

Investigation Summary Report

Packaging Specialties Inc. Suspect Documentation

Executive Summary

The NNSA Pantex Plant has completed an investigation of the manufacturer and certification of 9 gallon removable head steel drums certified for solids (UN 1A2/X70/S), liquids (UN 1A2/Y1.2/100) and with a Specification 7A, Type A packaging for solid materials certifications by Packaging Specialties Inc. (PSI).

Pantex conducted a site visit of the PSI facility on May 21, 2014, in response to the receipt of multiple discrepant certification reports and closure instructions received between April 14 and May 12, 2014 issued by PSI for a single lot of 1A2, DOT 7A Type A, 9 gallon drums. The original documentation was received on June 15, 2007. This site visit focused on a review of the vendor's quality assurance documentation processes applicable to PSI's DOT certification and reporting processes and included a cursory review of the actual manufacturing and testing processes. The physical manufacturing and testing processes were found to be acceptable; however, multiple defects were identified with the vendor's quality assurance documentation system. PSI has been removed from the Pantex Plant's Qualified Supplier List (QSL) due to the discovery of the following defects:

- DOT certification reports re-issued by PSI contained Quality Technician signature, per Quality Assurance Manager had been duplicated by him
- Certification reports issued to Pantex were inconsistent with PSI's recorded UN test results
- PSI's recorded UN test results for the container lot in question were dated approximately two weeks after the container lot was shipped to the Pantex Plant

The Pantex Plant has suspended the use of all containers manufactured by PSI for offsite shipment of materials regulated by 49 CFR Parts 100-185, except for those materials which are exempted from the specification packaging requirements. The suspension will continue until these issues can be investigated further and satisfactorily resolved.

Investigative Site Visit

Pantex SQ personnel reviewed the documentation provided by the Process Engineers and attempted to contact the Quality Assurance Technician listed as the certifying technician on the reports in question and was informed by PSI personnel that the Technician that signed the report released in April of 2014 had not worked for PSI since 2008. The Pantex Plant then requested a site visit with the PSI Quality Assurance Manager. On May 21, 2014, a Pantex Quality Assurance Specialist and a Packaging and Process Engineer visited the PSI facility. A tour of the facilities production processes and testing facility were conducted and no issues were identified during this high level tour. Review and evaluation of the reports issued by PSI in the preceding month yielded multiple negative discoveries. The contents of the

certification reports were found to be inconsistent (though bounding) with the raw data forms for the certification tests. The QA Manager stated it was common practice to conduct certification testing with bounding parameters that exceed the UN required test parameters and then publish reports with the parameters that match UN requirements. The UN test reports associated with the container lot in question were found to be dated approximately two weeks after the date the container lot was shipped to Pantex. Finally when asked about the QA Technician that no longer worked for PSI, the QA manager stated that he had “duplicated” the QA Technician’s signature on the modified certification reports provided to Pantex. A detailed account of the site visit is documented in Appendix A.

Conclusion

Upon review of the PSI site visit findings the Pantex Plant Management Team decided to remove PSI from the Pantex QSL. Current purchase orders with PSI have been put on hold. A standing order has been issued to stop work so PSI containers will not be used for offsite shipment of materials regulated by 49 CFR Parts 100-185, except for those materials which are exempted from the specification packaging requirements. Notification has been made to impacted NNSA sites and Pantex is actively pursuing the identification of alternate packaging methods for offsite shipments of hazardous materials.