



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
September 5, 2001

Mr. Steve Zappe, Project Leader
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive Bldg. E
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 July 24, 2001 through August 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. Thomas J. Reese at (505) 234-7311.

Sincerely,

A handwritten signature in cursive script that reads "Inés R. Triay".

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
July 24 – August 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 July 24, 2001 through August 24, 2001 there were four reportable nonconformance reports generated by a total of two TRU waste generator sites, the Idaho National Engineering and Environmental Laboratory (INEEL) and the Los Alamos National Laboratory (LANL) each reported two non-conformances.

Assigned NCR Number Site NCR Number	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed	Deficiency
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44 NCR 24394	INEEL = Idaho National Engineering and Environmental Laboratory	06/20/2001 Betty Tolman	07/25/2001	07/18/2001	
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During RTR examination (RTR010334), IDRF004002638 was determined to consist primarily of metal debris, and the IDC was changed from IDC 376 to IDC 480 (NCR 24291). The drum contains both metal debris (INW296.001) and filter media (INW211.001). The HWNs for both waste streams were assessed under AK resolution AK-01-241. The AK assessment assigns the container HWN D005 (barium) due to the presence of the filter media. D005 is not an assigned HWN of the light metals (INW296.001) waste stream.

Requirement Violated:

MCP-2988; Section 4.5.3; "... initiate an NCR if a waste matrix code or HWN change is required for a specific subset of drums within a waste stream."

Actions:

07/11/2001 by Betty J Tolman Actual Actions Taken: Lot INW296.003.HS has been created for IDC 480 drums that also contain filter media. IDRF004002638 has been assigned to INW296.003.HS, and all applicable HWNs, including D005, have been added to the drum in TRIPS. These actions were documented using RWMC Form 161, INEEL Acceptable Knowledge Resolution Checklist, and the checklist was assigned AK-01-250.

Action Completed on: 07/10/2001

NOTE: Please ensure that this NCR contains enough documentation to serve as a stand-alone record of the nonconformance and actions taken to correct it. Attach any documentation supporting the completion of the actions. Verify that the as-built documents identified in the disposition have been revised or their engineering change forms have been approved. Ensure that all applicable Nonconformance/Conditional Use tags associated with this NCR have been retrieved from the item.

Comments:

None

<u>Assigned NCR Number</u> Site NCR Number	<u>Responsible Organization</u>	<u>Date Notified</u> By:	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
45 NCR 01-217	LANL = Los Alamos National Laboratory	07/23/2001 M. C. Baker	08/01/2001	OPEN	The PE Curie calculation in the HENC spreadsheet was found to be in error for the isotopes other than the plutonium isotopes and americium-241. This causes the incorrect total PE Curies to be reported on the HENC radioassay data sheet in some cases. In every case the PE curie value is reported as too high, so all containers still meet the PE curie limit as specified in the WIPP WAC.

Requirement Violated:

Inadequate software quality assurance evaluation of the HENC spreadsheets.

Actions:

1. Correct PE curie calculations in the HENC spreadsheet
2. Generate new SQA spreadsheet validation for the HENC spreadsheet. Include tests for each individual isotope in all summation terms reported on the radioassay data sheet.
3. Evaluate all NDA spreadsheets (HENC, PAN and TGS) using a similar SQA process as developed for action 2.
4. For each waste container certified by the HENC:
 - a. For drums collected under TWCP-DTP-1.2-048 reprint the radioassay data sheets (RDS) and associated HENC spreadsheet if the amount of Np-237 is non-zero. This applies to all data processed with HENC 03x.xls.
 - b. For drums collected under TWCP-DTP-1.2-059 reprint the RDS and associated HENC spreadsheet for each container. This applies to all data processed with HENC02x.xls and HENC03x.xls.
 - c. Have all BDR reviewers review changes and initial and date the BDR coversheet.

Comments:

None

46 NCR 01-213	LANL = Los Alamos National Laboratory	07/19/2001 Mavis Lin	08/06/2001	08/03/2001	The headspace gas analysis data for drum 57050 has been documented in LA00-hgas-011 with record TWCP-4725. The concentration of acetone in drum 57050 was reported as 10U in the Analysis Summary Table section of the BDR. However, the correct concentration should be 100U since acetone was not detected. The reported MDL (method detection limit) for acetone was 16.12 ppmv, which is greater than the 10 ppmv. Flag J shall only be assigned to analyte with concentration less than the PRQL but greater than the MDL.
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Requirement Violated:

Transcription error

Actions:

The concentration of acetone for drum 57050 needs to be corrected to 100U in the Analysis Summary Table. Record TECP-4725 needs to be superseded.

Comments:

None

<u>Assigned NCR Number</u> Site NCR Number	<u>Responsible Organization</u>	<u>Date Notified</u> By:	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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47 22359	INEEL = Idaho National Engineering and Environmental Laboratory	02/06/2001 V. Medina	08/02/2001	03/30/2001	
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During independent review of HSS gas sampling operations of IDC 440 glass drums, it was noted by the reviewer that the Drum Age Criteria Sheet noted the summary code for the waste as S5000 which is debris waste. According to the AK documentation the summary code should be S3000. Since the glass is S3000 the aspiration times for these drums are 225 days. After a review of RTR records and discussions with S. Hailey it was determined that this waste stream should not be in the S3000 summary code and should actually be included in the debris waste category S5000 which has a lesser aspiration time of 142 days. The AK documentation must be updated to change this waste form to the S5000 category.

Requirement Violated:

TPR-1728 Headspace Gas Sampling; EDF-RWMC 363

Actions:

1. Change the Waste Matrix Code. There are several pieces to this. First and most important is to get the change made within TRIPS. TDCR-439 has been submitted for this purpose. The other steps needed for the Waste Matrix Code change are a creation of an AK resolution checklist and revision to EDF-805. The AK resolution checklist is complete (AK-01-085). The revision to EDF-805 is underway.
2. Submit a TCR in TRIPS to change the WMC for existing glass drums that are past the TS stage of review.
3. Have all of the batches affected by step 2 been re-signed by Level I QA and above. Corrective Actions (CA) Taken: 3/29/2001 by Sheila M Hailey Actual Actions Taken: 1. TDCR-439 changed the reference data in TRIPS for IDC 440 on the waste matrix code to S5122. EDF-805 (See DAR 31920) was revised to change the waste matrix code for IDC 440 to S5122. These two steps made the appropriate documentation consistent with the recommendation of AK-01-085.
2. TCR-1534 was initiated to change the waste matrix code for batches that were already past the TS stage of review. During the implementation of this TCR, it was determined that it would not be necessary for any of the batches to be re-signed because the waste matrix code is not associated with any signatures until the Miscellaneous Characterization Event. Therefore TCR-1534 was closed out and TCR-1601 was initiated. TCR-1601 used SQL to change the waste matrix code for all IDC 440 containers to S5122.
4. This step was unnecessary. See TCRs 1534 and 1601 Action Completed on: 03/28/2001

Comments: