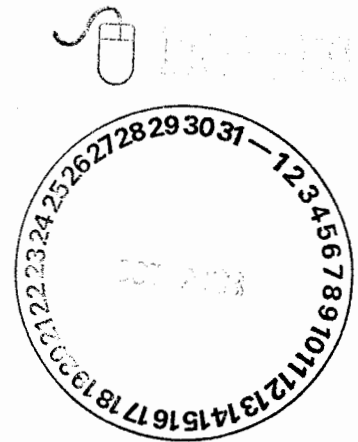




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 October 24, 2003



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

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 CBFO during the period of September 24, 2003 through October 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 September 1, 2003 through September 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,

Inés Triay
 Dr. Inés R. Triay
 Manager

Enclosure

cc: w/o enclosure
 A. Holland, CBFO *ED
 J. Kieling, NMED *ED
 J. Bearzi, NMED *ED



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
September 24, 2003 – October 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 September 24, 2003 through October 23, 2003, there were five reportable Nonconformance Reports (NCRs), generated by the *Rocky Flats Environmental Technology Site (RFETS)*, the *Central Characterization Project at the Savannah River Site (CCP/SRS)*, 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 = 9/24/2003

Earliest End Date = 10/23/2003

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

<u>NCR Number:</u> <u>CBFO Assigned</u>	<u>Responsible</u> <u>Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR</u> <u>Received</u>	<u>Date Closed</u>	<u>Deficiency</u>																						
114 2003-001046	RF Rocky Flats Environmental Technology Site	10/3/2003 R.A. Eschenbaum	10/8/2003	10/7/2003	<p>Item I.D. # / Description: CAP 2003-000815 was written for drums that did not have the rigid liner previously vented and were not being adequately vented as part of the headspace gas sampling process. The applicable headspace data is not valid for the drums.</p> <p>Location: Site</p> <p>Nonconformance Description: The drum headspace data is not valid and was being managed through the CAP but some of the drums (see below) are the sample duplicates in the headspace batch reports.</p> <p>Affected Drums and Data Packages:</p> <table border="0"> <tr> <td>HVOC Data Pkg:</td> <td>Number:</td> </tr> <tr> <td>HGAS-DP-00222</td> <td>D86278</td> </tr> <tr> <td>HGAS-DP-00301</td> <td>D73115</td> </tr> <tr> <td>HGAS-DP-00320</td> <td>D89845</td> </tr> <tr> <td>HGAS-DP-00324</td> <td>D94182</td> </tr> <tr> <td>HGAS-DP-00343</td> <td>D70452</td> </tr> <tr> <td>HGAS-DP-00349</td> <td>D65828</td> </tr> <tr> <td>HGAS-DP-00360</td> <td>D71964</td> </tr> <tr> <td>HGAS-DP-00382</td> <td>D87042</td> </tr> <tr> <td>HGAS-DP-00441</td> <td>D73013</td> </tr> <tr> <td>HGAS-DP-00442</td> <td>D89345</td> </tr> </table>	HVOC Data Pkg:	Number:	HGAS-DP-00222	D86278	HGAS-DP-00301	D73115	HGAS-DP-00320	D89845	HGAS-DP-00324	D94182	HGAS-DP-00343	D70452	HGAS-DP-00349	D65828	HGAS-DP-00360	D71964	HGAS-DP-00382	D87042	HGAS-DP-00441	D73013	HGAS-DP-00442	D89345
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<p>Requirement Violated: CAP 2003-000815</p> <p>Actions: Immediate Actions Taken: See CAP for actions. Final Disposition: Evaluate and annotate use of OCS/OCSD in place of sample/sample duplicate to meet precision QAO in data package. Rework. Scheduled Completion Date: 12/1/03 Results/Comments/Supporting Information: Data generation level QAO checklists were annotated. Closure Results/Comments/Supporting Information: Sample/sample duplicate data was voided and OCS/OCSD was determined to meet precision QAO. PQAQ or designee will verify this NCR has been added to each affected BDR during Project Level Validation IAW WIPP-010.</p> <p>Comments: Trend Code(s): WST-PER54</p>																											

115 2003-001044	RF Rocky Flats Environmental Technology Site	10/3/2003 R.J. Ballenger	10/8/2003	10/7/2003	<p>Item I.D. # / Description: Headspace data is invalid for containers that were headspaced as other than as a Type 3 (through the rigid liner) when overpacked in a 85-gallon drum due to 55-gallon drum integrity issues.</p> <p>Location: Site</p> <p>Nonconformance Description: Containers that had integrity issues could have been 'leaking' during the actual headspace sampling and air could have been diluting the samples. Drums that were sampled through the rigid liner did not have this concern. The list of affected containers and the headspace data packages follow:</p> <p>List of Affected Containers and Data Package Number</p> <table border="0"> <thead> <tr> <th>Drum</th> <th>Overpack</th> <th>Data Package</th> </tr> </thead> <tbody> <tr> <td>D68481</td> <td>O01261</td> <td>HGAS-DP-00501</td> </tr> <tr> <td>D68489</td> <td>O01141</td> <td>HGAS-DP-00525</td> </tr> <tr> <td>D70193</td> <td>O01084</td> <td>HGAS-DP-00528</td> </tr> <tr> <td>D70195</td> <td>O01379</td> <td>HGAS-DP-00525</td> </tr> <tr> <td>D70210</td> <td>O01213</td> <td>HGAS-DP-00529</td> </tr> </tbody> </table>	Drum	Overpack	Data Package	D68481	O01261	HGAS-DP-00501	D68489	O01141	HGAS-DP-00525	D70193	O01084	HGAS-DP-00528	D70195	O01379	HGAS-DP-00525	D70210	O01213	HGAS-DP-00529
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<u>NCR Number:</u> <u>CBFO Assigned</u> <u>Site Assigned:</u>	<u>Responsible</u> <u>Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR</u> <u>Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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D70418	O01088	HGAS-DP-00525
D70424	O01380	HGAS-DP-00525
D70842	O01289	HGAS-DP-00525
D76791	O01217	HGAS-DP-00525

Requirement Violated: WAP B1-1a(6)(I)

Actions: Immediate Actions Taken: NA – Type 3 sampling through the unvented rigid liner of 55-gallon drums in overpacks are the only overpacks being done at this time.
Final Disposition: Scrap the headspace data for the affected drums. Scrap.
Scheduled Completion Date: 10/30/03
Disposition Performance Results: Acceptable
Closure Results/Comments/Supporting Information: Closed based on a review to ensure the headspace data for all affected drums were scrapped in each BDR. Refer to Pg. 2 of 2 for drum and BDR numbers.

Comments: Trend Code(s): WST-EQP44

116	CS	10/7/2003	10/7/2003	OPEN	RTR I. O. was obtained on 9/2/03 and replicate on 9/3/2003 for a batch that was run on 9/2/2003 through 9/3/2003. The same QC was used on two other batches run 9/3/2003.
NCR-SRS-0543-03	Savannah River Site / CCP	Adela Cantu (project level V&V)			

Requirement Violated: IO and replicate are required once per batch or once per day, whichever is less.

Actions: Reject the two batches run on 9/3/2003 and re-run using good QC.

Comments: None

117	CS	10/7/2003	10/7/2003	OPEN	Wrong procedure revision used on two BDRs.
NCR-SRS-0543-03	Savannah River Site / CCP	Adela Cantu (project level V&V)			

Requirement Violated: Must use controlled procedures.

Actions: Evaluate changes between Revision 13 and 14 to determine if changes to Revision 14 impact data.

Comments: None

118	ID	10/7/2003	10/9/2003	OPEN	Miscalculation of SPCC Response Factors Batch # HSG03-00208, 209, 211, 213, 214 Condition Description: INST-01-13, Rev. 11 required calculation of the response factors (RF) of system performance check compounds (SPCC) according to EPA SW-846 8260B every continuing calibration verification (CCV). The response factor is found as $RF = (As * Cis) / (Ais * Cs)$ where 's' denotes the SPCC, 'is' denotes the nearest standard, 'A' denotes the measured peak area, and 'C' denotes the known concentration. The SPCC RF is reported in the HSG Analytical Batch Data Report on page 10 of the AMWTP Form-1433 Rev. 2, Continuing Calibration Verification Form.
3596	Idaho National Engineering and Environmental Laboratory	Scott Riley			In the affected batches, SPCC RF was miscalculated using the average internal standard area from the initial calibration rather than the measured area in the CCV analysis. Furthermore, the measured concentration rather than the known concentration of the SPCC was used.

