



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

April 27, 2000

APR 28 2000
RECEIVED

Mr. John Kieling, Hazardous Waste Permits Program Manager
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2044 A Galestio Street
Santa Fe, NM 87505

Subject: Transmittal of the Carlsbad Area Office Monthly Non-Conformance Summary

Dear Mr. Kieling

Enclosed is the Carlsbad Area Office (CAO) Monthly Nonconformance Report Summary for the period of April 01, 2000 through April 30, 2000. The Summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, Section titled, *Nonconformance to DQOs*.

Please contact Samuel A. Vega of my staff at (505) 234-7423 if you have any questions or concerns.

Sincerely,

for Gary Smith
Dr. Inés R. Triay
Manager

Enclosure

cc w/enclosure:

L. Chism, CAO
S. Vega, CAO
C. Zvonar, CAO
J. Plum, CAO
W. Most, WID
B. Kehrman, WID

cc w/o enclosure:

L. Stevens, WID



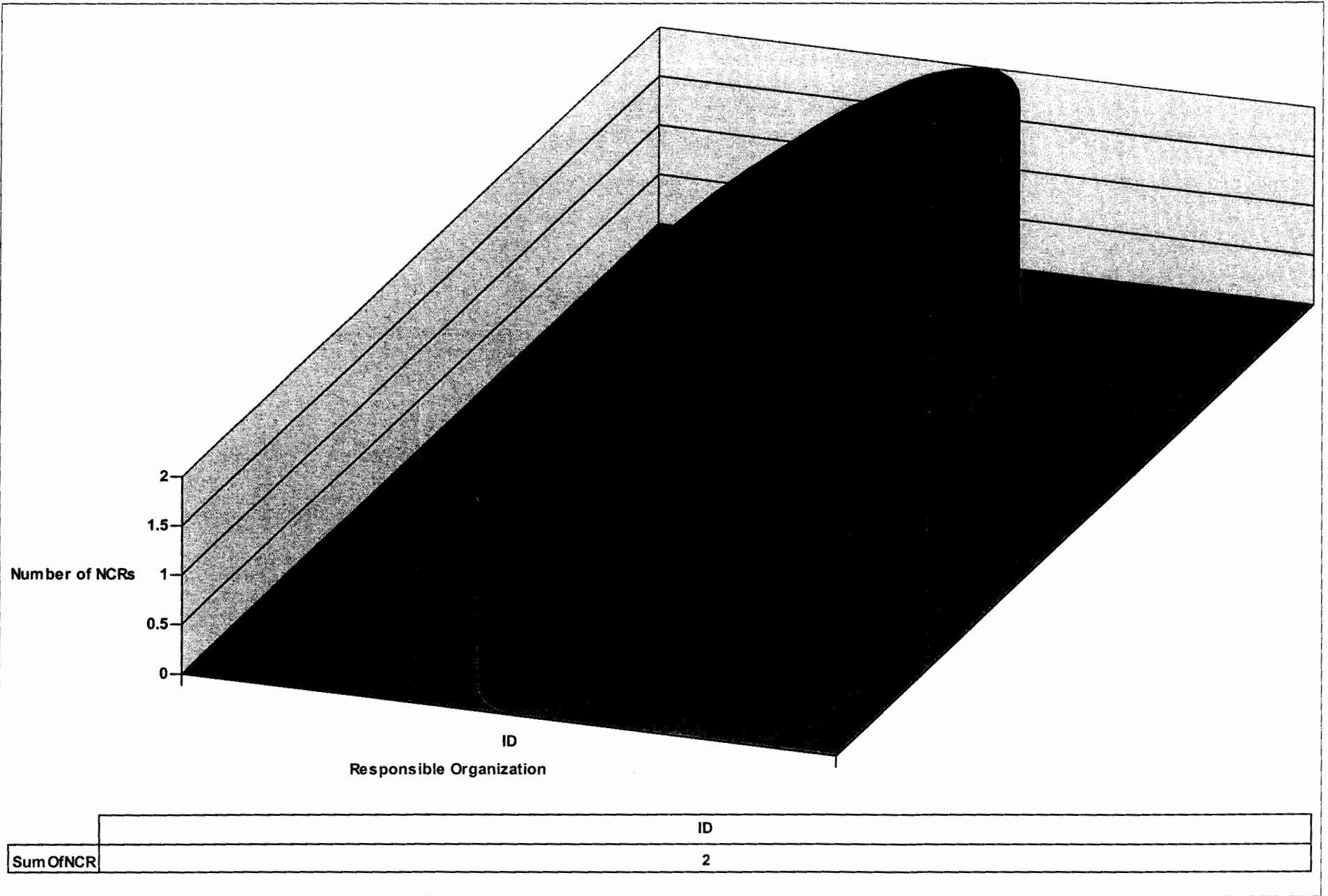
MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
APRIL 01 – APRIL 30, 2000

