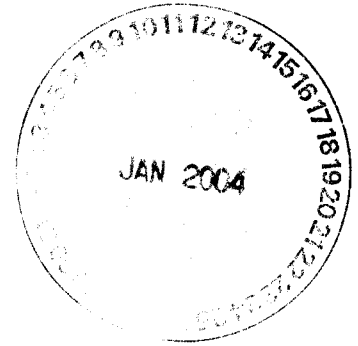




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
January 7, 2004



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 November 24, 2003 through December 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 November 1, 2003 through November 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
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

November 24, 2003 – December 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 November 24, 2003 through December 23, 2003, there were three reportable Nonconformance Reports (NCRs), generated by the *Central Characterization Project* at the *Savannah River Site* (CS), while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 11/24/2003

Earliest End Date = 12/23/2003

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

<u>NCR Number:</u> <u>CBFD 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>
119 NCR-SRS-0553-03	CS Savannah River Site / CCP	12/18/2003 Larry Porter	12/18/2003	OPEN	<p>The DAC used to establish the sampling date did not use the default packaging configuration #3, but was based on packaging configuration #2 as supplied on drum data sheets submitted by SRS to records. The default DAC is 46 days (packaging configuration #3) whereas the DAC for packaging configuration #2 is 30 days. After identification of the need to use the default DAC, a review of the sampling dates identified drums that did not meet 46 days and drums reported with incorrect data AND the listed 6 drums were emplaced at WIPP.</p> <p>Requirement Violated: CCP-PO-001 B1-1a(3) General Requirements The determination of packaging configuration consists of identifying the number of confinement layers and the identification of rigid poly liners when present. CCP will use either the default conditions specified in Tables B1-7 through B1-10 for retrievably stored waste or the data documented during packaging (Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][iii]) for determining the appropriate DAC for each container from which a headspace gas sample is collected.</p> <p>Actions: 1. Place drums listed on Attachment 1 as "Reject" in P-TS. 2. Identify which drums have been identified in Lots for certification and/or shipped to WIPP for disposal. NOTE: Pending completion of item # 2 above, identify other actions.</p> <p>Comments: None</p>
120 NCR-SRS-0554-03	CS Savannah River Site / CCP	12/18/2003 Larry Porter	12/18/2003	OPEN	<p>The DAC used to establish the sampling date did not use the default packaging configuration #3, but was based on packaging configuration #2 as supplied on drum data sheets submitted by SRS to records. The default DAC is 46 days (packaging configuration #3) whereas the DAC for packaging configuration #2 is 30 days. After identification of the need to use the default DAC, a review of the sampling dates identified drums that did not meet 46 days.</p> <p>Requirement Violated: CCP-PO-001 B1-1a(3) General Requirements The determination of packaging configuration consists of identifying the number of confinement layers and the identification of rigid poly liners when present. CCP will use either the default conditions specified in Tables B1-7 through B1-10 for retrievably stored waste or the data documented during packaging (Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]) for determining the appropriate DAC for each container from which a headspace gas sample is collected.</p> <p>Actions: Place drums as "Reject" in P-TS; Resample drums.</p> <p>Comments: None</p>
121 NCR-SRS-0555-03	CS Savannah River Site / CCP	12/18/2003 Larry Porter	12/18/2003	OPEN	<p>The DAC used to establish the sampling date did not use the default packaging configuration #3, but was based on packaging configuration #2 as supplied on drum data sheets submitted by SRS to records. The default DAC is 46 days (packaging configuration #3) whereas the DAC for packaging configuration #2 is 30 days. After identification of the need to use the default DAC, a review of the sampling dates identified drums that did meet 46 days, but the data was incorrectly identified.</p> <p>Requirement Violated: CCP-PO-001 B1-1a(3) General Requirements The determination of packaging configuration consists of identifying the number of confinement layers and the identification of rigid poly liners when present. CCP will use either the default conditions specified in Tables B1-7 through B1-10 for retrievably stored waste or the data documented during packaging (Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][iii]) for determining the appropriate DAC for each container from which a headspace gas sample is collected.</p> <p>Actions: Data has been re-evaluated and meets the 46 day DAC criteria for Scenario 3, Packaging Configuration 3, Liner No</p>

NCR Number: CBFO Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	<u>Deficiency</u>
------------------------------	-----------------------------	-----------------	----------------------	-------------	-------------------

Site Assigned:

By:

lid. Place acceptance letter, and NCR with each BDR.

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

November 1, 2003 – November 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 November 1, 2003 through November 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 *Idaho National Engineering and Environmental Laboratory (INEEL)*, and the *Rocky Flats Environmental Technology Site (RFETS)*. The changes were approved by CBFO during November 2003.

Plan and Procedure Change Report

Start Date: 11/1/2003

End Date: 11/30/2003

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3383	11/18/2003	CCP-TP-005, R13, Draft E, CCP Acceptable Knowledge Documentation (& assoc. forms CCP-TP-005-A1, R0, DA and CCP-TP-005-A2, R0, DA)	Added steps for updating the AK Summary; clarified the process for AK documentation.

ACMM

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3395	11/25/2003	ACMM-9500, R8, MCR 5-393, Sample Preparation for Semivolatile Organic Compounds and Polychlorinated Biphenyls	Temporary change - Added steps for SVOC sample extractions for high radionuclide content cores.

RS

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3358	11/4/2003	RS-012-004, Version 4, Grid Method - Solid Sampling and Analysis Plan	Updated to current WAP language - removed PCP prohibition; clarified control charting for repackaged waste and clarified soil/gravel sampling.

Plan and Procedure Change Report

Start Date: 11/1/2003

End Date: 11/30/2003

03-3361	11/5/2003	PRO-1676-HGAS-S&A, V1, Headspace Gas Sampling and Analysis Using an On-Line Integrated System	Clarified HSG sampling of SWBs; added steps for online BFB tunes, CCAL, OCS, canister certs, field blanks, and canister samples.
03-3375	11/14/2003	PRO-1351-440-SWB, V3, Room 113 Perma-Con Operations	Added steps for sampling overpacks for HSG.