<u>NCR Number:</u> <u>CBFO Assigned</u> <u>Site Assigned:</u>	<u>Responsible</u> <u>Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR</u> <u>Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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Affected batches include the following:
HSG03-00208
HSG03-00209
HSG03-00211
HSG03-00213
HSG03-00214

Batches 208, 209, and 211 have been through SPM review.

QA MANAGER REVIEW UPDATE:
The calculation was incorrectly designed in the software. This error was not revealed when the calculation was validated, since the validation only confirmed the results, and not the calculation input values.

This NCR requires CBFO Notification since the data for the first three batch reports had been released by the SQAO to the SPM for review.

Requirement Violated: INST-01-13, Proper calculation of SPCC RF per EPA SW-846 8260B

Actions: Disposition: Rework; Responsible Manager: Scott Riley; No Stop Work; No CAR required; Date Due: 10/13/03 6:00 PM.
Disposition Description/CAP: The fact that this miscalculation was not caught and corrected during the original Level 1 validation of these batches is a result of the same issue already addressed in NCR 3406, "%RSD Calculation Error"; namely, sufficient spot-checks of the calculations were not performed as required by INST-TRUW-8.8. Because this error occurred concurrently with that of NCR 3406, and because training addressing Level 1 validation and independent technical review has been performed per NCR 3406 corrective actions, no further training is recommended in this disposition. This error does not affect any batches other than the five listed above since monitoring of SPCCs is not required by INST-01-13 Rev. 14. The calculation of SPCCs is set to be removed from the "Ex-BDR Program.xls" program per SCR 255.

Corrective Actions:
(1) SPCC RF for the affective batches shall be correctly calculated and reported in the "Form 7a" AMWTP Form 1433 batch data report forms.
(2) The hand- or type-written calculations shall be included in the BDRs accompanying the corrected "Form 7a" AMWTP Form 1433 forms
(3) This NCR shall be added to the affected batches and described in the Case Narrative.

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

September 1, 2003 – September 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 September 1, 2003 through September 30, 2003, there were seven 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 September 2003.

Plan and Procedure Change Report

Start Date: 9/1/2003

End Date: 9/30/2003

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3053	9/3/2003	CCP-TP-003, R14, Draft D, CCP Sampling Design and Data Analysis for RCRA Characterization	Clarified recalculation of the mean & standard deviation; clarified establishment of PRQLs.
03-3231	9/25/2003	CCP Forms CCP-TP-002-A3, A5, A6, A7, A8	Forms A6 & A7 - Changed TIC concentration units from ppmv to mg/kg.
03-3228	9/25/2003	CCP-TP-029, R12, Draft G, CCP Single Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration	Clarified %RSD criteria and TIC reporting; added Carbon Disulfide and Chloromethane to the TAL.

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3078	9/15/2003	FSP-PFP-5-8, Section 16.2, R7, Data Management	Added solid sampling data management.

Plan and Procedure Change Report

Start Date: 9/1/2003

End Date: 9/30/2003

03-2661

9/18/2003

WRP1-OP-0908, R. G-8, Operation of the Drum
Nondestructive Examination System

Added step to ensure 360 degree rotation of drum;
clarified prohibited item verification, independent
observations, & replicate scans.

LANL

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3058	9/8/2003	DTP-00-074, R.0, Manual Headspace Gas Sampling of LANL TRU Waste Containers for Analysis by INEEL (formerly TWCP-DTP-1.2-074, R.2/IC2)	Clarified equilibrium pressure for HSG canisters; clarified DAC calculations.

REETS

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3070	9/8/2003	PRO-940-WIPP-010, R19, DCF-CHG-01, WIPP TRU Waste Characterization Project Level Data Review and Reporting	Appendix 14 - Added step to ensure that RTR-related NCRs are closed for pre-WAP BDRs.
