	27-Aug-02	27-Aug-02
IN02.007	Re-configure data for Shipment #IN020271 - Return TRUPACT #157 to generator (contaminated ICV) HWFP Section M1-1d(2)	M. Strum	03-Sep-02	12-Sep-02



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. I   D   4   8   9   0   0   0   8   9   5   2   5   2   2   7   1	Manifest Document No. 1   1   1	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LAB. FOR U.S. DOE P.O. BOX 1625 IDAHO FALLS, ID 83415			A. State Manifest Document Number		
4. Generator's Phone ( 208 ) 526-2487			B. State Generator's ID ID4890008952		
5. Transporter 1 Company Name CAST TRANSPORTATION INC		6. US EPA ID Number C   O   R   0   0   0   0   0   5   3   8   9		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 1-888-699-6262	
9. Designated Facility Name and Site Address WESTINGHOUSE TRU SOLUTIONS, LLC for U.S. DOE - 30 MI EAST OF CARLSBAD ON THE JAL HIGHWAY EDDY COUNTY, N.M. 88221		10. US EPA ID Number N   M   4   8   9   0   1   3   9   0   8   8		E. State Transporter's ID	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity	
14. Unit Wt/Vol		15. Waste No.			
a. RQ WASTE RADIOACTIVE MATERIAL, FISSILE, N.O.S., 7, UN2918 Am241, Pu239, Pu240 SOLID, METAL OXIDE 3.22 TBq		0   0   1 C   M		1   8   2   1   7 P	
X LABEL: RADIOACTIVE YELLOW III TI = 0.5 HIGHWAY ROUTE CONTROLLED QUANTITY USA/9218/B(U)F-85 TYPE B TRUPACT # 151				D004, D005, D006, D007, D008, D009, D010, D011, D022	
b. RQ WASTE RADIOACTIVE MATERIAL, FISSILE, N.O.S., 7, UN2918 Pu239, Am241, Pu240 SOLID, METAL OXIDE 2.83 TBq		0   0   1 C   M		1   8   7   1   0 P	
X LABEL: RADIOACTIVE YELLOW III TI = 0.5 HIGHWAY ROUTE CONTROLLED QUANTITY USA/9218/B(U)F-85 TYPE B TRUPACT # 157				D004, D005, D006, D007, D008, D009, D010, D011, D022	
J. Additional Descriptions for Materials Listed Above DRUMS CONTAIN SLUDGE, AND FILTER MEDIA ERG # 165			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information RETURN SIGNED ORIGINAL WITHIN 30 DAYS TO: 24HR EMERGENCY CONTACT: 208-526-1515 R. T. KENDRICK INEEL - PO BOX 1625 IDAHO FALLS, ID 83415-4201 REF. SHIPMENT # IN020271 TRAC - C3 TRLR - 20 PREPARED UNDER CONTRACT # DE-AC07-99ID-13727					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Roger L. Smith		Signature <i>Roger L. Smith</i>		Month Day Year 10   8   23   02	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name Rita Hanway		Signature <i>Rita Hanway</i>		Month Day Year 10   8   23   02	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space Item B package 157 return for Radiological evaluation see manifest ID 4890008952 01901 RC 8-28-02					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name P. J. PANEAL		Signature <i>Paul J. Paneal</i>		Month Day Year 10   8   25   02	

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. I   D   4   8   9   0   0   0   8   9   5   2   0   1   9   0   1		Manifest Document No. 0   1   9   0   1	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.						
3. Generator's Name and Mailing Address  IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LAB. (from WIPP, Carlsbad, N.M.)  FOR U.S. DOE P.O. BOX 1625 IDAHO FALLS, ID 83415					A. State Manifest Document Number							
					B. State Generator's ID ID4890008952							
4. Generator's Phone ( 208 ) 526-2487					C. State Transporter's ID							
5. Transporter 1 Company Name CAST TRANSPORTATION INC		6. US EPA ID Number C   O   R   0   0   0   0   0   5   3   8   9		D. Transporter's Phone 1-888-699-6262								
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID								
				F. Transporter's Phone								
9. Designated Facility Name and Site Address IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LAB. FOR U.S. DOE. P.O. BOX 1625 IDAHO FALLS, ID 83415					G. State Facility's ID							
					H. Facility's Phone ( 208 ) 526-2487							
10. US EPA ID Number I   D   4   8   9   0   0   0   8   9   5   2												
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers		13. Total Quantity		14. Unit		15. Waste No.	
a. <input checked="" type="checkbox"/> HM RQ WASTE RADIOACTIVE MATERIAL, FISSILE, N.O.S., 7, UN2918 Pu239, Am241, Pu240 SOLID, METAL OXIDE 2.83 TBq					0   0   1   C   M		1   8   7   1   0		P		F001, F002, F005, F006, F007, F009, D032	
X LABEL: RADIOACTIVE YELLOW III TI = 0.1 HIGHWAY ROUTE CONTROLLED QUANTITY USA/9218/B(U)F-85 TYPE B TRUPACT # 157											D004, D005, D006, D007, D008, D009, D010, D011, D022	
c.												
d.												
J. Additional Descriptions for Materials Listed Above DRUMS CONTAIN SLUDGE, AND FILTER MEDIA  ERG # 165					K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information  RETURN SIGNED ORIGINAL WITHIN 30 DAYS TO: R. T. KENDRICK INEEL - PO BOX 1625 IDAHO FALLS, ID 83415-4201 PREPARED UNDER CONTRACT # DE-AC07-99ID-13727  24HR EMERGENCY CONTACT: 208-526-1515 SHIPMENT # RTIN020271 (Return) REF. SHIPMENT # IN020271 (Original) TRAC - C 10 TRLR - 306												
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.												
Printed/Typed Name BRUCE ELLIS					Signature <i>Bruce Ellis</i>			Month Day Year 10 8 28 10 12				
17. Transporter 1 Acknowledgement of Receipt of Materials												
Printed/Typed Name MASON ERNEST					Signature <i>Mason Ernest</i>			Month Day Year 10 8 28 10 12				
18. Transporter 2 Acknowledgement of Receipt of Materials												
Printed/Typed Name					Signature			Month Day Year				
19. Discrepancy Indication Space												
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.												
Printed/Typed Name					Signature			Month Day Year				