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 February 24 through March 23, 2004. It is transmitted pursuant to the requirements 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 that were approved by CBFO during the period of February 1 through February 29, 2004. It 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,

[Signature]

R. Paul Detwiler
Acting Manager

Enclosure

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

*ED denotes electronic distribution
CBFO:QA:ALH:GS:04-0076:UFC 2300.00
MONTHLY SUMMARIZATION REPORT

FOR

SITE-GENERATED NONCONFORMANCE REPORTS

February 24, 2004 – March 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 (DOOs).

During the period of February 24 through March 23, 2004, there were five reportable Nonconformance Reports (NCRs), 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 =** 2/24/2004  
**Earliest End Date =** 3/23/2004

<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>
</tr>
</thead>
</table>
Location: 440 Bldg.  
Nonconformance Description: The operator's qualifications had not been completed. He had not completed the WAP Indoc (TIP Code A-1). This lapse in qualification was not identified until 3/24/04. During this time period, the operator performed headspace gas sampling on 36 drums as identified in Attachment 1, signing the Appendix 5, WIPP Sample Drum Log as recorder or verifier. |
| 2004-000176 | Rocky Flats Environmental Technology Site | Ed McCarthy |

**Requirement Violated:** PRO-1351-440-SWB

**Actions:** Immediate Actions Taken: Operator was stopped from further sampling until requalified.
Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager: Jeanne Poling, Signature Date 3/18/04)  
Final Disposition: This nonconformance was regarding a training restriction for not having viewed the WAP Indoc (TIP Code A-1). This lapse in qualification was not identified until 3/24/04. During this time period, the operator performed headspace gas sampling on 36 drums as identified in Attachment 1, signing the Appendix 5, WIPP Sample Drum Log as recorder or verifier.  
Nonconformance Summary: The other member of the recorder/verifier pair had completed their training. Therefore, the training deficiency did not affect the quality of the data and the headspace data is useable as is.
Review of NCR Disposition: Visual Verification Technical Supervisor (TS)/Quality Assurance Officer (Name: Daniel L. Stewart; Signature Date: 3/18/04)  
Use-As-Is; Scheduled Completion Date: 3/19/04  
Disposal Performance Results: Acceptable.

**Comments:** Item I.D. # / Description: List of affected drums and their associated batch data reports provided by site as Attachment; for inclusion in WIPP Operating Record.

Item I.D. # / Description: List of Residue Visual Batch Data Reports provided by site as Attachment; for inclusion in Operating Record  
Location: B371  
Nonconformance Description: An individual signed on inner can data sheets when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individual was restricted for not having completed the WAP Indoc (TIP Code A-2). |
| 2004-000177 | Rocky Flats Environmental Technology Site | RA Eschenbaum |

**Requirement Violated:** DOE/CBFQ-94-1012, Quality Assurance Program Document, Section 1.2; WIPP Hazardous Waste Permit WAP Section B3-14.

**Actions:** Immediate Actions Taken: None; profile not approved for shipping.
Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager: GA O'Leary, Signature Date 3/16/04)  
Final Disposition: This nonconformance was regarding a training restriction for J. Hale for not having viewed the WAP Indoc (TIP Code A-1). J. Hale signed as operator or verifier for packaging residues. The individual had completed the Residue Verification training qualification that covered the Quality Assurance Objectives applicable to Visual Verification, whereas the WAP video tape is more general and does not contain specific information on the Residue Verification process. The other member of the operator/verifier pair had completed their training. Therefore, the training deficiencies did not affect the quality of the data since the individual was trained on WAP Requirements applicable to their role in the Residue Visual Verification process and the data are acceptable as is.
Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer (Name: Daniel L. Stewart; Signature Date 3/17/04)  
Use-As-Is; Scheduled Completion Date: 3/19/04

**Date of this report:** Tuesday, March 23, 2004
<table>
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<tr>
<th>NCR Number: 129</th>
<th>Responsible Organization</th>
<th>Data Identified</th>
<th>Date NCR Received</th>
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<tbody>
<tr>
<td>2004-000178</td>
<td>Rocky Flats Environmental Technology Site RA Eschenbaum</td>
<td>3/16/2004</td>
<td>3/19/2004</td>
<td>3/18/2004</td>
<td>WIPP Related; Yes Location: B371 Nonconformance Description: Two individuals signed on inner can data sheets when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. One individual was restricted for not having completed the WAP Indoc (TIP Code A-2). The other individual signed for the cans shown on the attached list as SME. Requirement Violated: DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2; WIPP Hazardous Waste Permit WAP Section B3-14. Actions: Immediate Actions Taken: None; profile not approved for shipping. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager: G.A. O'Leary, Signature Date 3/16/04). Final Disposition: This nonconformance was regarding two training restrictions, one for J. Hale for not having viewed the WAP Indoc video and one for D. Dustin for not having read two solid sampling procedures and the Salt Process Control Plan. J. Hale signed as operator or verifier for packaging residues. This individual had completed the Residue Verification training qualification that covered the Quality Assurance Objectives applicable to Visual Verification, whereas the WAF video tape is more general and does not contain specific information on the Residue Verification process. The other member of the operator/verifier pair was fully trained. D. Dustin signed as SME for packaging down-blended oxides and heavy metal (ID C 532A, B, or C and 320) and the missing training covered residues other than down-blended oxides and heavy metal. Therefore, the training deficiencies did not affect the quality of the data since the individuals were trained on WAP Requirements applicable to their role in the Residue Visual Verification process and the data are acceptable as is. Review of NCR Disposition: Residue Verification Technical Supervisor (TS)/Quality Assurance Officer (Name: Daniel L. Stewart; Signature Date 3/17/04)). Use-As-Is. Scheduled Completion Date: 3/19/04 Disposition Performance Results: Acceptable; Results verified by F.J. Grady, Signature Date 3/17/04. Closure: Closed based on technical justification for “Use-As-Is” disposition. The PQAO or designee will verify insertion of this NCR in each BDR listed on pages 2 &amp; 3. This verification will be performed during Project Level Validation law PRO-940-WIPP-010. Trend Code: WST-TRA10. Final QA Review By: John Tressell, Signature Date 3/18/04.</td>
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<thead>
<tr>
<th>NCR Number: 130</th>
<th>Responsible Organization</th>
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<tr>
<td>2004-000210</td>
<td>Rocky Flats Environmental Technology Site RA Eschenbaum</td>
<td>3/16/2004</td>
<td>3/19/2004</td>
<td>3/18/2004</td>
<td>WIPP Related; Yes Location: B371 Nonconformance Description: An individual signed on inner can data sheets when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. D. Dustin signed for the cans shown on the attached as SME. Requirement Violated: DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2; WIPP Hazardous Waste Permit WAP Section B3-14. Actions: Immediate Actions Taken: None; profile not approved for shipping. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager: G.A. O'Leary, Signature Date 3/16/04). Final Disposition: This nonconformance was regarding two training restrictions, one for J. Hale for not having viewed the WAP Indoc video and one for D. Dustin for not having read two solid sampling procedures and the Salt Process Control Plan. J. Hale signed as operator or verifier for packaging residues. This individual had completed the Residue Verification training qualification that covered the Quality Assurance Objectives applicable to Visual Verification, whereas the WAF video tape is more general and does not contain specific information on the Residue Verification process. The other member of the operator/verifier pair was fully trained. D. Dustin signed as SME for packaging down-blended oxides and heavy metal (ID C 532A, B, or C and 320) and the missing training covered residues other than down-blended oxides and heavy metal. Therefore, the training deficiencies did not affect the quality of the data since the individuals were trained on WAP Requirements applicable to their role in the Residue Visual Verification process and the data are acceptable as is. Review of NCR Disposition: Residue Verification Technical Supervisor (TS)/Quality Assurance Officer (Name: Daniel L. Stewart; Signature Date 3/17/04)). Use-As-Is. Scheduled Completion Date: 3/19/04 Disposition Performance Results: Acceptable; Results verified by F.J. Grady, Signature Date 3/17/04. Closure: Closed based on technical justification for “Use-As-Is” disposition. The PQAO or designee will verify insertion of this NCR in each BDR listed on pages 2 &amp; 3. This verification will be performed during Project Level Validation law PRO-940-WIPP-010. Trend Code: WST-TRA10. Final QA Review By: John Tressell, Signature Date 3/18/04.</td>
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<td>NCR Number: CBO 200400211</td>
<td>Responsible Organization: Rocky Flats Environmental Technology Site</td>
<td>Date Identified: 3/17/2004</td>
<td>Date NCR Received: 3/19/2004</td>
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<tr>
<td>NCN Number:</td>
<td>C. L. Ferrera</td>
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</table>

**Deficiency:**
Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager: GA O'Leary, Signature Date 3/16/04).
Final Disposition: This nonconformance was regarding a training restriction for D. Dustin for not having read two solid sampling procedures and the Salt Process Control Plan. D. Dustin signed as SME for packaging down-blended oxides and heavy metal (IDC 532A, B, or C and 320) and the missing training covered residues other than down-blended oxides and heavy metal. The training deficiencies did not affect the quality of the data since the individual was trained on WAP Requirements applicable to his role in the Residue Visual Verification process and the data are acceptable as is.
Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer (Name: Daniel L. Stewart, Signature Date 3/17/04).
Use-As-Is. Scheduled Completion Date: 3/19/04.
Disposition Performance Results: Acceptable. Results verified by F. J. Grady, Signature Date 3/17/04.
Closure: Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in each BDR listed on pages 2-5. This verification will be performed during Project Level Validation in accordance with PRO-940-WIPP-010. Trend Code: WST-TRA10. Final QA Review By: John Tressell, Signature Date 3/18/04.

**Comments:**
Item I.D. # / Description: List of Residue Visual Batch Data Reports provided by site as Attachment; for inclusion in WIPP Operating Record.


