

## WM2014 Conference Panel Report

### PANEL SESSION 56: Packaging Manufacturing Challenges and Lessons Learned

**Co-Chairs:** Steven O'Connor, *Director, Office of Packaging and Transportation, DOE*  
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#### Panelists

1. **Michael Snyder**, *Project Manager of Field Services, MHF Services*
2. **Mike Lewis**, *QA Manager, Container Products Corporation*
3. **Bill Smart**, *Nuclear Sales Director, PacTec*
4. **Steve Fielden**, *President, Container Technologies Industries, Inc.*
5. **Rob Despain**, *V.P. Business Development, Petersen, Inc.*
6. **Howard Skolnik**, *President, Skolnik Industries, Inc.*
7. **Dean Ricker**, *Vice-President of Sales, Skolnik Industries, Inc.*

This session that focused on packaging manufacturing challenges and lessons learned. This panel consisted of transportation packaging manufacturers who provide products to Department of Energy (DOE), Department of Defense (DOD) and the commercial nuclear industry. The purpose of the panel discussion was to identify opportunities for improvement and challenges faced by our packaging manufacturers in providing high quality radioactive material packaging consistently and to reduce unnecessary costs to the users. The panel discussion focused on manufacturing of commonly used packaging for transport of low activity radioactive wastes and materials (such as IP-1, IP-2 and IP-3, and Type A).

**Michael Lewis** kicked off the session with an overview of his company. He discussed how they perform package performance testing for outside companies as well as their own. The B25 is their bread and butter. They provide reusable containers, decon units and Type A liquid sample containers.

The challenges in dealing with DOE/DOD contractors are budget fluctuations and blending DOE, DOD and commercial requirements. Information was provided on contract and specification requirements for DOE sites that are required; win or lose. With commercial contracts, they have close engineering involvement with the end user. This is not the case with DOE/DOD as they work with contracts personnel. There is not a consistent design for waste boxes, the different DOE offices want little things changed. Domestic materials which DOE is requiring are scarce and expensive.

QA requirements and supplier evaluations differ greatly between DOE and commercial contracts. Commercial has 1 "super" evaluation, and DOE can have as many as six audits in 1 year.

DOE procurement process issues are that they are required to bid on containers on a short time frame, i.e., 3-4 days. They want better and cheaper but want containers specialized not just meeting the regulations.

**Steve Fielden** stated that they had 300-400 designs in their library with different requirements.

Their supplier issues are that they would like auditors recruited and trained to apply consistent requirements for NQA1 supplier quality programs. They would also like easier access to the responsible technical person. Some auditors will demand that parts of a supplier QA program be changed. They will

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be working on containers and then everything will stop in order to answer questions. There are liability issues on contractor versus DOE.

**Michael Snyder** presented information on his company. They have recently acquired Bull Run, so they have many container choices to offer.

They would like to see the DOE sites use direct requirements from 49CFR part 173 for container requirements. There are funding delays when dealing with DOE. A lot of times the procurement of a container is a sub-sub-sub and they won't have all the information needed for the full specifications.

They would like to see DOE operate more along the lines of utilities. They use a graded approach and will self-certify IP-1 containers. Utilities look at sharing training, etc.

They would also like to see audits taking the Nuclear Procurement Issues Committee (NUPIC) audit approach. Regulatory requirements are being interpreted by DOE contractors instead of relying on the regulatory knowledge of the manufacturer. They are implementing different requirements that are in the gray area.

**Bill Smart** started off his presentation with discussing the packaging they were supplying to Subic Bay, Fukushima, and Sellafield. They are developing prototypes for containers. They have a very diversified portfolio from gross dewatering to perm packs and transportation liners.

Contractors attempt to tell them how to do their job and he made the comment "Does an airline tell Boeing how to build a plane or do they just give them specs?"

One of the issues with the DOE CAP, some sites do not accept it and want to perform their own audits.

**Rob Despain** discussed how DOE contractor audits are happening very frequently. They are time consuming and expensive for the companies.

E-Auctions were discussed in depth. They are based simply on cost not the total value. RFQs are better in his opinion. It is tough to run this way. They start and stop, bring up specs that were not in the original auction.

The containers need to be standardized for efficient production.

**Howard Skolnik and Dean Ricker** discussed meeting all the 7A requirements. There are unique program costs to meet the NQA Quality requirements. Businesses can use a reseller which is a work around and very inconsistent. It is all about the paper.

Discussed their inventory which includes 15 different 5/8 X 4" bolts because of things like holes in different spots for tamper indicator seals.

Issues they have are changing requirements like they want the containers to look different. Audits are costly. UN test certs, weld certs, scope creep, inconsistency, and sub tier manufacturing are additional issues.

Suggest improvements are universal audit acceptance, common specs for drums. Also need to consider cost impact on the request. DOE not following its own guidelines are also an issue.

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They also agreed with doing away with e-audits.