



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
February 7, 2001

 **ENTERED**



Mr. Steve Zappe, Project Leader
Hazardous Waste Bureau
New Mexico Environment Department
2044-A Galisteo Street
Santa Fe, New Mexico 87505


RE: Carlsbad Field Office Monthly Nonconformance Report Summary

Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports for the period of December 24, 2000 through January 24, 2001. The Summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, Section B3-1, subsection titled, *Nonconformance to Data Quality Objectives (DQOs)*.

If you have any questions or concerns, please contact Samuel A. Vega at (505) 234-7423.

Sincerely,


Dr. Inés R. Triay
Manager

Enclosure

cc w/o enclosure:
J. Bearzi, NMED
J. Kieling, NMED
S. Dinwiddie, NMED



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
January 01 – January 31, 2001

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 January 01, 2001 through January 31, 2001 there were three nonconformance reports generated by TRU waste generator sites. Two reports were identified by the Rocky Flats Environmental Technology Site (RFETS), the other was identified by the Idaho National Engineering and Environmental Laboratory (INEEL).

List of ALL NCR Between the following Dates

Latest Start Date - 01/01/2001

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

Earliest End Date - 01/31/2001

Assigned NCR Number Site NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed Trend Cause Code:	Deficiency
20	RFETS	01/09/2001	01/10/2001	01/09/2001	When collecting the headspace sample from drum D99257, the sample team recorded the wrong drum number. At the end of the day, the 0936 logbook entry for 12/21/00 incorrectly recorded D99256 (see logbook page copy, attached). The waste stream ID for D99256 is RF 001, consistent with the other drums in the composit. At the data generator level, the discrepancy was discovered when reconciling the sample logbook with the drum aging criteria sheets. The discrepancy was confirmed with project level paperwork and the drum number for this sample was changed from D99256 to D99257. By the time the drum number was corrected in the logbook, the D99257 sample had been incorrectly composited with RF001 the waste stream.
2001-000053	Rocky Flats Environmental and Technology Site	J. J. Reynolds		3.2 Inattention to detail	<p>Requirement Violated:</p> <p>95-QAPjP-0050, Rev. 4, Section B-3a(1)</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Reject composite sample C12260007. The Form 1A for this sample will be clearly marked, indicating that the results are rejected. 2. Insert a copy of this NCR in the 2001-060 data package. 3. Note the presence of the NCR in the 2001-060 case narrative. 4. Inform the sampling team of the transcription error and stress the importance of attention to detail.

Assigned NCR Number Site NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed Trend Cause Code:	Deficiency
21	RFETS	01/17/2001	01/18/2001	01/18/2001	The retention time of the internal standard in the calibration verification standard failed to meet the 30 seconds criteria. The actual time was 33 seconds or an increase in time of 10%.
2001-000096	Rocky Flats Environmental and Technology Site	D. E. Guthrie		4.2 Error in equipment or material selection	<p>Requirement Violated:</p> <p>95-QAPjP-0050, Rev. 4, Section B3, GC/MS</p> <p>Actions:</p> <ol style="list-style-type: none"> 1) no machinery malfunction was found by the chemist 2) %D was OK profile for continuing calibration was examined and no evidence of false positives or negatives existed 3) raw data profile was reviewed and the Q-value was 96% LCS was run on the data and %R was OK. <p>Since this was the first activity on a Monday morning, environmental and mechanical conditions are suspect as extenuating circumstances and the time was exceeded only by three (3) seconds. Therefore, there doesn't seem to be any impact on the data quality, and the data is usable as is; thus justifying why no re-run was performed.</p>
22	INEEL	01/29/2001	01/29/2001	OPEN	Two containers IDRF003101192 (RTR010009) and IDRF000242759 (RTR010008) require the hazardous waste number (HWN) D002 to be added to the containers because of the presence of lead acid batteries. In this case the results of the RTR indicated a HWN that is inconsistent with the assignments made through AK documentation.
22131	Idaho National Engineering and Environmental Laboratory	S. Hailey		To Be Assigned	<p>Requirement Violated:</p> <p>MCP-2988 (Step 4.5.3) requires that an NCR be generated if the results of confirmatory analytical techniques are inconsistent with AK documentation and the HWN change is required for a specific subset of drums within a waste stream. Also, this condition shall be reportable to the CBFO within five calendar days of the identification.</p> <p>Actions:</p> <p>Justification/Actions to Implement Disposition:</p> <ol style="list-style-type: none"> 1. Complete RWMC Form-161, INEEL Acceptable Knowledge Resolution Checklist. 2. IDRF003101192 and IDRF000242759 need to be staged. 3. HWN D002 needs to be added to the containers associated with this NCR in TRIPS.