



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
July 24, 2003

ENTERED



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 NCR Summarization Report. The NCR Summarization Report lists site-generated Nonconformance Reports (NCRs) received at CBFO during the period of June 24, 2003 through July 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 is 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, 2003 through June 30, 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 of CBFO at (505) 234-7423.

Sincerely,


Dr. Inés R. Triay *for*
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

June 24, 2003 – July 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 June 24, 2003 through July 23, 2003 there were five reportable Nonconformance Reports (NCRs), generated by the *Central Characterization Project* at the *Savannah River Site* (SRS/CCP), the *Central Characterization Project* at the *Argonne National Laboratory – East* (ANL-E/CCP), the *Rocky Flats Environmental Technology Site* (RFETS), and the *Idaho National Engineering and Environmental Laboratory* (INEEL), while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 6/24/2003

Earliest End Date = 7/23/2003

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

NCR Number: Responsible Organization Date Identified Date NCR Received Data Closed Deficiency

CBFO Assigned By:

108 CS Savannah River Site / CCP 6/24/2003 Natasha R. McCants 6/30/2003 6/24/2003

The BDR number on the BDR Cover Sheet is linked to the MDL calculation values to be used in the BDR. In HSG BDR 050703A, a space was inadvertently added to the BDR number on the cover sheet. This caused the program to incorrectly identify the MDL values to be used in the BDR. For HSG BDR 050703A, the incorrect MDL values were used when a target analyte was not detected. The MDL values listed on the Drum Sample Report sheets in HSG BDR 050703A are MDL values for the "B" instrument, and not the "A" instrument. THIS AFFECTS THE FOLLOWING CONTAINERS: SR100112, SR100645, SR100650, SR121449, SR123340, SR130562, SR130635, SR135165, SR138946, SR193934, SR194637, SR236634, SR501952, SR504253, SR543860.

Requirement Violated:

(a). Required Condition/Origin of Requirement
When a target is not detected when analyzing a container, the value for this is listed as the measured concentration on the Drum Sample Report for that analyte. (Note: procedure reference not specified by CCP in the NCR.)

Actions:

- Rework:
1. Return BDR to SRS.
 2. Correct Drum Sample Report sheets and Blank Report/QAO sheet, using MDL values for the "A" instrument.
 3. Insert a copy of this NCR into HSG BDR 050703A.
 4. Update BDR Narrative.
 5. Re-perform Data Generation Review.
 6. Re-perform Project Office (SPQAO and SPM) reviews.

HSG Operators will be briefed by supervisory personnel regarding listing the proper MDL values for analytes that are not detected, and for ensuring that data is correctly input.

Comments: None

109 CA Argonne National Lab - East / CCP 7/9/2003 Larry Porter 7/16/2003 7/14/2003

A. In BDR SQTR001, drums SQS121C1, SQS121C2, SQS121C3, SQS121C4, SQS121C5, SQS121C6, and SQS121C7 do not meet the compatibility requirement.
B. In BDR AEMOVER060103a, drum SQS121C1 does not meet the compatibility requirement.
Actual Condition: The drums listed in this NCR have absorbent material which by AK was used to absorb liquids and plastic material exceeding the 1% weight quantity. TRUCON Code SQ222 identifies the material listing as Type II.1 and II.2. The "Allowable Materials for Waste Material Types II.1 and II.2" has the following footnote b "Dry absorbents/adsorbents and other dry desiccants are allowed if they contain no absorbed or adsorbed liquids." and plastic is not listed.

Requirement Violated:

A. CCP-TP-045 4.10.1 [G] IF the potential for prohibited items being present in the drum exists based on shapes seen in the image and operator knowledge of the waste stream, THEN describe the items as follows:
[G.8] Incompatible wastes (wastes that do not match the TRUCON Code)
(in BDR SQTR001, drums SQS121C1, SQS121C2, SQS121C3, SQS121C4, SQS121C5, SQS121C6, and SQS121C7 do not meet the compatibility requirement.)
B. CCP-TP-013 Attachment 7 "indication of wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes." (in BDR AEMOVER060103a, drum SQS121C1 does not meet the compatibility requirement.)

Actions:

Use-As-Is. Technical Justification: Waste in drums SQS121C1, SQS121C2, SQS121C3, SQS121C4, SQS121C5, SQS121C6, and SQS121C7 is compatible with CCP-TP-013, Attachment 7 and contains no prohibited items (liquids, sealed containers, etc.).
Corrective Actions: 1) All RTR and VE operators will complete training "Incompatibles - What Should I Be Looking For?" and 2) A change to the TRUCON code in AK will be initiated so the TRUCON code matches the waste.

NCR Number: _____
 CBFU Assigned _____
 Site Assigned _____

Responsible Organization _____
 Date Identified _____
 By: _____

Date Closed _____
 Data NCR Received _____
 Deficiency _____

Note: Corrective Action #2 does not need to be completed prior to NCR closure. A copy of this NCR will be placed in the "Freeze" File.

Comments: None

110
 2003-000814
 RF
 Rocky Flats Environmental Technology Site
 R.A. Eschenbaum
 6/24/2003
 6/24/2003
 6/24/2003

Item I.D. # / Description: D99369 was headspace gas sampled on 1/23/02. This drum had filtered convenience cans in it that were part of NCR 2001-001383 and should have had the headspace rejected due to the issue covered by the NCR.
 Nonconformance Description: The drum was sampled on 1/23/02 but had the convenience cans filters mitigated on 3/14/02. Due to potential plugging the filters may not meet WIPP flow criteria and would not allow a valid headspace gas sample to be pulled.
 Location: Site

Requirement Violated: TWMM

Immediate Actions Taken: A hold was put on shipping this drum.
 Final Disposition: Void the data in the batch data report, HGAS-DP-00341. Remove headspace sample data for D99369 from WEMS. Resample the headspace. Scrap. Scheduled Completion Date: 6/30/03.
 Disposition Performance Results: Acceptable.
 Results/Comments/Supporting Information: Headspace gas data for D99369 was voided in BDR HGAS-DP-00341. Headspace gas sample data for D99369 was removed from WEMS (see WEMS Samples Report). D99369 will be headspace gas resampled in accordance with the TWCP.

Comments: None

111
 2003-000839
 RF
 Rocky Flats Environmental Technology Site
 Susan Sisk
 6/19/2003
 6/24/2003
 6/19/2003

Item I.D. # / Description: Batch Data Report VE-2003-006, can Z09780.
 Nonconformance Description: During the VE to confirm RTR process, can Z09780 was weighed on the scale in the glovebox in Bldg. 371. The weight of the can exceeded the scale range. The range of the scale is 0 to 3000 grams +/- 0.7 grams. The weight of the can was 3552.9 grams. This exceeded the 3000 grams maximum allowed by the scale.
 Location: Bldg. 371.

Requirement Violated: PRO-1608-VECRTR-371.

Immediate Actions Taken: None.
 Final Disposition: After further review of the video tape, it was noticed that the 8804 can that was in the Drum which contains the 8802 can with the graphite material has a checkered board label which reads net weight of 2780.9 grams. The container was weighed per instructions in repackaging procedure PRO-X32-RS-0128 Dry Residue Repackaging, Building 707, used in Building 707. This procedure requires the scales to be calibrated. The completed Appendix 7 from PRO-X32-RS-0128 for can Z09780 was retrieved from records and is attached. Appendix 7 documents that the weight of the material in the can was 2780.9 grams (the same as the weight shown on the checkered board label). Therefore, the data package VE-2003-006 will be updated to show 2.8 kg as the weight of the material. Remedial training will be done to ensure that scale limits are not exceeded in the future. Rework. Scheduled Completion Date: 6/30/03.
 Disposition Performance Results: Acceptable.
 Results/Comments/Supporting Information: See attached Repackaging Form (Appendix 7). "I received remedial training and corrected the Batch Data Report." - Sue Miranda 6/19/03
 Results/Comments/Supporting Information: Closed based on correction of App. 2 for Z09780 in BDR VE-2003-006. Remedial training completed on 6/19/03 (see comment above).

Comments: None

Deficiency

Date Closed

Date NCR Received

Date Identified

Responsible Organization

**NCR Number:
CRFD Assigned
Site Assignment**

By:

112
3228
ID
Idaho National Engineering and Environmental Laboratory
6/20/2003
Kenny Burnside
6/24/2003
OPEN
Title: Absence of checklist comments
Batch #: RTR03-00006.
Condition Description: Upon reviewing the batch and completing the checklist. Replicate comparison comments were not available on the ITR checklist. Cannot verify the ITR made a comparison of the Original/Replicate therefore, cannot verify the QAO for accuracy had been met.
JUNE 24, 2003 UPDATE BY QA TO ADD ADDITIONAL INFORMATION:
The above described condition was identified during performance of Level 1 QA data validation. After further investigation, it has been determined that the replicate comparison comment information had been verified during the Technical Supervisor review of the affected batch. It appears that the replicate comparison comment information was overwritten during batch promotion to the Level 1 QA review, leaving only the answers to the checklist questions. The disposition evaluation must address the underlying cause of the comment information loss. (E. Dumas 6/24/03)
MP-TRUW-8.8 rev.3 4.3.3.2.3

Requirement Violated:

MP-TRUW-8.8 rev.3 4.3.3.2.3

Actions: None described in NCR.

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

June 1, 2003 – June 30, 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 June 1, 2003 through June 30, 2003, 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 *Los Alamos National Laboratory (LANL)*, and the *Rocky Flats Environmental Technology Site (RFETS)*. The changes were approved by CBFO during June 2003.

Plan and Procedure Change Report

Start Date: 6/1/2003
End Date: 6/30/2003

CCP

Tracking # CBFO Approval Date Document Title Change Description

03-2293 6/27/2003 CCP-TP-002, R13, Draft I, CCP Reconciliation of DQOs with Reporting Characterization Data & associated forms A1 through A8 Added steps for Totals Sampling.

LANI

Tracking # CBFO Approval Date Document Title Change Description

03-2191 6/4/2003 DTP-00-053, R0, Assignment of Waste Matrix Codes (formerly TWCP-DTP-1.2-053, R1, IC1) Revised method for WMC assignment & verification; clarified NCR initiation.

03-2206 6/11/2003 PLAN-00-001, R1, Los Alamos National Laboratory Transuranic Waste Quality Assurance Project Added Entech HSG unit; clarified VE qualifications.

03-2238 6/13/2003 QP-00-010, R0, Project Level Data Validation and Verification (formerly TWCP-QP-1.1-010) Added steps for Entech HSG unit.

Plan and Procedure Change Report

Start Date: 6/1/2003
End Date: 6/30/2003

REETS

Tracking #	CBFO Approval Date	Document Title	Change Description
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03-2187	6/4/2003	4-H19-WSRIC-001, R7, WSRIC Characterization and Reverification	Clarified steps for verifying AK, waste reassessment & processing NCRs due to reassessment.
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