



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

December 10, 2001



Mr. Steve Zappe, Project Leader
Hazardous Materials Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive Bldg. 1
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 NCR Summarization Report. The NCR Summary Report is for Site-Generated Nonconformance Reports received at CBFO during the period of October 24, 2001 through November 24, 2001. The Summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, Section titled, *Nonconformance to Data Quality Objectives (DQOs)*.

If you have any questions or concerns, please contact Thomas J. Reese of CBFO at (505) 234-7311.

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
October 24 – November 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 October 24, 2001 through November 24, 2001 there were six reportable nonconformance reports generated by the *Rocky Flats Engineering and Environmental Site* (RFETS) and one reportable nonconformance generated by the *Idaho National Engineering and Environmental Laboratory* (INEEL), both TRU waste generator sites.

<u>NCR Number: CRFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Notified</u> <u>By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
49 2001-001378	RFETS = Rocky Flats Environmental Technology Site	11/01/2001 C. Ferrara	11/09/2001	11/06/2001	<p>The RFETS TRU Waste Characterization Program Quality Assurance Project Plan (95-QAPJP-0050) and certain implementing procedures are not in compliance with the WIPP Hazardous Waste Facility Permit Waste Analysis Plan (WAP). This noncompliance resulted from the NMED rejection on September 24, 2001 of several Class 1 permit modifications. The rejected Class 1 permit modifications to the WAP are as follows:</p> <ol style="list-style-type: none"> (1) Use of composited headspace gas data to allow up to 20 composited samples, (2) Establishing safety considerations for Visual Examination (VE), and (3) Requirements for headspace gas sampling through existing filter vent hole. <p>The affected implementing procedures are the following: L-4146, Headspace Gas Sampling of Waste Containers, L-4148, Preparation of Samples and Calibration Standards for Determination of Gases in Sample Canisters, L-5017, HVOC Data Review and Validation (Data Generator Level), L-4231, Headspace Gas Sampling and Analysis Using an Automated Manifold, WIPP-009, RCRA Characterization of TRU Waste to be Disposed of at WIPP, WIPP-010, WIPP TRU Waste Characterization Project Level Data Review and Reporting, and 4-H80-776-ASRF-007, Visual Verification for Confirmation or RTR.</p> <p>Requirement Violated: TWCP QAPJP, L-4146, L-4148, L-5017, L-4231, WIPP-009, WIPP-010</p> <p>Actions: Make changes to the QAPJP and L-4146, L-4148, L-5017, L-4231, WIPP-009, WIPP-010 to comply with the NMED rejection of the three Class 1 modifications identified in the Identification section above. Cancel 4-H80-776-ASRF-007 since visual examination to confirm RTR is no longer performed in building 776.</p> <p>Comments: None</p>
50 2001-001379	RFETS = Rocky Flats Environmental Technology Site	11/26/2001 C. Ferrara	11/09/2001	OPEN	<p>Use of composited headspace gas data for samples composited with 5 or less samples for drums characterized prior to September 24, 2001 is not in compliance with the WIPP Hazardous Waste Facility Permit Waste Analysis Plan (WAP) if the drums were not disposed of at WIPP by November 27, 2001. This noncompliance resulted from the NMED rejection on September 24, 2001 of the Class 1 modification on use of composited headspace gas data for composites of five or less samples.</p> <p>Requirement Violated: WIPP Waste Analysis Plan</p> <p>Actions:</p> <p>Comments: None</p>
51 2001-001380	RFETS = Rocky Flats Environmental Technology Site	11/26/2001 C. Ferrara	11/09/2001	OPEN	<p>The batch data reports identified in attachment 1 do not meet the requirements of the WIPP Hazardous Waste Facility Permit Waste Analysis Plan (WAP). This nonconformance resulted from the NMED rejection on September 24, 2001 of the Class 1 modification on use of composited headspace gas data for composites of six or more samples.</p> <p>Requirement Violated: WIPP Waste Analysis Plan</p> <p>Actions:</p> <p>Comments: None</p>

<u>NCR Number & CRO Assigned</u>	<u>Responsible Organization</u>	<u>Date Notified</u> By:	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
52 2001-001381	RFETS = Rocky Flats Environmental Technology Site	11/26/2001 C. Ferrara	11/09/2001	OPEN	The selection of drums or SWBs from a visual examination to confirm radiography grouping that replaced one or more randomly selected drums or SWBs based on safety conditions is not in compliance with the requirements of the WIPP Hazardous Waste Facility Permit Waste Analysis Plan (WAP). This nonconformance resulted from the NMED rejection on September 24, 2001 of the Class 1 permit modification on establishing safety conditions for visual examination (VE). Requirement Violated: WIPP Waste Analysis Plan Actions: Comments: None
53 2001-001382	RFETS = Rocky Flats Environmental Technology Site	11/26/2001 C. Ferrara	11/09/2001	OPEN	Collection of headspace gas samples through the existing filter hole for headspace gas sampling conducted on or after September 24, 2001 is not in compliance with the WIPP Hazardous Waste Facility Permit Waste Analysis Plan (WAP). This nonconformance resulted from the NMED rejection on September 24, 2001 of the Class 1 permit modification on headspace gas sampling through an existing filter vent hole. Requirement Violated: WIPP Waste Analysis Plan Actions: Comments: None
54 2001-001528	RFETS = Rocky Flats Environmental Technology Site	11/26/2001 C. Ferrara	11/09/2001	OPEN	Collection of headspace gas samples through the existing filter hole for headspace gas sampling conducted prior to September 24, 2001 is not in compliance with the WIPP Hazardous Waste Facility Permit Waste Analysis Plan (WAP), if the drum was not disposed of at WIPP by November 27, 2001. This nonconformance resulted from the NMED rejection on September 24, 2001 of the Class 1 permit modification on headspace gas sampling through an existing filter vent hole. Requirement Violated: WIPP Waste Analysis Plan Actions: Comments: None
55 25837	INEEL = Idaho National Engineering and Environmental Laboratory	01/01/1029 R. Wislon	11/06/2001	OPEN	TRU waste container headspace gas samples were composited at greater than a 5 to 1 ratio. The subject containers were still in inventory as of 9/24/01, when compositing of headspace gas samples was discontinued. A Class 1 modification to the WAP was disapproved by NMED which placed all of the attached list of drums in noncompliance with the current WIPP WAP. NOTE: Containers with prior composited samples, in accordance with prior permit conditions, have been knowingly accepted at WIPP. Requirement Violated: WIPP WAP; B-3a(1) "Every TRU mixed waste container or statistically selected containers from waste streams that meet the conditions for reduced headspace gas sampling listed in this section will be sampled and analyzed to determine the concentrations of VOCs (presented in Table B-3) in headspace gases". Actions: Comments: