



Department of Energy

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

September 27, 2002

SEP 28 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 August 24, 2002 through September 23, 2002. This 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 August 1, 2002 through August 31, 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, CBFO Quality Assurance Manager, at (505) 234-7423.

Sincerely,

Dr. Inés R. Triay
Manager

Enclosure

cc: w/o enclosure

J. Kieling, NMED *ED

J. Bearzi, NMED *ED

A. Holland, CBFO *ED



Mr. Steve Zappe

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September 27, 2002

bcc: w/enclosure

L. Chism, CBFO *ED

M. Navarrete, CBFO *ED

D. Miehl, CBFO *ED

B. Kehrman, WTS *ED

P. Roush, WTS

CBFO QA File

CBFO M&RC

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J. Plum, CBFO *ED

L. Steven, WTS *ED

A. Pangle, CTAC *ED

MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
August 24, 2002 – September 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 August 24, 2002 through September 23, 2002 there were two reportable Nonconformance Reports (NCRs), one generated by the *Idaho National Engineering and Environmental Laboratory* (INEEL) and one by the *Los Alamos National Laboratory* (LANL), while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 8/24/2002

Earliest End Date = 9/23/2002

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

NCR Number: CBFO Assigned	Responsible Organization	Date Notified By:	Date NCR Received	Date Closed	Deficiency
89 NCR-02-143	LANL = Los Alamos National Laboratory	8/17/2002 Pam Rogers	8/26/2002	OPEN	<p>Possible miscertification. During AK reconciliation, we noticed that the VE WMC for drum S870118 was assigned as S5310 (plastic, rubber debris) while the WMC assigned by RTR was S5110 (metal debris). No comment on the VE BDR review form was made to reconcile these assignments.</p> <p>Requirement Violated: VE BDR LA02-VE-031, RTR-VE Reconciliation forms</p> <p>Actions: Rework. Redo review of VE BDR at the project level (VE-RTR Reconciliation step) to determine if this is a miscertification or provide an explanation of why it is not.</p> <p>Comments: None</p>
90 WIPP-SPO- 29067	INEEL = Idaho National Engineering and Environmental Laboratory	9/10/2002 Betty Tolman	9/12/2002	OPEN	<p>Headspace gas analyses for the attached list of First/Second Stage Sludge drums indicate high concentrations for m- and p-xylene. A statistical evaluation of the analytical data across the waste stream (INW216.001) indicate that inclusion of these drums in the candidate inventory results in a 90% confidence level that exceeds the PRQL. This is inconsistent with the Waste Stream Profile for First and Second Stage Sludges. Unfortunately, these drums were reconciled under WSPF INW216.001 and certified.</p> <p>Requirement Violated: MCP-2527; Rev. 13; DQO Reconciliation at SPO Level</p> <p>Actions: Justification/Actions to Implement Disposition:</p> <ol style="list-style-type: none"> 1. Demote containers out of WWIS (J. Baker/M. Griffin Due: 9/16/02) 2. Unsign Misc. CT & CZ signatures (J. Baker/M. Griffin Due: 9/18/02) 3. Pull drums out of waste stream INW216.001 and segregate in a different lot. (B. Tolman Due: 9/19/02) <p>Comments: None</p>

PLAN AND PROCEDURE CHANGE REPORT

August 1, 2002 – August 31, 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 August 1, 2002 through August 31, 2002 there were three reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Hanford Site*, the *Los Alamos National Laboratory* (LANL), and the *Rocky Flats Environmental and Technology Site* (RFETS). The changes were approved by CBFO during August 2002.

Plan and Procedure Change Report

Start Date: 8/1/2002

End Date: 8/31/2002

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
02-2776	8/15/2002	WRP1-OP-0908, G-6, Operation of the Drum Nondestructive Examination System	Revised to address CAR 02-071 concerning full radiography examination of waste containers.

LANL

Tracking #	CBFO Approval Date	Document Title	Change Description
02-2786	8/20/2002	TWCP-DTP-1.2-008, R8, IC4, Performing Nondestructive Testing Using the Mobile Real-Time Radiography System	Revised to enhance requirements for inventory of waste items and verbal description on RTR video tape.

RFETS

Tracking #	CBFO Approval Date	Document Title	Change Description
02-2806	8/27/2002	PRO-860-RS-0156, R1, DC-05, Solid Sampling, Building 371	Enhanced instructions concerning sample storage temperatures, sample equipment cleanliness, sampling data sheet information, and packaging of waste remaining after sampling.