



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
August 25, 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 July 24, 2003 through August 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 July 1, 2003 through July 31, 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,

Chuan-Fu Wu for
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

July 24, 2003 – August 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 July 24, 2003 through August 23, 2003 there was one reportable Nonconformance Report (NCR), generated by the *Rocky Flats Environmental Technology Site* (RFETS), while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 7/24/2003

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

Earliest End Date = 8/23/2003

Deficiency

Date Closed

Date NCR Received

Date Identified

Responsible Organization

By:

NCR Number: 2003-000921	113	RF	7/23/2003	7/28/2003	7/25/2003	Item I.D. # / Description: DD1462 and DC9387 were headspace sampled on 7/10/03 as Type 3's, through rigid liner, when they should have been done as Type 1B's, Newly Generated. Location: 440 Bldg. Nonconformance Description: The drums were sampled on 7/10/03 and included in batch data report HGAS-DP-00602. This is a procedure violation (PRO-1351-440-SWB) because they were sampled by the wrong method as defined in the procedure.
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Requirement Violated: PRO-1351-440-SWB

Actions: Immediate Actions Taken: Project Level data review was stopped.

Final Disposition: The sample data is valid because the Type 3 method is more conservative than the Type 1B. Discussions have been held with headspace personnel regarding the procedure requirements for headspace sampling.

Use-As-Is. Scheduled Completion Date: 7/29/03

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

July 1, 2003 – July 31, 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 July 1, 2003 through July 31, 2003, there were twenty-one 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 *Idaho National Engineering and Environmental Laboratory*, the *Los Alamos National Laboratory (LANL)*, and the *Rocky Flats Environmental Technology Site (RFETS)*. The changes were approved by CBFO during July 2003.

Plan and Procedure Change Report

Start Date: 7/1/2003

End Date: 7/31/2003

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
03-2345	7/8/2003	All Sites - CCP-TP-001, R9, Draft I, CCP Project Level Validation and Verification	Added solids checklists; clarified roles of SPQAO & SPM at APL sites & added chks for QAOs & other criteria.
03-2629	7/29/2003	All Sites - CCP-TP-007, R17, Draft P, CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure	Clarified DAC determination for retrievably stored and newly generated waste.
03-2642	7/31/2003	SRS - CCP-TP-011, R14, Draft I, CCP Radiography Inspection Operating Procedure	Clarified steps for startup, replicate scans, & independent observations.

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
03-2358	7/9/2003	LO-090-450, RG-0, TRU Project Sample Chain of Custody, Storage, Acceptance, and Disposal	Added steps for shipping samples to an offsite analytical laboratory.

Plan and Procedure Change Report

Start Date: 7/1/2003
End Date: 7/31/2003

Tracking #	CBFO Approval Date	Document Title	Change Description
03-2360	7/9/2003	WMP-400, Section 8.1.8, R14, Data Management for Headspace Gas Sampling and Analytical Results	Added steps for managing BDRs & raw data from offsite analytical laboratories.
03-2363	7/10/2003	LA-523-410, RK-1, Determination of VOCs in TRU Mixed Waste Container Headspace	Clarified TIC reporting, BFB times, IC, ICV, CCV, lab blanks & IS acceptance criteria.
03-2390	7/16/2003	DO-080-009, R1-2, Obtain Headspace Gas Samples of TRU Waste Containers	Added steps for: using duplicate canister assemblies, sampling through the carbon filter, temperature monitoring, & DAC evaluation; clarified COC requirements.
03-2391	7/17/2003	WMP-400, Section 7.1.4, R12, Sampling Design and Data Analysis for RCRA Characterization and Visual Examination of Transuranic Waste	Clarified selection of drums for VE as QC check on RTR.
INEEL			
03-2328	7/2/2003	MCP-2610, R1, QA Program Administrative Controls for the TWCP	Clarified documentation of the NCR process.

Plan and Procedure Change Report

Start Date: 7/1/2003
End Date: 7/31/2003

03-2346	7/9/2003	ACMM-9930, R8, Analysis of Gas Samples for VOCs by GC/MS	Added carbon disulfide to TAL - Hanford
03-2348	7/9/2003	ACCM-9260, R9, Volatile Organic Compounds by Gas Chromatography Mass Spectrometry	Added additional steps for BFB tunes.
03-2347	7/9/2003	ACMM-9500, R8, Sample Preparation for Semivolatle Organic Compounds and Polychlorinated Biphenyls	Clarified process for SVOC extraction.
03-2361	7/9/2003	ACLP-4.40, R5, SUMMA Canister Cleaning	Added carbon disulfide to TAL - Hanford.



Tracking #	CBFO Approval Date	Document Title	Change Description
03-2377	7/15/2003	DTP-00-071, R0/IC2, Manual Headspace Gas Sampling of LANL TRU Waste Containers	Clarified proper handling and transportation of samples.

Plan and Procedure Change Report

Start Date: 7/1/2003
End Date: 7/31/2003

03-2378	7/15/2003	TWCP-DTP-1.2-069, R0/IC2, Installation of the NucFil HGAS Sample Port	Clarified proper pressure for sample port installation.
03-2610	7/22/2003	DTP-00-072, R0, IC2, LANL TRU Waste Container HGAS Analysis (Entech/Agilent)	Added steps for taking equipment blanks and field reference samples for new Summa canisters; clarified BFB tunes & holding temperature for samples.



Tracking #	CBFO Approval Date	Document Title	Change Description
03-2315	7/2/2003	PRO-940-WIPP-010, R19, TRU Waste Characterization Project Level Data Review and Reporting	Added steps to perform validation on VOC analysis for solids done by INBEL TWCP.
03-2278	7/2/2003	95-QAPJP-0050, R7, Rocky Flats Environmental Technology Site TRU Waste Characterization Program Quality Assurance Project Plan	Added provisions for offsite solids S&A; removed req. to analyze for PCBs, but added note: ship after NMED approval.
03-2330	7/2/2003	PRO-1585-PWS-440, R0, DCF-CHG-01, Polymerized Waste Sampling	Clarified process for taking the initial sample.

Plan and Procedure Change Report

Start Date: 7/1/2003

End Date: 7/31/2003

ID	Date	Description	Notes
03-2386	7/16/2003	PRO-484-WIPP-003, R5, Collection, Review, and Confirmation of Acceptable Knowledge Documentation	Clarified reporting of discrepancies in AK found during verification & changes to WMCs; added 85-gallon drums & TDOPs.
03-2633	7/30/2003	PRO-1351-440-SWB, R2, Room 113, Perma-Con Operations	Clarified steps for ensuring the rigid liner is properly vented.