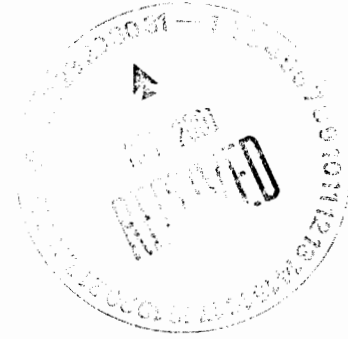




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 28, 2001

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 February 24, 2001 through March 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 Mr. 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
February 24 – March 24, 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 February 24, 2001 through March 24, 2001 there were four reportable nonconformance reports generated by TRU waste generator sites. One report was identified by the Rocky Flats Environmental Technology Site (RFETS), the other three were identified by the Idaho National Engineering and Environmental Laboratory (INEEL).

List of All NCR Between the following dates:

Latest Start Date - 02/24/2001

Earliest End Date - 03/24/2001

Assigned NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed	Deficiency
Site NCR Number				Trend Cause Code:	
24	RFETS	02/21/2001	02/26/2001	02/22/2001	Continuing calibration is required at the beginning of the run, end of the run and after every ten samples. For analytical batches SD122600 and SD11601, eleven samples were analyzed betweenCCV1/CCB1 and CCV2/CCB2.
2001-000265	Rocky Flats Environmental and Technology Site	J.J. Reynolds		3.3	<p>Requirement Violated:</p> <p>95-QAPjP-0050 Table B3-9</p> <p>Actions:</p> <p>NCR written. In the future, data reviewers will pay close attention to the number of samples between calibration verification samples. All of the laboratory QC data collected during analytical batch SD122600/SD011601 show that the instrument performed within the data quality objectives established at the Quality Assurance Project Plan (see the Data Evaluation Section in the NCR). Therefore, SD122600/SD011601 data may be used as is.</p>

Assigned NCR Number Site NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed Trend Cause Code:	Deficiency
25	INEEL	01/25/2001	02/28/2001	02/28/2001	Batch ECL01019, IDRF002301498 This drum sample was composited with four other samples. Subsequently, the IDC for this sample was changed from IDC 440 to IDC 375. All samples in the composite are not from the same waste stream. The samples affected are: ID011401EI396, ID011401EI448, ID011401EI515, ID011401EI139, AND ID01140111EI508. ID011401EI508 was the sample that had the IDC change. This a sampling issue since the RTR batch was completed after the PRF sampling batch was started.
22144	Idaho National Engineering and Environmental Laboratory	W. Blair		3.2 Inattention to detail	Requirement Violated: TPR-1728; Rev.33; Section 4.1.5; states: "Verify that all drums to be sampled come from the same lot and record on Form-194. N/A if not Composite Sampling." Actions: 1. Permanently reject the 5 containers from the PRF and ECL batches, referencing this NCR. 2. Resample the 4 containers in a new PRF batch and reanalyze. 3. Update TPR-1572 with a step to verify the drum has been completed through DGL validation for the associated RTR batch prior to sampling. 2/28/2001 by Richard A Nesmith Actual Actions Taken: All 5 drums were rejected from PRF batch and the 4 drums were resampled in PRF010048. A change to TPR-1572 which requires verification of DGL validation prior to manual HSS will NOT be made. The RTR TPR does not relate to performance of manual HSS.

Assigned NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed	Deficiency
Site NCR Number				Trend Cause Code:	
26	INEEL	02/28/2001	03/05/2001	OPEN	RTR Batch RTR010047 identifies a replicate scan for drum # IDR004101294. The TS did not record the comparison information in the comments section of the Replicate Event screen.
22831	Idaho National Engineering and Environmental Laboratory	B. Lowman		3.2	Requirement Violated: MCP-1815 Section 4.1.2.1 (F) states "Perform an evaluation of the replicate scans and record the comparison information and the conclusions in the comment section of the Replicate Event Screen". Actions:
27	INEEL	03/19/2001	03/21/2001	OPEN	ANL Visual Batch #: WCV-007554, Container #: IDR0741205766 The visual inspection information from the Waste Categorization Summary form for the above batch and drum were not properly entered into TRIPS as viewed on the ANL Visual Batch screen. Specifically, the 55 gal. steel drum (26.8 kg) was not listed in the TRIPS material parameter section causing the total mass of the container found in TRIPS to be 26.8 kg less than the total sum of the container mass found on the hard copy Waste Categorization Summary Form.
23129	Idaho National Engineering and Environmental Laboratory	W. Blair		3.2	Requirement Violated: WAP B3-10: requirements for raw data collection and management. See the Quality Assurance Data Review VE container/batch checklist (QADR); question 13. This is found in ANL-W Document: NT-AP-03; TWCP Data Generation-Level Review; Doc No. W0102-0125-AP-12 of 11/17/00. Actions: