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

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April 30, 2004

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MAY 2004
NMED Hazardous Waste Bureau

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: 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 March 24 through April 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 March 1 through March 31, 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,

R. Paul Detwiler
Acting Manager

Enclosure

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

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*ED denotes electronic distribution
CBFO:QA:ALH:GS:04-0028:UFC 2300.00

MONTHLY SUMMARIZATION REPORT

FOR

SITE-GENERATED NONCONFORMANCE REPORTS

March 24, 2004 – April 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 March 24 through April 23, 2004, there were thirty reportable Nonconformance Reports (NCRs), generated by the *Rocky Flats Environmental Technology Site* (RFETS) and the *Idaho National Engineering and Environmental Laboratory Advanced Mixed Waste Treatment Project* (INEEL AMWTP), while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 3/24/2004

Earliest End Date = 4/23/2004

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

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
132 / 2004-000212	RF / Rocky Flats Environmental Technology Site	3/21/2004 / C.L. Ferrera	3/25/2004	3/22/2004	WIPP Related: Yes Item I.D. # / Description: List of Headspace Gas Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Thirteen containers had individuals signing as Recorder, Verifier, and/or Supervisor when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. For each container, the Recorder, Verifier, and /or Supervisor had some restriction for not having completed the TWCP Indoctrination (TIP Code A), the WAP Indoctrination (TIP Code A-1), and/or the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L). **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: A screening process was put in place to check all containers for headspace gas training problems prior to shipment to WIPP. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes. Responsible Manager Ed McCarthy, Signature Date 3/21/04. Final Disposition: This nonconformance was regarding a training restriction for not having viewed the TWCP Indoctrination video, the WAP Indoctrination video, and/or for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances. The individuals had completed the headspace gas qualification and all other training specified in the TIP. The headspace gas qualification did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to headspace gas sampling, whereas the TWCP video tape and WAP video tape provide a more general introduction to the WIPP program overall. In addition, the individuals did not need to know the details of processing waste nonconformances to perform their role in the headspace process. Therefore, the training deficiency did not affect the quality of the data and the headspace gas data is useable as is. Review of NCR Disposition: Headspace Gas Technical Supervisor/Quality Assurance Officer R. D. Thiel, Signature Date 3/22/04. Use-As-Is. Scheduled Completion Date: 3/22/04 Disposition Performance Results: Acceptable. Results verified by F. J. Grady, Signature Date 3/22/04. 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 page 2. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature Date 3/22/04. Trend Code WST-TRA10. **Comments:** None
133 / 2004-000213	RF / Rocky Flats Environmental Technology Site	3/22/2004 / C. L. Ferrera	3/25/2004	3/22/2004	WIPP Related: Yes Item I.D. # / Description: Headspace Gas Batch Data Report HGAS-DP-00602 Location: NBS Nonconformance Description: One container (DD1462) had an individual (Horn) who signed as the Verifier on 7/10/03 when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individual's qualification had expired on 1/11/03. **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: A screening process was put in place to check all containers for headspace gas training problems prior to shipment to WIPP.

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Validation: Significance Lvl: Low; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 3/22/04). Final Disposition: This nonconformance was regarding a training problem for not having a current headspace gas qualification. The qualification had expired on 1/11/03 and the individual signed off as Verifier on one drum on 7/10/03. The original headspace gas qualification (033-323-01) taken by the individual had covered the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to his role in the headspace gas sampling process. Even though the qualification had lapsed, the individual continued to receive training on changes to the procedure (see the attached training rosters dated 1/30/03 and 3/11/03 for Procedure PRO-1351-440-SWB, Room 113 Perma-Con Operations). Therefore, the training deficiency did not affect the quality of the data and the headspace gas data is useable as is. Review of NCR Disposition: Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer: Mark J. Mensik, Signature date 3/22/04. Use-As-Is. Scheduled Completion Date: 3/23/04. Disposition Performance Results: Acceptable. Results Verified By: F. J. Grady, Signature date 3/22/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in BDR HGAS-DP-00602. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By John Tressell, Signature date 3/22/04. Trend Code WST-TRA10.
				Comments:	None
134 2004-000255	RF Rocky Flats Environmental Technology Site	4/1/2004 RA Eschenbaum	4/2/2004	4/2/2004	WIPP Related: Yes Item I.D. # / Description: List of Headspace Gas Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: The attached list shows the containers that individuals signed as Recorder, Verifier, and/or Supervisor when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. For each container, the Recorder, Verifier, and /or Supervisor had some restriction for not having completed the TWCP Indoctrination (TIP Code A), the WAP Indoctrination (TIP Code A-1), and/or the required reading of PRO-U76-WC-4030, Control of Waste Non-conformances (TIP Code L).
				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: Shipment of affected containers has been put on hold. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 4/1/04). Final Disposition: This nonconformance is regarding a training restriction for not having viewed the TWCP Indoctrination video, the WAP Indoctrination video, and/or for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances. The individuals had completed the headspace gas qualification and all other training specified in the TIP. The headspace gas qualification did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to headspace gas sampling, whereas the TWCP video tape and WAP video tape provide a more general introduction to the WIPP program overall. In addition, the individuals did not need to know the details of processing waste nonconformances to perform their role in the process. Therefore, the training deficiency did not affect the quality of the data and the headspace gas data is useable as is. Review of NCR Disposition: Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer Mark J. Mensik, Signature date 4/1/04. Use-As-Is. Scheduled Completion Date: 4/10/04. Disposition Performance Results: Acceptable. Results/Comments/Supporting Information: Reviewed attached training status for all affected containers. Results Verified By: F. J. Grady, Signature date 4/2/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					NCR in each BDR listed on attachment. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/2/04. Trend Code WST-TRA10. **Comments:** None
135 / 2004-000256	RF Rocky Flats Environmental Technology Site	4/1/2004 / RA Eschenbaum	4/2/2004	4/2/2004	WIPP Related: Yes Item I.D. # / Description: Headspace Gas Batch Data Reports HGAS-DP-00550, -00568, -00595, -00603 with containers shown on attachment. Location: NBS Nonconformance Description: Eight containers (see attached) had an individual (Horn) who signed as the Verifier or Recorder between 5/15/03 and 7/10/03 when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individual's qualification had expired on 1/11/03. **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: Shipment of applicable containers to WIPP has been stopped. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 4/1/04). Final Disposition: This nonconformance was regarding a training problem for not having a current headspace gas qualification. The qualification had expired on 1/11/03 and the individual signed off as Verifier on eight containers between 5/15/03 and 7/10/03. The original headspace gas qualification (033-323-01) taken by the individual had covered the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to his role in the headspace gas sampling process. Even though the qualification had lapsed, the individual continued to receive training on changes to the procedure (training rosters dated 1/30/03 and 3/11/03 for Procedure PRO-1351-440-SWB, Room 113 Perma-Con Operations attached to NCR 2004-000213). Therefore, the training deficiency did not affect the quality of the data and the headspace gas data is useable as is. Review of NCR Disposition:Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer: Mark J. Mensik, Signature date 4/1/04. Use-As-Is. Scheduled Completion Date: 4/10/04. Disposition Performance Results: Acceptable. Results Verified By: F. J. Grady, Signature date 4/2/04. 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 attachment. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/2/04. Trend Code WST-TRA10. **Comments:** None
136 / 4464	IA INEEL Advanced Mixed Waste Treatment Project	3/15/2004 / Dumas, Elvin	4/5/2004	3/24/2004	Two containers have been entered into WWIS and Certified that do not meet WIPP requirements. Container 10000520 was examined in RTR03-00031, but was rejected on 10/8/03 through the evaluation and disposition of NCR 3598, due to an incomplete audio/video recording. The container RTR analysis was verified as statused Non Reportable, and NCR 3598 closed. A final QA review of containers identified for payloads identified container 10000520 in payload BN10008733. After further review, it was determined that the rejected RTR analysis was used for WWIS certification for this container. Further evaluation determined that Container 10007780, examined in RTR Batch RTR04-00002, was reported as having free liquids in excess of WIPP WAC requirements. The amount of liquid and available fill factor precluded treatment through Liquid Absorption. Container 100007780 was identified and flagged during Level 2 validation as having liquid amounts that exceed the acceptance criteria. Container 100007780 was released for payload assembly BN10008780. These containers were loaded in a Ten Drum overpack when this determination was made, but were not loaded into a TRUPACT II.

