



Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 25, 2003



Mr. Steve Zappe, Project Leader
Hazardous Materials Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive, Bldg. 1
Santa Fe, NM 87505-6110

RE: 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 Nonconformance Report (NCR) summarization report. The NCR summarization report lists site-generated NCRs received at CBFO during the period of February 24, 2003 through March 23, 2003. 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 February 1, 2003 through February 28, 2003. 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
February 24, 2003 – March 23, 2003

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 February 24, 2003 through March 23, 2003 there were two reportable Nonconformance Report (NCR), generated by the *Central Characterization Project (CCP)* and 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 = 2/24/2003

Earliest End Date = 3/23/2003

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

NCR Number & CBEU Assigned Site Assigned Responsible Organization Data Notified Data NCR Received Data Closed Deficiency

By: _____

98	NTS-NCR-0501-03	CP	Washington TRU Solutions / Centralized Characterization Project	3/11/2003	3/11/2003	OPEN	During SPM review of BDR NTRTR 0044, it was discovered that Drum NT000644 was part of the batch, however: 1. Drum NT000644 is not listed on the Batch Cover Sheet (Attachment 6), 2. No Radiography Data Sheet was provided for Drum NT000644, 3. No NCR documentation associated with Drum NT000644 was provided, and 4. Upon review of NCR-NTS-0103-02 and NCR-NTS-0117-02, it was discovered that these NCRs were written in reference to Batch Data Report NTRTR0044 and there was no final disposition associated with Drum NT000644 which would have removed the data from the BDR.
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Requirement Violated:

CCP-TP-045, Rev 5, Section 4.9.1 states, "Record a running commentary of waste contents, AND as necessary, note highlights on the Preliminary Container Information portion of Attachment 2, Radiography Data Sheet." Section 4.9.13 further states, "During the inspection if any items are detected to be non-permissible or suspect items, they must be documented on Attachment 2, Radiography Data Sheet." Section 4.16.7 [D] states in part, "Organize the data packages into Batch Data Report format."

The Vendor Project Manager will plan and implement corrective action

Actions:

None

Comments:

99	NCR-03-049	LA	Los Alamos National Laboratory	2/27/2003	2/27/2003	2/27/2003	For sampling BDR's: LA02-HGAS/IS-019, LA02-HGAS/IS-020, LA02-HGAS/IS-022, LA02-HGAS/IS-023, LA02-HGAS/IS-025, and LA02-HGAS/IS-026. The Equipment Blank Needle Assembly Checklist did not have the effective date of the procedure. The Headspace Gas Vent Date and Liner verification form was not marked with Attachment 2. TWCP-DTP-1.2-074, R. 1 Corrected pages in above-referenced BDRs. Data can be used as is. No impact on quality of data.
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Requirement Violated:

Corrected pages in above-referenced BDRs. Data can be used as is. No impact on quality of data.

Actions:

None

Comments:

PLAN AND PROCEDURE CHANGE REPORT

February 1, 2003 – February 28, 2003

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 February 1, 2003 through February 28, 2003, there were seventeen 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*, the *Los Alamos National Laboratory (LANL)*, and the *Rocky Flats Environmental Technology Site (RFETS)*. The changes were approved by CBFO during February 2003.

Plan and Procedure Change Report

Start Date: 2/1/2003

End Date: 2/28/2003



Tracking #	CEFO Approval Date	Document Title	Change Description
Audit1	2/3/2003	CCP-TP-034, R9, Draft E, CCP HSG Data Generation and Batch Data Reporting	Incorporated DAC modification.
03-1060	2/3/2003	CCP-TP-001, R8, Draft C, CCP Project Level Data Validation and Verification	Incorporated DAC modification.
Audit1.1	2/5/2003	CCP-TP-031, R12, Draft I, CCP Headspace Gas Sampling Using Automated Manifold	Incorporated DAC modification.
03-1075	2/5/2003	CCP-QP-006, R4, Draft D, Corrective Action Reporting and Control	Changed instructions for NCR closure.
03-1072b	2/5/2003	CCP-PO-001, R5, Draft H, CCP Transuranic Waste Characterization Quality Assurance Project Plan	Incorporated DAC modification.

Plan and Procedure Change Report

Start Date: 2/1/2003
End Date: 2/28/2003

03-1072a	2/5/2003	CCP-TP-007, R16, Draft M, CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure	Incorporated DAC modification.
03-1064	2/5/2003	CCP-TP-009, R11, Draft D, CCP Single Sample Manifold Data Handling Procedure	Incorporated DAC modification.
03-1063	2/5/2003	CCP-TP-005, R11, Draft F, CCP Acceptable Knowledge Documentation	Added clarification for assigning waste matrix codes & determining material parameters.
03-1073	2/5/2003	CCP-TP-032, R10, Draft G, CCP Single Sample Manifold Data Validation Procedure	Incorporated DAC modification.
03-1211	2/11/2003	CCP-TP-029, R11, Draft C, CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration	Added instructions for handling "E" flagged compounds.

Hanford

Tracking # CBFO Approval Date Document Title Change Description

Plan and Procedure Change Report

Start Date: 2/1/2003
End Date: 2/28/2003

03-1212 WRP1-OP-0729, RB-5, Visual Examination
Clarified waste material parameter numbers.



Change Description

Tracking # CBFO Approval Date Document Title

03-1059 2/3/2003 TWCP-DTP-1.2-074, R2, Manual Headspace Gas Sampling of LANL TRU Waste Containers for Analysis by INEEL
Incorporated DAC modification.

03-1261 2/21/2003 TWCP-PLAN-0.2.3-001, R8, Los Alamos National Laboratory Transuranic Waste Characterization Quality Assurance Project Plan
Incorporated DAC modification.



Change Description

Tracking # CBFO Approval Date Document Title

03-1098 2/10/2003 L-4038-G, WIPP Data Review and Validation for Volatile Organic Compounds
Clarified instructions for validating time of sample receipt; clarified criteria for standards, QC samples, and MPS QAOs.

Plan and Procedure Change Report

Start Date: 2/1/2003
End Date: 2/28/2003

03-1099	2/10/2003	L-4039-I, WIPP Data Review and Validation for Semi-Volatile Organic Compounds in Solid Samples	Clarified language for validating time of sample receipt, criteria for standards and QC samples, and MPS QAOs.
03-1274	2/25/2003	L-4165-M, GC/MS Determination of Volatile Organic Compounds (Solids, Liquids, and TCLP Extracts)	Added/clarified criteria for standards, surrogates, duplicates, lab blanks, method performance samples, and flags.
03-1280	2/26/2003	L-4215-F, GC/MS Determination of Total SVOCs for WIPP	Clarified criteria for RRF & RRT; added PQL for MPS.