



**Department of Energy**

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

August 24, 2000



Mr. Steve Zappe, Hazardous Waste Permits Program Manager  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galestio Street  
Santa Fe, NM 87505

Subject: Carlsbad Area Office Monthly Nonconformance Report

Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Area Office (CAO) Monthly Nonconformance Report Summary for the period of July 23 through August 23, 2000. The summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, section titled, *Nonconformance to DQOs*.

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

Dr. Inés R. Triay  
Manager

Enclosure

cc: w/o enclosure  
J. Kieling  
J. Bearzi

CAO:QA:LC: 00-0863 UFC 1000



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**MONTHLY SUMMARIZATION REPORT**  
**FOR**  
**SITE-GENERATED NONCONFORMANCE REPORTS**  
**July 23 – August 23, 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 July 23, 2000 through August 23, 2000 there were two nonconformance reports generated. Both reports were identified by Idaho National Engineering and Environmental Laboratory (INEEL), a TRU waste generator site.

## List of ALL NCR Between the following Dates

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

Latest Start Date = 07/23/2000

Earliest End Date = 08/23/2000

Assigned NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed	Deficiency
Site NCR Number				Trend Cause Code:	
13	ID	08/07/2000	08/09/2000		1 lb of bulk lead was identified in an IDC 300 drum. See RTR000036, Drum IDRF001211089. This will require the addition of a HWN to this container for lead.
13744		S. Hailey			<p><b>Requirement Violated:</b></p> <p>MCP-2988; Step 4.4.3 requires that the AKE initiate an NCR if a waste matrix code or HWN change is required for a specific subset of drums within a waste stream.</p> <p><b>Actions:</b></p>
14	ID	08/08/2000	08/09/2000		Drum IDRF001212349 (IDC 300) has a headspace gas concentration of 2000 ppm 1,1,1-Trichloroethane. This is more than an order of magnitude higher than has been seen for this waste stream. An evaluation needs to be conducted to determine if a hazardous waste code should be added to this drum.
13759		S. Hailey			<p><b>Requirement Violated:</b></p> <p>MCP-2988; Step 4.4.3 requires that the AKE initiates an NCR if a waste matrix code or HWN change is required for a specific subset of drums within a waste stream.</p> <p><b>Actions:</b></p>