



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
August 14, 2002

Mr. Steve Zappe, Project Leader
Hazardous Materials Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive, Bldg. 1
Santa Fe, Nm 87502-6110

Subject: Carlsbad Field Office Monthly Nonconformance Summarization Report and
Plan and Procedure Change Report

Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Field Office (CBFO) Monthly NCR Summarization Report. The NCR Summarization Report lists site-generated Nonconformance Reports (NCRs) received at the CBFO during the period of June 24, 2002 through July 23, 2002. The summary is transmitted per the requirement contained in the WIPP Hazardous Waste Facility Permit, Section B3-1, *Nonconformance to Data Quality Objectives (DQOs)*.

Also enclosed are the CBFO Plan and Procedure Change Report. The Plan and Procedure Change Report lists document changes that affect performance criteria or data quality and were approved by CBFO during the period of June 1, 2002 through June 30, 2002. This report is transmitted per the requirements contained in the WIPP Hazardous Waste Facility Permit, Section B3-15, *Changes to WAP-Related Plans or Procedures*, and Section B5-2, *Document Review, Approval, and Control*.

If you have any questions or concerns, please contact Ms. Ava L. Holland at (505) 234-7423.

Sincerely,

Dr. Inés R. Triay
Manager

Enclosure

cc: w/o enclosure
J. Kieling, NMED
J. Bearzi, NMED
A. Holland, CBFO



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
June 24, 2002 – July 23, 2002

This summary is submitted in compliance with the requirements of the WIPP Hazardous Waste Facility Permit, Section B3-1, Nonconformance to Data Quality Objectives (DQOs).

During the period of June 24, 2002 through July 23, 2002 there were five reportable Nonconformance Reports (NCRs), four generated by the *Idaho National Engineering and Environmental Laboratory (INEEL)* and one by the *Rocky Flats Environmental and Technology Site (RFETS)*, while characterizing waste at TRU waste generator sites.

List of ALL NCR Between the following Dates

Latest Start Date = 6/24/2002

Earliest End Date = 7/23/2002

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

NCR Number: CBFO Assigned Site Assigned:	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed	Deficiency
76 2002-000829	RFETS = Rocky Flats Environmental Technology Site	7/11/2002 K.K. Henderson	7/12/2002	7/12/2002	<p>Cyclohexane was misidentified in the 5/9/02 initial calibration used to quantitate the sample results for HGAS-DP-00093, Batch No: 02W0098.....During the generation of the initial calibration analyzed on the automated headspace gas instrument GB-03, the incorrect compound was identified as cyclohexane. The mix up resulted in an erroneous response factor for cyclohexane. The response factor is used to quantitate sample results.</p> <p>Requirement Violated: L-4231-F</p> <p>Actions: The 05/09/02 initial calibration and the analytical data associated with HGAS-DP-00093, Batch No: 02W0098 were reprocessed. The reprocessed data was reviewed and inserted into the data package. The final reported results did not change with the following exception. The Hydrogen result for sample DC3964 was changed from 0.01 U to 0.02 J.</p> <p>Comments:</p>
77 28499	INEEL = Idaho National Engineering and Environmental Laboratory	7/5/2002 Kenneth Logue	7/8/2002	OPEN	<p>Drum # IDRF074112361 weight labels don't match . Upper drum label states drum weight as 487 lbs. Lower drum label stated drum weight as 449 lbs . This weight of 449 lbs was recorded in TRIPS . The drum was reweighed and the actual weight is 487 lbs.</p> <p>Requirement Violated: TPR-1648</p> <p>Actions: Implement Disposition: 1. Reweigh drum, enter information into TRIPS, and relabel drum. (K. Farmer) 2. Demote data out of WWIS. (J. Baker) 3. Demote RTR010348 and SAS01301 for rework. (L. Frost) 4. Update RTR event screen to correspond with new weight as appropriate. (C. Fife) 5. Update SAS event screen to correspond with new weights if appropriate. (C. Fife)</p> <p>Comments:</p>
78 28500	INEEL = Idaho National Engineering and Environmental Laboratory	7/6/2002 Kenneth Logue	7/8/2002	OPEN	<p>Drum weights don't match for drum IDRF741205508 . Scale wt. is 435 lbs ; label on drum is 437 lbs ; drum wt. in TRIPS is 440 lbs .</p> <p>Requirement Violated: TPR-1648 4.2.4.2.1 and 4.7.3.2.2</p> <p>Actions: Justification/Actions to Implement Disposition: 1. Reweigh drum, enter information into TRIPS, and relabel drum. (K. Farmer) 2. Demote data out of WWIS. (J. Baker)</p>