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Corrective Action Report 4465 has been initiated to identify the immediate actions taken, investigative actions taken to identify the causes that led to this condition and implement preventive corrective action plan to effectively preclude this condition from recurrence. **Requirement Violated:** MP-TRUW-8.5, sect. 4.2.1; MP-TRUW-8.16, sect. 4.4.1 **Actions:** Disposition: Rework. Date Due: 3/24/04 Dispostion Desc. / CAP: Rework payload BN10008733 to remove drum 10000520 from the payload and replace with an acceptable container and submit new payload configuration for WWIS certification. Rework payload BN10008780 to remove drum 10007780 from the payload and rplace with an acceptable container and submit new payload configuration for WWIS certification. QA Disposition review comment: As noted in the condition description, CAR 4465 has been initiated to address analysis and identify appropriate corrective actions to resolve the cause(s) that led to this condition. (E. Dumas, 3/15/04) QA Update: Corrective action for this NCR is complete. Payloads BN10008733 and BN10008780 have been reworked to remove these two containers. (Ref. attached documentation) CAR 4465 will address the analysis and identification of corrective action to resolve the cause of this condition. (P. Utley, 3/24/04) **Comments:** None
137 4593	IA INEEL Advanced Mixed Waste Treatment Project	3/23/2004 Charles Colby	4/1/2004	OPEN	Drums associated with this BDR 1) 10003964 6) 10007161 11) 10007539 2) 10002844 7) 10007538 12) 10007565 3) 10003958 8) 10007224 13) 10003866 4) 10007184 9) 10007225 5) 10007547 10) 10007122 HSG03-00408 was analyzed on 12/26/2004. The Batch Data Report (BDR) was subsequently generated on 01/28/2004. The operations chemist who generated the BDR used the incorrect data files to generate the BDR. The data files the chemist used were a mixture of data collected for HSG04-00094 (which was analyzed on 01/24/2004) and from the correct batch (HSG03-00408). The two dates appear in the batch generated (HSG03-00408). The correct date of 12/26/04 is shown on the cover page, case narrative ect. ; however the CCV, Field Blank and eleven of the thirteen drum analysis sheets show the HSG04-0094 data and analysis dates. This batch has been validated and signed off by SPM. The validation process failed to catch the inconsistencies above. As the first drum from this batch was presented for WWIS entry, the WCO recognized that the dates were inconsistent, and stopped data entry. QA Manager condition review comment: A Corrective Action Report will be issued to evaluate the causes related to this NCR to document actions to address failures in data validation at both Level 1 and Level 2 reviews. (E. Dumas, 3/26/04) **Requirement Violated:** INST-OI-13, WIPP WAP **Actions:** Disposition: Rework Date Due: 04/29/2004 Dispostion Desc. / CAP: The corrective action plan associated with this NCR will include the following actions to be carried out: 1) A thorough review of HSG Batch Data Reports will be conducted to ensure that this condition does not exist against any other HSG containers or Batch Data Reports. Actionee: Scott Riley Completion Date: March 29th, 2004 2) Perform re-work of this batch against the correct sample/analysis date of 12/26/03, ensure the QC's and drum analysis are correct. Conduct validation through ITR, TS/QA, SQAO and SPM. Actionee: Charley Colby Completion

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Date: April 9th, 2004 3) Conduct interview with the employees who participated in the BDR Generation and Validation. Discuss the issue(s) associated with inattention to detail, lack of thoroughness, and ensure they understand the consequences of not meeting Data Quality Objectives. Actionee: Eric Schweinsberg Completion Date: April 5th, 2004 4) Conduct a Lesson's Learned Briefing with the appropriate PLV&V personnel associated with HSG. The briefing will entail procedural compliance, attention to detail, and other issues associated with this NCR. Actionee: Charley Colby Completion Date: April 8th, 2004 QA Manager review comment: All actions to prevent recurrence following investigative analysis will be identified and documented on Corrective Action Report 4634. (Elvin Dumas, 4/1/04)
				Comments:	None
138 / 4612	IA / INEEL Advanced Mixed Waste Treatment Project	3/26/2004 / Charles Colby	4/1/2004	OPEN	HSG04-00266 headspace BDR was validated by level 1 and level 2 containing an E-Flag for Hydrogen on drum 10010522. A NCR was not generated by the operations chemist for this drum. The drum should have been dispositioned as a reject for resample after an appropriate aspiration time. QA Manager review comment: A Corrective action report will be issued to address the failure to correctly identify this condition at both Level 1 and 2 validation. (E. Dumas, 3/26/04)
				Requirement Violated:	OI-13, MP-TRU 8.8, sect 4.6.1.7.8; MP-TRUW-8.9
				Actions:	Disposition: Rework. Date Due: 04/19/2004. Dispostion Desc. / CAP: The corrective action plan associated with this NCR will include the following actions to be carried out: (1) Rev the BDR by performing re-work of this batch and attach this NCR making drum 10010522 non reportable due to an E-Flag for Hydrogen. Conduct validation through ITR, TS/QA, SQAO and SPM again. Actionee: Charley Colby Completion Date: April 9th, 2004 3) Conduct interview with the employees who participated in the BDR Generation and Validation. Discuss the issue(s) associated with inattention to detail, lack of thoroughness, and ensure they understand the consequences of not meeting Data Quality Objectives. Actionee: Eric Schweinsberg Completion Date: April 5th, 2004 4) Conduct a Lesson's Learned Briefing with the appropriate PLV&V personnel associated with HSG. The briefing will entail procedural compliance, attention to detail, and other issues associated with this NCR. Actionee: Charley Colby Completion Date: April 8th, 2004 QA Manager corrective action review comment: All actions to prevent recurrence following investigative analysis will be identified and documented on Corrective Action Report 4634. (Elvin Dumas, 4/1/04)
				Comments:	None
139 / 4613	IA / INEEL Advanced Mixed Waste Treatment Project	3/26/2004 / Charles Colby	4/1/2004	OPEN	Drum 10000505 was intially RTR'ed verifing a liner puncture. The RTR batch that confirmed a liner puncture was then made non-reportable for RTR due to an incomplete scan on the replicate drum in the RTR batch. The drum was then later re-RTR'ed in a new validated RTR batch and the liner puncture was not verified. The WTS HSG report showed both sets of data (non-reportable RTR, and Validated). HSG chemists used the incorrect (non-Reportable data) RTR data to validate the DAC requierment. HSG03-00313 was validated through SPM using the incorrect liner puncture data. QA Manager review comment: A Corrective Action Report will be issued to evaluate the causes related to this NCR as well as NCR 4612 and NCR 4614. These NCRs document failures in data validation at both Level 1 and 2 to correctly identify deficiencies in data reporting.

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					(E. Dumas, 3/26/04) **Requirement Violated:** INST-OI-13, MP-TRU 8.8; MP-TRUW-8.9 **Actions:** Disposition: Rework Date Due: 04/19/2004 Dispostion Desc. / CAP: The corrective action plan associated with this NCR will include the following actions to be carried out: 1) Rev the BDR by performing re-work of this batch. Conduct validation through ITR, TS/QA, SQAO and SPM. Initiate an SCR to correct WTS HSG Reports to only report reportable RTR data from RTR batches. Actionee: Charley Colby Completion Date: April 9th, 2004 QA Manager review comment: All actions to prevent recurrence following investigative analysis will be identified and documented on Corrective Action Report 4634. (Elvin Dumas, 4/1/04) **Comments:** None
140 / 4614	IA / INEEL Advanced Mixed Waste Treatment Project	3/26/2004 / Charles Colby	4/1/2004	OPEN	Drum 10000096 was intially RTR'ed verifing a liner puncture. The RTR batch that confirmed a liner puncture was then made non-reportable for RTR due to an incomplete scan on the replicate drum in the RTR batch. The drum was then later re-RTR'ed in a new validated RTR batch and the liner puncture was not verified. The WTS HSG report showed both sets of data (non-reportable RTR, and Validated). HSG chemists used the incorrect (non-Reportable data) RTR data to validate the DAC requirement. HSG03-00309 was validated through SPM using the incorrect liner puncture data. QA Manager review comment: A Corrective action report will be issued to address the failure to correctly identify this condition at both Level 1 and 2 validation. (E. Dumas, 3/26/04) **Requirement Violated:** INST-OI-13, MP-TRU 8.8, MP-TRUW-8.9 **Actions:** Disposition: Rework Date Due: 04/19/2004 Dispostion Desc. / CAP: The corrective action plan associated with this NCR will include the following actions to be carried out: 1) Rev the BDR by performing re-work of this batch . Conduct validation through ITR, TS/QA, SQAO and SPM. Intiate an SCR to correct WTS HSG Reports to only report reportable RTR data from RTR batches. Actionee: Charley Colby Completion Date: April 9th, 2004 QA Manager review comment: All actions to prevent recurrence following investigative analysis will be identified and documented on Corrective Action Report 4634. (Elvin Dumas, 4/1/04) **Comments:** None
141 / 4640	IA / INEEL Advanced Mixed Waste Treatment Project	4/1/2004 / Don Warner	4/5/2004	OPEN	Drum 10006477 was initially RTR'ed verifing a liner puncture. Although drum contains two filters, review of RTR data found drum to contain no liner puncture. DAC Scenario needs to be reassessed. This was discovered during Data Assurance Team review. Batch was previously validated through SPM. QA Review Comment: The causes related to this NCR, as well as NCR 4612, 4613, and 4614 will be evaluated, and corrective action implemented, through Corrective Action Report 4634. These NCRs document failures in data validation at both Level I and Level II to correctly identify deficiencies in data reporting. (P. Utley, 4/01/04)

