



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

October 29, 2002

ENTERED

OCT 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 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



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.

List of ALL NCRs Between the following Dates:

Latest Start Date = 9/24/2002

Earliest End Date = 10/23/2002

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

NCR Number: CBFO Assigned	Responsible Organization	Date Notified	Date NCR Received	Date Closed	Deficiency
91 2002-001274	RFETS = Rocky Flats Environmental Technology Site	9/26/2002 By: C.L. Ferrera	10/1/2002	OPEN	Batch Data Reports 5T-0303 and 5T-0304 do not contain documentation of the resolution check required by Procedure 4-119-NDT-00569, Real-Time Radiography Testing of Transuranic and Low-Level Waste in Building 569, Section 6.3 Resolution Verification. Requirement Violated: Procedure 4-119-NDT-00569 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
92 2002-001277	RFETS = Rocky Flats Environmental Technology Site	10/4/2002 E.L. D'Amico	10/7/2002	OPEN	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. Requirement Violated: QAPjP, Section B-3a(1) Actions: 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
93 NCR-SRS- 0528-02, Rev. 0	WTS/CCP= Westinghouse TRU Solutions / Centralized Characterization Project	9/12/2002 Mark Pearcy	10/9/2002	10/2/2002	The Drum Duplicate Report and the Drum Duplicate data sheet incorrectly lists the value of Toluene for the Duplicate sample. Drum SR123376 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 10.3ppmV. Requirement Violated: CCP-TP-007, Rev. 11, section 4.4.9 (J) and CCP-TP-007, Rev. 11, section 1.4.6 (B) Actions: 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

Start Date: 9/1/2002

End Date: 9/30/2002

CCP

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.
02-2892	9/23/2002	CCP-TP-032, R7, Draft I, CCP Single Sample Manifold Data Validation Procedure	Revised BDR content, clarified TIC identification criteria and made 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.

REETIS

Tracking #	CBFO Approval Date	Document Title	Change Description
------------	--------------------	----------------	--------------------

Plan and Procedure Change Report

Start Date: 9/1/2002

End Date: 9/30/2002

02-2811	9/6/2002	95-QAPjP-0050, R6, DCF-02, Quality Assurance Project Plan	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.
02-2831	9/6/2002	PRO-603-RS-0152, R2, DC-02, Data Review and Verification of Solid Sampling Batch Reports	Revised to extend scope of procedure to include newly generated homogeneous solid waste.
02-2849	9/10/2002	RS-012-004, R3, DC-04, Grid Method - Solid Sampling and Analysis Plan	Revised to extend scope of procedure to include newly generated homogeneous solid waste.
02-2867	9/16/2002	PRO-1031-WIPP-1112, R1, TRU/TRM Waste Visual Verification (V2[squared]) and Data Review	Revised to clarify data entry requirements when packaging activities span multiple workshifts.
02-2869	9/16/2002	PRO-940-WIPP-010, R15, WIPP TRU Waste Characterization Project Level Data Review and Reporting	Revised checklists to enhance Project Level data review.

Plan and Procedure Change Report

Start Date: 9/1/2002

End Date: 9/30/2002

02-2898

9/23/2002

PRO-945-WIPP-009, R6, DCF-CHG-02, RCRA
Characterization of TRU Waste to be Disposed of at
WIPP

Revised requirement for removing hazardous waste
codes as a result of analytical data from "will" to "may"
as required by the Permit.