<u>NCR Number: CBFO Assigned Site Assigned:</u>	<u>Responsible Organization</u>	<u>Date Notified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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3. Demote RTR010208 and SAS010180 for rework. (L. Frost)
4. Update RTR event screen to correspond with new weight as appropriate. (C. Fife)
5. Update SAS event screen to correspond with new weights if appropriate. (C. Fife)

Comments:

79 28561	INEEL = Idaho National Engineering and Environmental Laboratory	7/12/2002 Kenneth Logue	7/15/2002	OPEN	Drum weight does not match on drum IDRF741204453 . The drum label wt is listed as 534 lbs. The PATCD wt listed in TRIPS is 435 lbs. The actual wt. is 533.5 lbs.
					Requirement Violated: TPR-1648 4.2.4.2.1
					Actions: Justification/Actions to Implement Disposition: 1. Reweigh drum, enter information into TRIPS, and relabel drum. (K. Farmer) 2. Demote data out of WWIS. (J. Baker) 3. Demote RTR010516 and SAP020020 for rework. (L. Frost) 4. Update RTR event screen to correspond with new weight as appropriate. (C. Fife) 5. Permanently reject drum from SAP batch. (C. Fife) 6. Reexamine the waste container through SAP. (K. Farmer)
Comments:					

80 28591	INEEL = Idaho National Engineering and Environmental Laboratory	7/17/2002 Ashby Reed	7/18/2002	OPEN	Drum # IDRF005500437 weight labels are conflicting. TRIPS records the weight as #242, and the actual weight is #141.
					Requirement Violated: TPR-1648
					Actions: Justification/Actions to Implement Disposition: 1) Reweigh drum, enter information into TRIPS, and relabel drum. (Mike Johnson) 2. Demote data out of WWIS. (J. Baker) 3) Demote RTR and Assay batches associated with this drum for rework. (Lisa Frost) 4) Update RTR event screen to correspond with new weight as appropriate. (Cindy Fife) 5) Permanently reject drum from assay batch. (C. Fife) 6) Perform new assay of drum. (Mike Johnson)
Comments:					

PLAN AND PROCEDURE CHANGE REPORT

June 1, 2002 – June 30, 2002

This report is submitted in compliance with the requirements of the WIPP Hazardous Waste Facility Permit, Section B3-15, Changes to WAP-Related Plans or Procedures, and Section B5-2, Document Review, Approval, and Control.

During the period of June 1, 2002 through June 30, 2002 there were five reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Central Characterization Project (CCP)*, the *Hanford Site*, and the *Idaho National Engineering and Environmental Laboratory (INEEL)*. The changes were approved by CBFO during June 2002.

Plan and Procedure Change Report, June 1- 30, 2002

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
RP 433	6/6/2002	CCP-TP-002, R9, CCP Reconciliation of DQOs and Reporting Characterization Data (All Sites)	CCP added analytes to the UCL90 evaluation form to cover all potential TRU waste sites (e.g. formaldehyde for LANL, hydrazine for ORNL).

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
RP 446	6/6/2002	WMP-400, Section 8.1.8, R10, Headspace Gas Sampling and Analytical Results	Hanford added requirement for the independent technical reviewer to verify that data is reported using correct units and number of significant figures.
RP 467	6/10/2002	WMP-400, Section 7.1.4, R9, Draft, Sampling Design and Data Analysis for RCRA Characterization and Visual Examination of Retrievably Stored Transuranic Waste	Hanford clarified how analyte concentrations that are less than the detection limit are handled while assessing distribution normality.
RP 428	6/19/2002	WMP-400, Section 7.1.1, R12, TRU Waste Characterization Data Quality Objectives Reconciliation and Reporting	Hanford added trans-1,2-Dichloroethylene to the data summary report and clarified the TIC reporting requirements.

Plan and Procedure Change Report, June 1- 30, 2002

INEEL

Tracking #	CBFO Approval Date	Document Title	Change Description
RP 483	6/17/2002	ACLP-4.10, R4, Determination of Method Detection Limits for Gas Analysis - Addition of Chloromethane to HSG Target Analyte List (Addition of choromethane to HSG target analyte list)	INEEL added chloromethane to the target analyte list.