WIPP Related: Yes
Location: NBS
Nonconformance Description: One individual (S. M. Kocot) signed Appendix 5 (Salt Residues Repack Run Sheet) and Appendix 9 (Individual Container Data Level Validation Checklist) of PRO-4-W84-RS-0114 for the three containers identified above before fully completing the Certification Package for Process Specialist/Supervisor Salt Stabilization. The Theoretical Knowledge Verification for Item Number 008, Package Stabilized Salt Residue, was not signed off until 5/12/99 and the Final Certification was not signed off until 6/30/99.

**Requirement Violated:**
DOE/CBO-94-1012, Quality Assurance Program Document, Section 1.2; WIPP Hazardous Waste Permit WAP Section 83-14

**Actions:**
Immediate Actions Taken: Individual's training history reviewed.
Validation: Significance Lvl: Low; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager: G. A. O'Leary, Signature Date E. L. D'Amico for GAO 3/18/04).
Final Disposition: This nonconformance was regarding an individual (S. M. Kocot) signing Appendix 5 (Salt Residues Repack Run Sheet) and/or Appendix 9 (Individual Container Data Level Validation Checklist) of PRO-4-W84-RS-0114 for the three containers identified above before fully completing the Certification Package for Process Specialist/Supervisor Salt Stabilization. The Theoretical Knowledge Verification for Item Number 008, Package Stabilized Salt Residue, was not signed off until 5/12/99 and the Final Certification was not signed off until 6/30/99. In addition, the individual had received training on procedure PRO-4-W84-0114 (as shown by the attached training rosters) and was working with another individual (the Verifier) who did have all the needed training. Therefore, the training deficiencies did not affect the quality of the data and the Visual Verification data is useable as is.
Review of NCR Disposition: Visual Verification Technical Supervisor (TS)/Quality Assurance Officer (Name: Daniel L. Stewart, Signature Date 3/18/04).
Use-As-Is. Scheduled Completion Date: 3/19/04.
Disposition Performance Results: Acceptable. Results verified by F. J. Grady, Signature Date 3/19/04.
Closure: Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in each BDR RS-DP-088. The PQAO or designee will verify insertion of this NCR in each BDR RS-DP-
<table>
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<th>NCR Number: 068</th>
<th>Responsible Organization</th>
<th>Date Identified</th>
<th>Data NCR Received</th>
<th>Date Closed</th>
<th>Deficiency</th>
</tr>
</thead>
</table>

This verification will be performed during Project Level Validation law PRO-940-WIPP-010. Trend Code: WST-TRA10.
Final QA Review By: John Tressell, Signature Date 3/19/04.

**Comments:** None
PLAN AND PROCEDURE CHANGE REPORT

February 1, 2004 – February 29, 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 February 1 through February 29, 2004, there were eight reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the Idaho National Engineering and Environmental Laboratory (INEEL) Labs and the Rocky Flats Environmental Technology Site (RFETS). The changes were approved by CBFO during February 2004.
## Plan and Procedure Change Report

### INEEL Labs

<table>
<thead>
<tr>
<th>Tracking #</th>
<th>CBFO Approval Date</th>
<th>Document Title</th>
<th>Change Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>04-0268</td>
<td>2/3/2004</td>
<td>ACMM-9500, R9, Sample Preparation for Semivolatile Organic Compounds and Polychlorinated Biphenyls</td>
<td>Added provisions for using a single combined surrogate spiking solution for SVOCs; added alternative for handling highly contaminated samples.</td>
</tr>
<tr>
<td>04-0262</td>
<td>2/5/2004</td>
<td>ACMM-9270, R6, Semivolatile Organic Compounds by Gas Chromatography/Mass Spectrometry</td>
<td>Clarified tuning requirements for SVOC &amp; VOC analysis; added two site-specific analytes to Target Analyte List.</td>
</tr>
</tbody>
</table>

### RFETS

<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>04-0263</td>
<td>2/3/2004</td>
<td>95-QAPjP-0050, V9, Rocky Flats Environmental Site TRU Waste Characterization Program Quality Assurance Project Plan</td>
<td>Changes to address offsite sample analysis.</td>
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<tr>
<td>Document ID</td>
<td>Date</td>
<td>Description</td>
<td>Changes</td>
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<tr>
<td>04-0279</td>
<td>2/6/2004</td>
<td>PRO-1351-440-SWB, V4, Room 113 Perma-Con Operations</td>
<td>Clarified verification of DAC.</td>
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<tr>
<td>04-0283</td>
<td>2/6/2004</td>
<td>PRO-944-WIPP-008, V4, Completion of Waste Stream Profile Form for Waste to be Disposed of at WIPP</td>
<td>Added requirement to add TICs to appropriate target analyte list in the QAP/IP; clarified use of control charting.</td>
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<tr>
<td>04-1016</td>
<td>2/19/2004</td>
<td>PRO-1031-WIPP-1112, V3, TRU/TRM Waste Visual Verification (V2) and Data Review</td>
<td>Clarified instructions for NCRs and corrective actions; clarified waste selection for batching; clarified training requirements &amp; ITR responsibilities.</td>
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<tr>
<td>04-1038</td>
<td>2/25/2004</td>
<td>PRO-604-RC-001, V3, Field Sample QC Data Calculation, Review, and Validation Batch Reports</td>
<td>Changed significance level for non-normality tests from 0.10 to 0.05.</td>
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