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Requirement Violated: INST-OI-13
					Actions: Disposition: Rework Date Due: 04/19/2004 Dispostion Desc. / CAP: The corrective action plan associated with this NCR will include the following actions to be carried out: 1) Rev the BDR by performing re-work of this batch . Conduct validation through ITR, TS/QA, SQAO and SPM. Intiate an SCR to correct WTS HSG Reports to only report reportable RTR data from RTR batches. Actionee: Charley Colby Completion Date: April 9th, 2004 QA Manager review comments: Preventive actions to preclude recurrence of this condition will be addressed in the Corrective Action Plan in response to CAR 4634. (E. Dumas, 4/5/04)
					Comments: None
142 / 2004-000141	RF / Rocky Flats Environmental Technology Site	3/8/2004 / C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Five individuals signed as either the Originator or Validator on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individuals were restricted for not having completed the WAP Indoctrination (TIP Code A-2).
					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: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having viewed the WAP Indoctrination video. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The Visual Verification Course 033-345-00 taken did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to Visual Verification, whereas the WAP video tape is more general and does not contain specific information on the Visual Verification process. Therefore, the training deficiency did not affect the quality of the data since both individuals were both trained on WAP requirements applicable to their role in the Visual Verification process and the data are useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04.
					Comments: This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
143 / 2004-000142	RF / Rocky Flats Environmental Technology Site	3/8/2004 / C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Two individuals signed as either the Originator or Validator on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individuals were restricted for not having completed the TWCP Indoctrination (TIP Code A).
					Requirement Violated: DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Actions: Immediate Actions Taken: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having viewed the TWCP Indoctrination video. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The Visual Verification Course 033-345-00 taken did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to Visual Verification, whereas the TWCP video tape is a more general introduction to the WIPP program overall and does not contain specific information on the Visual Verification process. Therefore, the training deficiency did not affect the quality of the data since both individuals were both trained on WAP requirements applicable to their role in the Visual Verification process and the data are useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04. **Comments:** This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
144 2004-000143	RF Rocky Flats Environmental Technology Site	3/8/2004 C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Six individuals signed as either the Originator or Validator on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individuals were restricted for not having completed the TWCP Indoctrination (TIP Code A) and the WAP Indoctrination (TIP Code A-1). **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: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having viewed the TWCP Indoctrination and WAP Indoctrination videos. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The Visual Verification Course 033-345-00 taken did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to Visual Verification, whereas the TWCP video tape and WAP video tape provide a more general introduction to the WIPP program overall. Neither video tape contains specific information on the Visual Verification process. Therefore, the training deficiency did not affect the quality of the data since both individuals were both trained on WAP requirements applicable to their role in the Visual Verification process and the data are useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04. **Comments:** This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
145 2004-000144	RF Rocky Flats Environmental Technology Site	3/8/2004 C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Eleven individuals signed as either the Originator or Validator on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individuals were restricted for not having completed the Visual Verification TRU/TRM Waste Visual Verification Area Specific Checklist (TIP Code D-8).

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Requirement Violated: DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2
					Actions: Immediate Actions Taken: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having completed the TRU/TRM Waste Visual Verification Area Specific Checklist. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. In all but one case, the accompanying Validator or Originator had completed the checklist. For the one case in which both individuals had not completed the checklist, one of the individuals (D. Arney) was a foreman who was familiar with waste generation and was knowledgeable of the area. Therefore, the training deficiency did not affect the quality of the data since the individuals had sufficient training for their role in the Visual Verification process and the data are useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04.
					Comments: This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
146 2004-000145	RF Rocky Flats Environmental Technology Site	3/8/2004 C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Twelve individuals signed as either the Originator or Validator on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individuals were restricted for not having completed required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L).
					Requirement Violated: DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2
					Actions: Immediate Actions Taken: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having completed required reading of PRO-U76-WC-4030, Control of Waste Nonconformances. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The individuals had received training on PRO-U76-WC-4030 during the WIPP TRU Waste Characterization Program Indoctrination to the extent necessary to perform as an originator or validator in the Visual Verification process. Therefore, the training deficiency did not affect the quality of the data and the Visual Verification data is useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04.
					Comments: This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
147 2004-000146	RF Rocky Flats Environmental Technology Site	3/8/2004 C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Nine containers had Originator/Validator pairs (12 different individuals) who signed on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. For each container, the Originator/Validator pair was comprised of individuals having some restriction for not having completed the TWCP Indoctrination (TIP Code A), the WAP Indoctrination (TIP Code A-1), and/or the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L).

