



Department of Energy
Washington, DC 20585

June 8, 2020

MEMORANDUM FOR GREGORY SOSSON
ACTING MANAGER
CARLSBAD FIELD OFFICE

FROM: JULIA C. SHENK Digitally signed by Julia C. Shenk
Date: 2020.06.08 08:30:29 -04'00'
HEADQUARTERS CERTIFYING OFFICIAL
DIRECTOR
OFFICE OF PACKAGING AND TRANSPORTATION

SUBJECT: Renewal of Nuclear Waste Partnership Quality Assurance
Program Plan

Attached is Department of Energy (DOE) Quality Assurance Program (QAP) Approval Number 0015, Revision 1, for Nuclear Waste Partnership LLC, (NWP), in response to the request from Kenneth E. Princen, dated April 4, 2019, as supplemented. This approval and renewal is based on independent review by the DOE Packaging Certification Program (PCP) staff of *NWP 10 CFR Part 71, Subpart H, Quality Assurance Program Plan (QAPP)*, WP 08-PT.03, Revision 12, dated April 19, 2016 (effective date).

There were no compliance findings or observations related to the PCP review of the NWP QAPP against 10 CFR 71 Subpart H requirements. However, the QAPP is not internally consistent in that it states it follows U.S. Nuclear Regulatory Commission Regulatory Guide 7.10, *Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material*, but, as noted on the attached Form C, there were 11 observations where the QAPP was not consistent with RG 7.10. These observations need to be addressed in the next revision of the QAPP.

This DOE QAP Approval satisfies DOE Order 460.1D, *Hazardous Materials Packaging and Transportation Safety*, and therefore complies with the provisions in 49 CFR 173.7(d) for the DOE to maintain packaging standards equivalent to those specified in 10 CFR Part 71.

The expiration date of DOE Approval Number 0015, Revision 1, is January 31, 2025. If you wish to renew, revise, or terminate QAP Approval No. 0015, please request this action in writing. Any revisions to NWP QAPP, WP 08-PT.03, Revision 12, except for spelling corrections and nonsubstantive changes to punctuation or editorial items, must be submitted and approved by the DOE PCP prior to implementation of the proposed changes.

This approval memorandum also serves as a reminder that the Order requires that for offsite transportation each Departmental element that uses a Type B or fissile package certified by DOE must register with the DOE Certifying Official prior to first use of the package. Refer to the following URL for registration instructions:

<https://rampac.energy.gov/home/package-certification-information/guidance/doe-guidance>.

If you have any questions, please contact me or Dr. James Shuler of my staff at (301) 903-5513.

Attachment: Form C

cc: Kenneth E. Princen, CBFO
Daniel L. Standiford, CBFO
James Shuler, EM-4.24



U.S. Department of Energy
QUALITY ASSURANCE PROGRAM APPROVAL
 For Type B and Fissile Radioactive Material Packages

1. APPROVAL NUMBER 0015
REVISION 1

Pursuant to DOE Order 460.1D, *Hazardous Materials Packaging and Transportation Safety*, subparagraph 4.a.(3), *Quality Assurance (QA)* directs that each Departmental element that participates in the use, design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, and modification of Type B or fissile materials packaging must have and maintain a quality assurance (QA) program in accordance with 10 CFR Part 71, Subpart H that is approved by the NRC or the DOE Certifying Official, prior to the performance of those operations. The Contractors Requirements Document in Attachment 1 of Paragraph 5.a. of the Order imposes the same requirement on DOE contractors. Based on the reliance on statements and representations heretofore made in Block 5 by the organization named in Block 2, the Quality Assurance Program Description identified in Block 5 is hereby approved. This approval is issued to satisfy the requirements of the Order, 49 CFR 173.7.(d), and 10 CFR 71.101. This approval is subject to all applicable rules, regulations, and orders of the U.S. Department of Energy now or hereafter in effect and to any conditions specified below .

2. ORGANIZATION NAME Nuclear Waste Partnership, LLC			3. EXPIRATION DATE January 31, 2025
STREET ADDRESS P.O. Box 2078			4. DOCKET NUMBER 2013-001
CITY Carlsbad	STATE NM	ZIP CODE 88221-2078	

5. QUALITY ASSURANCE PROGRAM DESCRIPTION, REVISION, and DATE
NWP 10 CFR Part 71, Subpart H, Quality Assurance Program Plan, WP 08-PT.03, Revision 12, April 19, 2016.

6. CONDITIONS

- Activities conducted regarding Type B and fissile material transportation packagings are to be executed under applicable criteria of 10 CFR Part 71 Subpart H. Authorized activities include: design, procurement, fabrication, assembly, testing, modification, maintenance, repair and use of transportation packagings.
- Records shall be maintained in accordance with the provisions of 10 CFR Part 71. Specifically:
 - Records of each shipment of licensed material shall be maintained for 3 years after that shipment [10 CFR 71.91(a)].
 - Records providing evidence of packaging quality shall be maintained for 3 years after the life of the packaging [10 CFR 71.91(d)].
 - Records describing activities affecting packaging quality shall be maintained for 3 years after this Quality Assurance Program Approval is terminated [10 CFR 71.135].
- Planned and periodic audits of all aspects of the Quality Assurance Program shall be conducted in accordance with written procedures or checklists, by appropriately trained personnel not having direct responsibility in the areas being audited, in accordance with 10 CFR 71.137.
- In addition to the requirements of Subparts G and H of 10 CFR 71, and except as specified in Section 5(d), "Conditions," of applicable Certificates of Compliance, each package must be designed, fabricated, acceptance tested, operated, and maintained in accordance with applicable Safety Analysis Report for Packaging requirements; specifically, Chapter 7, "Operating Procedures," Chapter 8, "Acceptance Tests and Maintenance Program," and Chapter 9, "Quality Assurance."

FOR THE U.S. DEPARTMENT OF ENERGY

SIGNATURE Julia C. Shenk Digitally signed by Julia C. Shenk Date: 2020.06.08 08:35:09 -04'00'	DATE OF ISSUANCE June 8, 2020
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Julia C. Shenk
 Headquarters Certifying Official
 Director, Office of Packaging and Transportation