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 September 24, 2002 through October 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 September 1, 2002 through September 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 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

*ED denotes electronic distribution

CBFO:QA:ALH:GS:02-1941:UFC 2300.00
MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
September 24, 2002 – October 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 September 24, 2002 through October 23, 2002 there were three reportable Nonconformance Reports (NCRs), two generated by the Rocky Flats Environmental and Technology Site (RFETS) and one by the Westinghouse-TRU Solutions/Central Characterization Project (WTS/CCP), while characterizing waste at TRU waste generator sites.
<table>
<thead>
<tr>
<th>NCR Number: 2002-001274</th>
<th>Responsible Organization</th>
<th>Data Notified</th>
<th>Data NCR Received</th>
<th>Data Closed</th>
<th>Deficiency</th>
</tr>
</thead>
</table>
Actions:  
The drums and SWBs were RTRed on August 12 and 13, 2002, and were not covered by a resolution check because the test pattern was damaged during start up on PM shift of August 12, 2002. The test pattern was repaired and returned to service at the end of day shift on August 13, 2002. Upon return to service, the resolution check was found to be acceptable. The acceptable test pattern is recorded on Tape 5T-0304. Therefore, the RTR data contained in these two batch data reports is acceptable for use.  
Comments: None |

<table>
<thead>
<tr>
<th>NCR Number: 2002-001277</th>
<th>Responsible Organization</th>
<th>Data Notified</th>
<th>Data NCR Received</th>
<th>Data Closed</th>
<th>Deficiency</th>
</tr>
</thead>
</table>
| RFETS = 10/4/2002     | Rocky Flats Environmental Technology Site | E.L. D'Amico | 10/7/2002 | OPEN | Requirement Violated: Composite sample C02150111 consisted of one sample from a transuranic mixed waste drum (D64013) composited with four samples from four transuranic non-mixed waste drums (D97136, D99429, D90472 and D98017). Therefore, all containers used in composite sample C02150111 were not from the same waste stream.  
Actions:  
OAP/P, Section B-3a(1)  
None of the affected drums have been certified or shipped to WIPP. The data (on Form 1A and 1B) for composite sample C02150111 in data package HVOC-DP-00443 will be marked as do not use. No Form 1B for sample in data package.  
Comments: None |

<table>
<thead>
<tr>
<th>NCR Number: NCR-SRS-0528-02, Rev. 0</th>
<th>Responsible Organization</th>
<th>Data Notified</th>
<th>Data NCR Received</th>
<th>Data Closed</th>
<th>Deficiency</th>
</tr>
</thead>
</table>
| WTS/CCP= 9/12/2002   | Westinghouse TRU Solutions / Centralized Characterization Project | Mark Pearcy | 10/9/2002 | 10/2/2002 | Requirement Violated: The Drum Duplicate Report and the Drum Duplicate data sheet incorrectly lists the value of Toluene for the Duplicate sample. Drum SR123375 Drum Duplicate Report states that the concentration for Toluene in the Duplicate sample is at 10.0 ppmV, which is not above the PRQL and does not meet the criteria for verifying the precision QAO. The raw data sheet, which is not included in the Batch Data Report sent to the project office, listed the actual value for Toluene in the Duplicate sample as 3.3ppmv.  
Actions:  
CCP-TP-007, Rev. 11, section 4.4.9(J) and CCP-TP-007, Rev. 11, section 1.4.6(B)  
A) The raw data sheet that was automated by the Varian software was submitted as supporting documentation that the actual value of Toluene was greater than the PRQL at 10.3 ppmV, which verified that the precision QAO was met.  
B) Disposition to SRS Waste Operations.  
C) To prevent recurrence, a software change has been made in the BDR Template. The changes include adjusting the significant figures of the concentration value within the Drum Sample Reports. This adjustment will comply with the raw data reported from the Varian software.  
Comments: None |
PLAN AND PROCEDURE CHANGE REPORT

September 1, 2002 – September 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 September 1, 2002 through September 30, 2002 there were ten 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) and the Rocky Flats Environmental and Technology Site (RFETS). The changes were approved by CBFO during September 2002.
## Plan and Procedure Change Report

### Tracking # | CBFO Approval Date | Document Title | Change Description
---|---|---|---
02-2889 | 9/23/2002 | CCP-TP-009, R9, Draft H, CCP Single Sample Manifold Data Handling Procedure | Revised and clarified QC acceptance criteria and TIC identification criteria. Also made several editorial changes.  
02-2885 | 9/23/2002 | CCP-TP-029, R8, Draft E, CCP Single Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration | Revised and clarified acceptance criteria. Also made several administrative and editorial changes.  
02-2890 | 9/23/2002 | CCP-TP-005, R8, Draft E, CCP Acceptable Knowledge Documentation | Revised procedure to clarify responsibilities and clarify how TIC data is handled during AK confirmation.
<table>
<thead>
<tr>
<th>No.</th>
<th>Date</th>
<th>Doc No./Ref. No.</th>
<th>Document Title</th>
<th>Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>02-2811</td>
<td>9/6/2002</td>
<td>95-QAPjP-0050, R6, DCF-02, Quality Assurance Project Plan</td>
<td>Revised to include sampling of newly generated waste, added reference to procedures for sampling tank sludge and polymerized liquid waste, added procedure reference to new Building 440 VE Facility, and made numerous editorial changes.</td>
<td></td>
</tr>
<tr>
<td>02-2831</td>
<td>9/6/2002</td>
<td>PRO-603-RS-0152, R2, DC-02, Data Review and Verification of Solid Sampling Batch Reports</td>
<td>Revised to extend scope of procedure to include newly generated homogeneous solid waste.</td>
<td></td>
</tr>
<tr>
<td>02-2849</td>
<td>9/10/2002</td>
<td>RS-012-004, R3, DC-04, Grid Method - Solid Sampling and Analysis Plan</td>
<td>Revised to extend scope of procedure to include newly generated homogeneous solid waste.</td>
<td></td>
</tr>
<tr>
<td>02-2867</td>
<td>9/16/2002</td>
<td>PRO-1031-WIPP-1112, R1, TRU/TRM Waste Visual Verification (V2[squared]) and Data Review</td>
<td>Revised to clarify data entry requirements when packaging activities span multiple workshifts.</td>
<td></td>
</tr>
<tr>
<td>02-2869</td>
<td>9/16/2002</td>
<td>PRO-940-WIPP-010, R15, WIPP TRU Waste Characterization Project Level Data Review and Reporting</td>
<td>Revised checklists to enhance Project Level data review.</td>
<td></td>
</tr>
<tr>
<td>Plan and Procedure Change Report</td>
<td>Start Date: 9/1/2002</td>
<td>End Date: 9/30/2002</td>
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<tr>
<td>02-2898</td>
<td>9/23/2002</td>
<td>PRO-945-WIPP-009, R6, DCF-CHG-02, RCRA</td>
<td></td>
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<tr>
<td>Characterization of TRU Waste to be Disposed of at WIPP</td>
<td>Revised requirement for removing hazardous waste codes as a result of analytical data from &quot;will&quot; to &quot;may&quot; as required by the Permit.</td>
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</tbody>
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