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					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: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having viewed the TWCP Indoctrination video, the WAP Indoctrination video, and/or for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The Visual Verification Course 033-345-00 taken did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to Visual Verification, whereas the TWCP video tape and WAP video tape provide a more general introduction to the WIPP program overall. Neither video tape contains specific information on the Visual Verification process. In addition, the individuals had received training on corrective action and NCRs through training on Section 10 of PRO-1031-WIPP-1112, TRU/TRM Waste Visual Verification and Data Review to the extent necessary to perform as an originator or validator in the Visual Verification process. Therefore, the training deficiency did not affect the quality of the data and the Visual Verification data is useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04.
					Comments: This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
148	RF	3/8/2004	4/13/2004	OPEN	WIPP Related: Yes
2004-000147	Rocky Flats Environmental Technology Site	C. L. Ferrera			Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Nine containers had Originator/Validator pairs (six different individuals) who signed on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. For each container, the Originator/Validator pair was comprised of individuals having some restriction for not having completed the TWCP Indoctrination (TIP Code A), the WAP Indoctrination (TIP Code A-1), and/or the Visual Verification TRU/TRM Waste Visual Verification Area Specific Checklist (TIP Code D-8).
					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: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having viewed the TWCP Indoctrination video, the WAP Indoctrination video, and/or for not having completed the Visual Verification TRU/TRM Waste Visual Verification Area Specific Checklist. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The Visual Verification Course 033-345-00 taken did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to Visual Verification, whereas the TWCP video tape and WAP video tape provide a more general introduction to the WIPP program overall. Neither video tape contains specific information on the Visual Verification process. In all cases where the area specific checklist had not been completed, the other member of the Originator/Validator pair had completed the checklist. Therefore, the training deficiency did not affect the quality of the data and the Visual Verification data is useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04.
					Comments: This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
149 / 2004-000148	RF / Rocky Flats Environmental Technology Site	3/8/2004 / C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Two individuals signed as either the Originator or Validator on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. The individuals were restricted for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances, and for not having completed the Visual Verification TRU/TRM Waste Visual Verification Area Specific Checklist (TIP Code D-8). **Requirement Violated:** DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2 **Actions:** Immediate Actions Taken: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances and for not having completed the TRU/TRM Waste Visual Verification Area Specific Checklist. The individuals had completed the Visual Verification qualification and all other training specified in the TIP. The individual had received training on PRO-U76-WC-4030 during (1) the WIPP TRU Waste Characterization Program Indoctrination and (2) training on corrective action and NCRs during training on Section 10 of PRO-1031-WIPP-1112, TRU/TRM Waste Visual Verification and Data Review to the extent necessary to perform as an Originator or Validator in the Visual Verification process. The accompanying Validator or Originator had completed the area specific checklist and had knowledge of the specific area. Therefore, the training deficiency did not affect the quality of the data since the individuals had sufficient training for their role in the Visual Verification process and the data are useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04. **Comments:** This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
150 / 2004-000149	RF / Rocky Flats Environmental Technology Site	3/10/2004 / C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports provided by site as Attachment; for inclusion in Operating Record. Location: NBS Nonconformance Description: Twelve containers had Originator/Validator pairs (eleven different individuals) who signed on the Visual Verification Appendix 1A when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan. For each container, the Originator/Validator pair was comprised of individuals having some restriction for not having completed the TWCP Indoctrination (TIP Code A), the WAP Indoctrination (TIP Code A-1), the Visual Verification TRU/TRM Waste Visual Verification Area Specific Checklist (TIP Code D-8), and/or the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L). In addition, one individual had not completed the annual Site RCRA training (TIP Code H) and two individuals had expired on their Visual Verification qualification (TIP Code D-6) for time periods ranging from 10 days to 51 days. **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: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: This nonconformance was regarding a training restriction for not having viewed the TWCP Indoctrination video (TIP Code A) and/or the WAP Indoctrination video (TIP Code A-1), for not having completed the Visual Verification TRU/TRM Waste Visual Verification Area Specific Checklist (TIP Code D-8), and/or for not having

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L). The individuals had completed the Visual Verification qualification. The Visual Verification Course 033-345-00 taken did cover the scope, purpose, and objectives of the WAP and the specific Quality Assurance Objectives applicable to Visual Verification, whereas the remainder of the training provides more general information. In the two cases where the Visual Verification qualification had lapsed, the lapse was for a short period of time (10 days to 51 days) and the individuals were working with another individual who had current Visual Verification qualification. In the case of the one individual who had not had the annual Site RCRA training, that individual was working with another individual who had completed the RCRA training. Therefore, the training deficiences did not affect the quality of the data and the Visual Verification data is useable as is. Review of NCR Disposition: Not completed. Use-As-Is. Scheduled Completion Date: 3/11/04. **Comments:** This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
151 2004-000150	RF Rocky Flats Environmental Technology Site	3/11/2004 C. L. Ferrera	4/13/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: List of Visual Verification Batch Data Reports and listing of Visual Verification data not yet incorporated in batch data reports provided by site as Attachments; for inclusion in Operating Record. Location: NBS Nonconformance Description: Forty-two containers were packaged according to the Visual Verification process with an Originator and/or Validator who did not have the Visual Verification qualification (TIP Code D-6) at the time of packaging. An additional container (DD0806) was signed by the same person as Originator and Validator on the Visual Verification Appendix 1A. **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: Shipments to WIPP were suspended until all affected containers were identified and controlled. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date not available) Final Disposition: Scrap the Visual Verification data. Review of NCR Disposition: Not completed. Scrap. Scheduled Completion Date: 3/11/04. **Comments:** This NCR was initially transmitted to wipp.notify by RFETS on 3/11/04.
152 2004-000264	RF Rocky Flats Environmental Technology Site	4/5/2004 RA Eschenbaum	4/14/2004	4/6/2004	WIPP Related: Yes 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: Two individuals signed as operator and/or verifier on inner can data sheets when not trained and qualified in accordance with PLN-97-007, TWCP Training Implementation Plan (TIP). They were missing the VE Briefing (TIP Code RSP-010) which is a one-time briefing. **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: Shipment of affected containers to WIPP has been stopped. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date 4/6/04) Final Disposition: This nonconformance was regarding a training restriction for not having completed the VE Briefing. The objective of the briefing was for attendees to be able to document visual examination activities in accordance with procedures and to identify prohibited items. Documentation of visual examination activities was also covered in the training on the applicable Residue procedure and prohibited items are covered in Waste Generator training. Both of these items are TIP requirements for the operator/verifier. The other operator/verifier had all of the required