This summary is submitted in compliance with the requirements of the WIPP Hazardous Waste Permit, Attachment B3, Section titled, Nonconformance to DQOs.

During the period of April 01, through April 30, 2000, there were two nonconformance reports identified by one TRU waste generator site. Note that the NCR for March 28, 2000 was received along with the NCR for April 6, 2000 and so is included in this report period.

As a result of the receipt of NCRs, this summary contains a graph indicating the number of NCRs generated for each site. Because only one site generated reports, the graph indicates no comparison relationship between sites.

Number of NCRs Issued by Responsible Organization



Date of this Report:

04/26/2000

Start Date = 03/27/2000

End Date = 04/30/2000

List of ALL NCR Between the following Dates

Note: This report contains only data between the target dates shown.

Latest Start Date = 03/27/2000
Earliest End Date = 04/30/2000

NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed TCC:	Deficiency
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5 ID 03/28/2000 04/10/2000

The RPD calculated for 1,1,1-Trichloroethane, in batch ECL00005, was greater than the accepted criteria (greater than or equal to 25%) identified in the WAP.

Requirement Violated:

"Field duplicate results shall be acceptable if the relative percent difference is less than or equal to 25% for each tested compound found in concentrations greater than the PRQL in both duplicates." WAP, Section B1-1b(4), Page 9.

Actions:

The method for collection of the field duplicate that resulted in exceeding the field duplicate RPD was based upon sequential Direct Summa Sampling. CAO has approved, through a permit modification of the WIPP Part B Permit [Clarification Number CAO-00-037, Rev. 0, Headspace Gas QA/QC Requirements (Sections B1-1a(1); B1-1b(3); B1-1c(3); B3-2) and Clarification Number CAO-00-053, Rev. 0, Collection of Field Blanks (Sections B1-1a(1))], simultaneous Direct Summa Sampling utilizing a tee connection for the collection of field duplicates. In addition, Rocky Flats National Lab and Los Alamos National Lab have been utilizing simultaneous field duplicate collection with limited problems relative to RPD. As a result, the field duplicate drum should be sampled again utilizing the tee connection method of simultaneous Direct Summa Sampling. It is important to note that the needle assembly configuration will not change between the drums already collected using Direct Summa Sampling and the duplicate using the tee connection. If the results are acceptable after resampling the data associated with this batch can be used.

NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed TCC:	Deficiency
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6 ID 04/06/2000 04/10/2000

Report ECL00005M and ECL00006M
 J -- Flags have been incorrectly assigned. The analytes have been J-- flagged based on a PRQL calculated in ng using a 10 ml sample (per previous QAPP requirement). A volume for the PRQL is no longer specified in WAP Table B3-2.

Requirement Violated:

See WAP Table B3-2; also see "Reporting flags J -- Analyte less than PRQL but greater than or equal to MDL (Organic/ Headspace gases)" Section B3-10, Data Generation Level.

Actions:

The associated data will be flagged appropriately and re-transmitted to the SPO.