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,

Inés R. Triay  
Manager  

Enclosure

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

*ED denotes electronic distribution

CBFO:QA:ALH:GS:04-0005:UFC 2300.00
MONTHLY SUMMARIZATION REPORT

FOR

SITE-GENERATED NONCONFORMANCE REPORTS


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.
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.

**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.

**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.

**Comments:** None

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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.

**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.

**Actions:** Place drums as "Reject" in P-TS; Resample drums.

**Comments:** None
<table>
<thead>
<tr>
<th>NCR Number:</th>
<th>Responsible Organization</th>
<th>Date Identified</th>
<th>Date NCR Received</th>
<th>Date Closed</th>
<th>Deficiency</th>
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<tbody>
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</tbody>
</table>

By: 

Date of this report: Monday, January 05, 2004

Comments: None

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

<table>
<thead>
<tr>
<th>Tracking #</th>
<th>CBFO Approval Date</th>
<th>Document Title</th>
<th>Change Description</th>
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<tr>
<td>03-3383</td>
<td>11/18/2003</td>
<td>CCP-TP-005, R13, Draft E, CCP Acceptable Knowledge Documentation ( &amp; assoc. forms CCP-TP-005-A1, R0, DA and CCP-TP-005-A2, R0, DA)</td>
<td>Added steps for updating the AK Summary; clarified the process for AK documentation.</td>
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Monday, December 15, 2003  
Page 1 of 2
<table>
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<tr>
<th>Plan and Procedure Change Report</th>
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<tr>
<td></td>
<td><strong>03-3361</strong> 11/5/2003</td>
<td>PRO-1676-HGAS-S&amp;A, V1, Headspace Gas Sampling and Analysis Using an On-Line Integrated System</td>
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<td></td>
<td><strong>03-3375</strong> 11/14/2003</td>
<td>PRO-1351-440-SWB, V3, Room 113 Perma-Con Operations</td>
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