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					training. The training deficiencies did not affect the quality of the data and the data are acceptable as is. Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer Daniel L. Stewart, Signature date 4/6/04. Use-As-Is. Scheduled Completion Date: 4/10/04. Disposition Performance Results: Acceptable; Results Verified By: E. L. D'Amico, Signature date 4/6/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in BDRs listed on pages 2 and 3. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/6/04. Trend Code WST-TRA10.
				Comments:	None
153 2004-000269	RF Rocky Flats Environmental Technology Site	4/6/2004 RA Eschenbaum	4/14/2004	4/8/2004	WIPP Related: Yes 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 as operator and/or verifier on inner can data sheets after qualification document (TIP Code SSS-1) had expired. The qualification document expired on 2/20/03 and the individual signed for 7 containers on 6/30/03 and 4 containers on 7/16/04. This is not in accordance with PLN-97-007, TWCP Training Implementation Plan (TIP). In addition on one container, another individual signed without completing the WAP Indoctrination (TIP Code A-2).
				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: Shipment of affected containers to WIPP has been stopped. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager G. A. O'Leary, Signature date 4/6/04) Final Disposition: This nonconformance was regarding a training restriction for not having requalified on the Qualification Document for Residues Repack. During this time, three procedure changes were made to the Residue Repack procedure (PRO-544-SALT REPACK-371) – 1) DC-08 – one step was deleted that had been added in DC-06. The change does not affect the original purpose, scope, or intent of the approved procedure; 2) DC-09 – a clarification was added as an explanatory note to identify possible options for performing size reduction; 3) DC-10 – reference to Room 3412 was removed and an explanatory note was added to ensure that the Room 3602 MAR inventory card is maintained. None of these changes affected the actual repack of residues. The other operator/verifier had all of the required training except for not having viewed the WAP Indoctrination video at the time one can was repacked. 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 training deficiencies did not affect the quality of the data and the data are acceptable as is. Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer Daniel L. Stewart, Signature date 4/7/04. Use-As-Is. Scheduled Completion Date: 4/10/04. Disposition Performance Results: Acceptable. Results/Comments/Supporting Information: Based on disposition justification. Results Verified By: E. L. D'Amico, Signature date 4/7/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in BDRs listed on page 3. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/8/04. Trend Code WST-TRA10.
				Comments:	None

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
154 / 2004-000272	RF / Rocky Flats Environmental Technology Site	4/7/2004 / RA Eschenbaum	4/14/2004	4/8/2004	WIPP Related: Yes Item I.D. # / Description: Site provided as Attachment a list that shows 18 containers where 5 individuals signed as either the Recorder or Verifier prior to completing all the required training for their headspace gas sampling qualification document; for inclusion in Operating Record. Location: NBS Nonconformance Description: The attached list shows 18 containers where 5 individuals signed as either the Recorder or Verifier prior to completing all the required training for their headspace gas sampling qualification document. In each case the person was signing 1. Section 2 of the WIPP Sample Drum Log or WIPP Sample SWB Log that the container had achieved the 72 hour equilibration, the temperature was above the required minimum temperature of 18°C/64°F, the date and time the container was headspaced sampled; and 2. Section 3 marking the type of sample (through filter, through rigid liner, venting of rigid liner, through POC lid) at the direction of the Analytical Laboratory Support Personnel. In addition, all the individuals were restricted for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L). Some were also restricted for not having completed the TWCP Indoctrination (TIP Code A). For five containers the other individual who signed as Recorder or Verifier was restricted for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L). The attachment gives specific training restrictions for each container. **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: Shipment of affected containers has been put on hold. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 4/7/04) Final Disposition: Attachment 2 is the Compliance Tracking Forms and/or circular chart records showing that the temperature was above the minimum required temperature during the 72 Hr. Equilibration and sampling. For two containers, D62174 and D70752, no temperature records could be found for the equilibration time frame of 4/10/01 through 4/13/01. However, the person signing as the Recorder for the "Received" and "72 Hr. Equilibration" dates and times was a fully qualified supervisor. In addition, for these two containers there is a temperature record for the time of sampling and the immediately preceding 72 hours showing compliance with the temperature requirements. The Section 3 marking of the sample type was performed at the direction of the Analytical Laboratory Support Personnel. Therefore, the lack of completed qualification and training is not data quality affecting and the headspace data should be use-as-is for these containers. Review of NCR Disposition: Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer Mark J. Mensik, Signature date 4/8/04. Use-As-Is. Scheduled Completion Date: 4/20/04. Disposition Performance Results: Acceptable. Results/Comments/Supporting Information: Reviewed attached appendices and temperature records for each container. Results Verified By: F. J. Grady, Signature date 4/8/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in BDRs listed on page 3. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/8/04. Trend Code WST-TRA10. **Comments:** None
155 / 2004-000277	RF / Rocky Flats Environmental Technology Site	4/15/2004 / RA Eschenbaum	4/19/2004	4/15/2004	WIPP Related: Yes Item I.D. # / Description: List of Residue Visual Batch Data Reports with applicable containers provided by site as Attachment; for inclusion in Operating Record. Location: B371 Nonconformance Description: 22 containers in 15 Wet Combustibles residue repack batch data reports had personnel sign as Operator, Verifier or Supervisor prior to completing the Drum Tracking System Qualification Building 371/707 (TIP Code RSP-13). In addition, for 2 of the containers the Supervisor (Fenner) signed 1 day and 6

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					days prior to completion of the 371 Combustible Residue Repackaging Qualification. **Requirement Violated:** DOE/CBFO-94-1012, Quality Assurance Program Document, Section 1.2 **Actions:** Immediate Actions Taken: Shipment of affected containers to WIPP has been stopped. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager GA O'Leary, Signature date 4/15/04) Final Disposition: (1) The Drum Tracking System was implemented as a process improvement to aid data recording, readability and minimize math and transcription errors during the Wet Combustible residue repack visual characterization. Rather than recording the data directly on paper, the individual would enter the data on a keyboard and Drum Tracker would perform the applicable math and print the data sheets that were then signed by the Operator, Verifier and Supervisor. In each case the Operator, Verifier and Supervisor were qualified to perform the characterization per the Wet Combustible Residue Repackaging Qualification. In every case, at least one and in most cases two of the three individuals (Operator, Verifier and Supervisor) were Drum Tracker qualified. Therefore, none of these instances is data quality affecting. (2) The Supervisor signed on 6/14/01 and 6/19/01 and his qualification document was signed off on 6/20/01. However, all training and qualification tasks in the qualification document had been completed by 6/7/01. These training deficiencies identified as (1) and (2) did not affect the quality of the data and the data is acceptable for use. Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer Daniel L. Stewart, Signature date 4/15/04. Use-As-Is. Scheduled Completion Date: 4/20/04. Disposition Performance Results: Acceptable. Results/Comments/Supporting Information: Based on Disposition Justification. Results Verified By: E. L. D'Amico, Signature date 4/15/04. 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 Page 2. This verification will be performed during Project Level Validaion iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/15/04l. Trend Code WST-TRA10. **Comments:** None
156 2004-000287	RF Rocky Flats Environmental Technology Site	4/14/2004 RA Eschenbaum	4/19/2004	4/15/2004	WIPP Related: Yes Item I.D. # / Description: DC7399 was headspaced on 1/27/04 but went through RTR on 2/24/04 and > 4 l. unvented containers were identified in the drum. Headspace data is not acceptable with this condition present. Location: 440 Bldg. Nonconformance Description: DC7399 was headspaced on 1/27/04 but went through RTR on 2/24/04 and > 4 l. unvented containers were identified in the drum. Headspace data is not acceptable with this condition present. Headspace data must be voided in batch data report HGAS-DP-00865. **Requirement Violated:** PRO-1351-440-SWB **Actions:** Immediate Actions Taken: Discovered prior to WIPP characterization being started. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager Roger Ballenger, Signature date 4/14/04) Final Disposition: Scrap data from HGAS-DP-00865 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: 4/30/04. Disposition Performance Results: Acceptable. Results Verified By: E. L. D'Amico, Signature date 4/15/04. Closed: Headspace gas data for DC7399 have been deleted from WEMS and scrapped in BDR HGAS-DP-00865. See WEMS "Samples" Form and BDR. Final QA Review By: John Tressell, Signature date 4/15/04. Trend Code WST-PER54.

