



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 1, 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 report lists site-generated Nonconformance Reports (NCRs) received at CBFO during the period of January 24, 2004 through February 23, 2004. It is transmitted pursuant to 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 report lists document changes that affect performance criteria or data quality and that were approved by CBFO during the period of January 1, 2004 through January 31, 2004. This report is transmitted pursuant to 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,

R. Paul Detwiler
Acting Manager

Enclosure

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



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
January 24, 2004 – February 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 January 24, 2004 through February 23, 2004, there were four reportable Nonconformance Reports (NCRs), generated by the *Los Alamos National Laboratory (LANL)*, the *Rocky Flats Environmental Technology Site (RFETS)*, and the *Central Characterization Project at the Savannah River Site (CCP/SRS)*, while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 1/24/2004

Earliest End Date = 2/23/2004

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

NCR Number: CBFO Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
Site Assignment:	By:				
123 NCR-04-001	LA Los Alamos National Laboratory	1/13/2004 Mavis Lin	1/27/2004	OPEN	The NCR is written for the discrepancies identified during annual miscertification rate evaluation in the gross weights of RTR and VE for container 55167. The RTR gross weight is reported as 55.6 Kg (122.9 lbs). LA02-RTR-071, TWCP-11671. The VE gross weight is reported as 99.4 lbs, LA03-VE-028. The gross weight found on the TRU Waste Management System is 94.0 lbs. Both RTR and VE characterization data confirm the AK waste stream description, TA-55-19, debris waste. Requirement Violated: DTP-00-001 and DTP-00-008 Actions: Disposition: RTR to supercede LA02-RTR-071 BDR with new weight from VE for drum 55167. Person/operation assigned corrective action: Jack Vigil. Expected completion date: 1/27/04. Comments: None
124 2004-000072	RF Rocky Flats Environmental Technology Site	2/6/2004 C.A. Turner	2/10/2004	2/9/2004	Item I.D. # / Description: A target analyte was reported as Tentatively Identified Compound (TIC) for Batch Data Report RIN 03W0065. Nonconformance Description: For SWB S01017, the compound, 1,1,1,-Trichloroethane, should have been reported as a hit (150 ppmv) rather than a TIC (160 ppmv). Location: B440 Requirement Violated: WIPP Hazardous Waste Permit Waste Analysis Plan, Table B3-2. Actions: Immediate Actions Taken: None. Validation: Significance Lvl/Minor; Operability Eval Required/No; Generic Implications/No; Responsible Manager (RM)/C. A. Turner, 2/6/04. Final Disposition: Normally when an analysis shows a TIC, it is evaluated to see if it is a target analyte and if it is above the MDL. If the compound is a target analyte and above the MDL then the target analyte is reported on the Form 1A. If the compound is a target analyte and below the MDL it is not reported. The Batch Data Report was appended to correct this oversight. Rework. Scheduled Completion Date: 2-6-04. Proposed By: C. A. Turner, 2-6-04; Design Authority Concurrence: C. A. Turner, 2-6-04; QA Concurrence: C. L. Ferrera, 2/9/04; WRG Concurrence: Not Applicable; RM Approval: C. A. Turner, 2-6-04. Disposition Performance Results: Acceptable. Results Verified By: E. L. D'Amico, 2/9/04. Closure (Results/Comments/Supporting Information): BDR HGAS-DP-00426 (RIN 03W0065) was appended to report the compound as a target analyte on Form 1A. Final QA Review By: John Tressell, 2/10/04. Comments: None
125 NCR-SRS- 0513-04, Rev. 0	CS Savannah River Site / CCP	2/10/2004 Karen A. Day	2/12/2004	2/12/2004	Process: NDE; Batch Data Report #s: SRRTR0745, SRRTR0868, SRRTR0885; Drum #s: SR234918, SR235185, FBL01063, SR611742; Hold Tag Applied: Yes; Segregation Method: N/A Description of Nonconformance: Required Condition (Implementing Procedure, Section & Revision) CCP-PO-001, Revision 7, Section B1-3b(2), discusses the Waste Analysis Plan requirements for on-the-job RTR operator training and states the following: "To qualify, candidate radiographers must successfully analyze a radiography test drum initially (prior to analyzing drums in a particular waste stream for disposal characterization) and at least biannually thereafter. The test drum includes items common to the waste streams and representative of the waste matrix code to be characterized by CCP." Actual Condition: To date, RTR operator training has not involved identification of test drums containing S3113 waste, which is a homogenous waste matrix code. RTR has been conducted on four drums designated by AK as S3113 waste based on the following BDRs: SRRTR0745: Drums SR234918 and SR235185

<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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SRRT0868: Drum FBL01063
SRRT0885: Drum SR611742

At this time, SRS is not authorized to characterize and ship homogenous waste forms (S3000 series).

Requirement Violated: CCP-PO-001, Revision 7, Section B1-3b(2)

Actions: Interim Disposition: N/A
Final Disposition: Reject. Dispositioned to SRS. S3000 drums have been removed from the AK Tracking Spreadsheet. NCR closed on 2/12/04.

Comments: None

126	RF	2/12/2004	2/17/2004	2/12/2004	WIPP-related: Yes. Item I.D. # / Description: Visual Verification Batch Data Report VV-776-00008 Location: B777 Nonconformance Description: An individual (T. R. Foust) signed as the originator for DD1385 on 3/18/02 and as the validator for DD1374 on 3/15/02 when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan (TIP). The individual was restricted for not having completed the TWCP Indoctrination (TIP Code A).
2004-000091, Rev. 0	Rocky Flats Environmental Technology Site	C.L. Ferrera			

Requirement Violated: DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2

Actions: Immediate Actions Taken: None.
Significance Level: Low. Operability Eval Required: No. Generic Implications: Yes.
Final Disposition: This nonconformance was regarding a training restriction for not having completed the TWCP Indoctrination video. The individual had completed the Visual Verification qualification and all other training specified in the TIP. The training deficiency did not affect the physical accuracy of the two waste packages, because in both cases the associated originator or validator was fully compliant with the TIP.
Review of NCR Disposition: Visual Verification Technical Supervisor (TS)/ Quality Assurance Officer: Lee Gorman, 2/12/04
Use-As-Is. Scheduled Completion Date: 2/20/04
Disposition Performance Results: Acceptable; Results verified by Leslie A. Lewis, 2/12/04. Closed based on technical justification for "Use-As-Is" disposition. Trend Code WST-TRA10. Final QA Review by John Tressell, 2/12/04.

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

January 1, 2004 – January 31, 2004

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 January 1, 2004 through January 31, 2004, there were three reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Los Alamos National Laboratory* (LANL) and the *Rocky Flats Environmental Technology Site* (RFETS). The changes were approved by CBFO during January 2004.

Plan and Procedure Change Report

Start Date: 1/1/2004

End Date: 1/31/2004

LANL

Tracking #	CBFO Approval Date	Document Title	Change Description
04-0259	1/29/2004	DTP-00-024, R0, DQO Reconciliation and Characterization Data Reporting	Added steps for reporting solids/soils analysis results.

RFETS

Tracking #	CBFO Approval Date	Document Title	Change Description
04-0228	1/15/2004	PRO-945-WIPP-009, V7, RCRA Characterization of TRU Waste to be Disposed of at WIPP	Clarified that sampling requirements for newly generated S4000 wastes will follow those for retrievably stored wastes; clarified control charting; removed PCB analysis requirement for S3220.
04-0227	1/21/2004	4-G83-WEM-1209, V10, WEMS Waste Package Verification and Certification	Added steps for using INEEL TWCP methods for solids analysis.