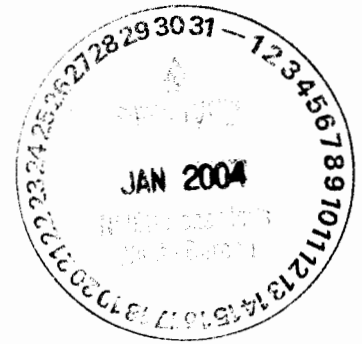




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221



January 28, 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 Nonconformance Report (NCR) Summarization Report. The NCR Summarization Report lists site-generated NCRs received at CBFO during the period of December 24, 2003 through January 23, 2004. 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 December 1, 2003 through December 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 at (505) 234-7423.

Sincerely,

R. Paul Detwiler
Acting Manager

Enclosure

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



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
December 24, 2003 – January 23, 2004

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 December 24, 2003 through January 23, 2004, 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 = 12/24/2003

Earliest End Date = 1/23/2004

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

<u>NCR Number:</u> <u>CRFO 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>
122 2004-000009	RF Rocky Flats Environmental Technology Site	1/8/2004 Gene Krupp	1/9/2004	1/9/2004	<p>Description: D67965 was headspaced on 1/4/01 as a Type 6 which is for no rigid liner. Location: 440 Bldg. Nonconformance Description: Drum was RTR'd on 1/21/01 and does have a rigid liner, therefore, the headspace sampling was not done correctly.</p> <p>Requirement Violated: PRO-1351-440-SWB</p> <p>Actions: Immediate Actions Taken: WIPP Verify did not finish. Final Disposition: Scrap data from HVOC-DP-00421, GMSP-DP-00736 and in WEMS. The data for this container will still be acceptable for satisfying HGAS quality control requirements if it was used for this purpose. Scrap. Scheduled completion date: 1/15/04. Disposition Performance Results: Acceptable. Results/Comments/Supporting Information: D67965 headspace gas analytical results have been deleted from WEMS and Batch Data Reports GMSP-DP-00736 and HVOC-DP-00421. Closure: Headspace gas data for D67965 have been deleted from WEMS and scrapped in BDRs HVOC-DP-00421 and GMSP-DP-00736. See WEMS "Samples" form and BDRs. Trend Code: WST-PER54 Final QA Review By: John Tressell, 1/9/04.</p> <p>Comments: None</p>

PLAN AND PROCEDURE CHANGE REPORT

December 1, 2003 – December 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 December 1, 2003 through December 31, 2003, there were nine 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 (INEEL) Labs*, and the *Rocky Flats Environmental Technology Site (RFETS)*. The changes were approved by CBFO during December 2003.

Plan and Procedure Change Report

Start Date: 12/1/2003
End Date: 12/31/2003

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3503	12/1/2003	CCP-TP-032, R11, Draft N, CCP Single Sample Manifold Data Validation Procedure	Added carbon disulfide & chloromethane to Target Analyte List; added steps to Independent Technical Review checklist to verify data flags & Relative Retention Time criteria; changed VOC RSD% to <35; clarified Online Control Sample/drum duplicates, sampling QAOs.

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3501	12/2/2003	WMP-400, Section 7.1.9, R15, Acceptable Knowledge Documentation Management	Clarified language regarding containers > 4 liters.
03-3508	12/2/2003	WMP-400, Section 7.1.3, R4, Transuranic Waste Repackaging, Visual Examination, and Sampling	Clarified language regarding drum liners and sample holding times.
03-3536	12/12/2003	LA-523-410, RL-0, Determination of Volatile Organic Compounds in TRU/Mixed Waste Container Headspace	Added 3rd GC/MS system; clarified use of B flag; added steps for creating and using an automated sample acquisition method.

Plan and Procedure Change Report

Start Date: 12/1/2003
End Date: 12/31/2003

03-3541	12/15/2003	WRP1-OP-729, RB-6, Visual Examination	Added heat sealed bags to closure methods; clarified language containers >4 liters; clarified steps for ensuring weighing precision; added items to drum log for Waste Matrix Code and Nonconformance Report.
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INEEL Labs

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3515	12/8/2003	ACMM-9500, R8, MCR 5-394, Sample Preparation for Semivolatile Organic Compounds and Polychlorinated Biphenyls	Added steps for SVOC sample extractions for high radionuclide content cores.

RFETS

Tracking #	CBFO Approval Date	Document Title	Change Description
03-3525	12/10/2003	PRO-1358-440-VERP, V3, Glovebox and C-Cell Waste Operations	Clarified steps for drum venting; added steps for VE of overpacks; added steps for reduced VE of qualifying waste streams.
03-3547	12/18/2003	PRO-1676-HGAS-S&A, V2, Headspace Gas Sampling and Analysis Using an On-Line Integrated System	Changed steps to allow taking the sample and sample duplicate simultaneously.

Plan and Procedure Change Report

Start Date: 12/1/2003

End Date: 12/31/2003

03-3562

12/30/2003

95-WP/SAP-001, V11, Transuranic (TRU/TRM)
Waste Sampling Plan

Clarified waste stream delineation using IDCs; added clarification for control charting, RTR in lieu of VE for retrievably-stored waste characterized as newly generated; added use of INEEL Labs for Solid Sampling&Analysis.