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
					Comments: None
157 / 2004-000320	RF / Rocky Flats Environmental Technology Site	4/20/2004 / RA Eschenbaum	4/22/2004	4/20/2004	WIPP Related: Yes Item I.D. # / Description: Provided by site as Attachment; for inclusion in Operating Record: List showing 4 containers where an individual signed as either the Recorder or Verifier prior to completing all the required training for the headspace gas sampling qualification document. Location: NBS Nonconformance Description: The attached list shows 4 containers where an individual signed as either the Recorder or Verifier prior to completing all the required training for the headspace gas sampling qualification document. In each case the person was signing (1). Section 2 of the WIPP Sample Drum Log or WIPP Sample SWB Log that the container had achieved the 72 hour equilibration, the temperature was above the required minimum temperature of 18°C/64°F, the date and time the container was headspace sampled; and (2). Section 3 marking the type of sample (through filter, through rigid liner, venting of rigid liner, through POC lid) at the direction of the Analytical Laboratory Support Personnel. In addition, the individual was restricted for not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances (TIP Code L) and for not having completed the WAP Indoctrination (TIP Code A-1).
					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: Shipment of affected containers has been put on hold. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 4/20/04). Final Disposition: The individual had completed the Theoretical Knowledge Verification (TKV) portion of the qualification but not the On-Job-Training (OJT). The TKV portion confirmed the individual had the knowledge required to do the work while the OJT portion required a supervisor to observe the individual doing the actual work. No issues were noted when the OJT portion was completed. The Section 3 marking of the sample type was performed at the direction of the Analytical Laboratory Support Personnel. In addition, not having viewed the WAP Indoctrination video and not having completed the required reading of PRO-U76-WC-4030, Control of Waste Nonconformances., did not affect the data since (1) the headspace gas qualification did cover the scope, purpose, and objectives of the WAP in more detail than the video does, and (2) the individual did not need to know the details of processing waste nonconformances to perform their role in the process. Also, the other person that signed as Recorder or Verifier was fully trained. Therefore, the data is usable as is. Review of NCR Disposition: Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer Mark J. Mensik, Signature date 4/20/04. Use-As-Is. Scheduled Completion Date: 4/30/04. Disposition Performance Results: Acceptable. Results/Comments/Supporting Information: Based on disposition justification. Results Verified By: E. L. D'Amico, Signature date 4/20/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in BDR HGAS-DP-000362. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/20/04. Trend Code WST-TRA10.
					Comments: None

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
158 / 2004-000321	RF / Rocky Flats Environmental Technology Site	4/20/2004 / RA Eschenbaum	4/22/2004	4/20/2004	WIPP Related: Yes Item I.D. # / Description: An individual signed as Verifier for S01696 in batch data report HGAS-DP-00414 prior to final sign-off of their headspace gas sampling qualification document. Location: NBS Nonconformance Description: An individual signed as Verifier for S01696 in batch data report HGAS-DP-00414 prior to final sign-off of their headspace gas sampling qualification document. **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: Shipment of affected containers has been put on hold. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 4/20/04). Final Disposition: The individual (Chu) had completed the qualification but the last signature was not completed on the qualification document until a day after signing for the SWB noted above. The individual had completed all of the training. The training deficiency did not affect the quality of the data and the headspace gas data is useable as is. In addition, the other person that signed as Recorder was fully trained. Review of NCR Disposition: Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer Mark J. Mensik, Signature date 4/20/04. Use-As-Is. Scheduled Completion Date: 4/30/04. Disposition Performance Results: Acceptable. Results Verified By: F. J. Grady, Signature date 4/20/04. Closed based on technical justification for "Use-As-Is" disposition. The PQAO or designee will verify insertion of this NCR in BDR HGAS-DP-00414. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/20/04. Trend Code WST-TRA10. **Comments:** None
159 / 2004-000323	RF / Rocky Flats Environmental Technology Site	4/20/2004 / RA Eschenbaum	4/22/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: During the headspace training review of batch data reports, 4 containers were found where signature(s) were missing for either the Recorder or Verifier. The 4 containers are D68237, D76161 and D66665 in HVOC-DP-00517, and DB8796 in HGAS-DP-00312. Location: NBS Nonconformance Description: During the headspace training review of batch data reports, 4 containers were found where signature(s) were missing for either the Recorder or Verifier. The 4 containers are D68237, D76161 and D66665 in HVOC-DP-00517, and DB8796 in HGAS-DP-00312. In each case the missing signature was in Section 2 of the WIPP Sample Drum Log that the container had achieved the 72 hour equilibration, the temperature was above the required minimum temperature of 18°C/64°F, the date and time the container was headspace sampled. The attachments show the specific signatures missing for each container. **Requirement Violated:** PRO-984-440-HSGS **Actions:** Immediate Actions Taken: Shipment of affected containers has been put on hold. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager Ed McCarthy, Signature date 4/20/04). Final Disposition: Attached to each of the container sample logs is the Compliance Tracking Forms and/or circular chart records showing that the temperature was above the minimum required temperature during the 72 Hr. equilibration and sampling. As noted, all temperatures remained above the minimum for the 72 hour equilibration period. Review of NCR Disposition: Headspace Gas Technical Supervisor (TS)/Quality Assurance Officer Mark J. Mensik, Signature date 4/20/04. Use-As-Is. Scheduled Completion Date: 4/30/04. Disposition Performance Results: Acceptable

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency
				Comments:	None
160 / 2004-000325	RF / Rocky Flats Environmental Technology Site	4/20/2004 / RJ Ballenger	4/22/2004	OPEN	WIPP Related: Yes Item I.D. # / Description: Individuals signed on VE technique in Residue Visual Batch Data Reports without being qualified. The affected containers and batch data reports are DC5823 in WC-DP-122, DC0239 in WC-DP-008, and DC1106 in WC-DP-012. Location: B371 Nonconformance Description: Individuals signed on VE technique in Residue Visual Batch Data Reports without being qualified. The affected containers and batch data reports are DC5823 in WC-DP-122, DC0239 in WC-DP-008, and DC1106 in WC-DP-012. This is not in accordance with PLN-97-007, TWCP Training Implementation Plan (TIP).
				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: Shipment of affected containers to WIPP has been stopped. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager GA O'Leary, Signature date 4/20/04). Final Disposition: The VE technique data for these containers will be scrapped and RTR used in lieu of repacking. Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer Daniel L. Stewart, Signature date 4/21/04. Scrap. Scheduled Completion Date: 4/30/04.
				Comments:	None
161 / 2004-000326	RF / Rocky Flats Environmental Technology Site	4/20/2004 / RJ Ballenger	4/22/2004	4/21/2004	WIPP Related: Yes Item I.D. # / Description: An individual signed on VE technique in Combustible Residue Visual Batch Data Reports for several containers without being qualified. The affected containers and batch data reports are shown on the attachment. Location: B371 Nonconformance Description An individual signed on VE technique in Residue Visual Batch Data Reports for several containers without being qualified. The affected containers and batch data reports are shown on the attachment. This is not in accordance with PLN-97-007, TWCP Training Implementation Plan (TIP).
				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: Shipment of affected containers to WIPP has been stopped. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes (Responsible Manager GA O'Leary, Signature date 4/20/04). Final Disposition: Robert Fairchild signed on several containers as either the Operator or Verifier in October 2002 after his QD had expired on 9/30/02. There were no changes to the operating procedure PRO-823-REPACK-371, Combustible Residue Repackaging, from 5/8/02 (Rev. 1, DC-06) through the last date that Fairchild signed on 10/21/02. In addition, the other person (Verifier or Operator) and the Supervisor were fully qualified in every case when Fairchild signed after his qualification had expired. Therefore, the training deficiency did not affect the quality of the data and the Combustible Residue Repackaging visual data is useable as is.Review of NCR Disposition: Residue Visual Verification Technical Supervisor (TS)/Quality Assurance Officer Daniel L. Stewart, Signature date 4/21/04. Use-As-Is. Scheduled Completion Date: 4/30/04. Disposition Performance Results: Acceptable. Results Verified By: F. J. Grady, Signature date 4/21/04. 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 Page 2. This verification will be performed during Project Level Validation iaw PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 4/21/04. Trend Code WST-TRA10.

NCR Number: CBFO Assigned / Site Assigned:	Responsible Organization	Date Identified / By:	Date NCR Received	Date Closed	Deficency

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

March 1, 2004 – March 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 March 1 through March 31, 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 *Central Characterization Project* (CCP) and the *Rocky Flats Environmental Technology Site* (RFETS). The changes were approved by CBFO during March 2004.

Plan and Procedure Change Report

Start Date: 3/1/2004
End Date: 3/31/2004

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
04-1045	3/1/2004	CCP-TP-007, R19, Draft M, Single Sample Manifold Headspace Gas Sampling and Analysis Procedure & Form CCP-TP-007-A1	Added steps for determining the DAC for repackaged waste.
04-1050	3/4/2004	CCP-TP-011, R15, Draft H, CCP Radiography Inspection Operating Procedure	Clarified confirmation of proper venting; added steps to document replicate scans & independent observations in BDRs.
04-1075	3/15/2004	CCP-PO-001, R8, Draft E, CCP Transuranic Waste Characterization Quality Assurance Project Plan	Removed PCB analysis requirement and disposal restrictions; clarified equipment cleaning method; clarified field & laboratory QC frequencies.
04-1113	3/29/2004	CCP-TP-030, R11, Draft F, CCP TRU Waste Certification and WWIS Data Entry	Clarified steps and sequence of confirming the absence of open NCRs on drums being certified for shipment.

RFETS

Tracking #	CBFO Approval Date	Document Title	Change Description

Plan and Procedure Change Report

Start Date: 3/1/2004
End Date: 3/31/2004

04-1101	3/23/2004	PRO-543-ASD-002, V4, Initiation, Preparation, and Implementation of Chain-of-Custody Forms	Removed onsite laboratory COC steps for WIPP samples; added steps for offsite shipment to INEEL TWCP.
04-1109	3/25/2004	PRO-1618-PLP-001, V2, Data Review and Verification of Solid Sampling Batch Data Reports - TRU Projects	Removed PCB analysis requirement; added use of INEEL TWCP analysis services.
04-1110	3/25/2004	PRO-1585-PWS-440, V1, Polymerized Waste Sampling - Building 440	Removed steps for sampling for PCBs; added steps for use of INEEL TWCP; replaced use of TIDs with custody seals; changed quantity & vial size to meet INEEL TWCP requirements.
04-1108	3/25/2004	PRO-1569-SAP-001, V3, Polymerized Organic and Inorganic Liquid Process - Sampling and Analysis Plan	Added use of INEEL TWCP for analysis services; changed subsample weights and quantities to meet INEEL TWCP requirements.