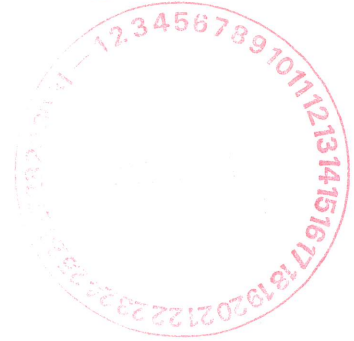


Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

July 29, 2004

ENTERED



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 June 24 through July 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 June 1 through June 30, 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
J. Bearzi, NMED
A. Holland, CBFO



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS

June 24, 2004 – July 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 June 24 through July 23, 2004, there were two reportable Nonconformance Reports (NCRs), generated by the *Lawrence Livermore National Laboratory/Central Characterization Project (LLNL/CCP)*, while characterizing waste at TRU waste generator sites.

Please be advised that the numbering of reportable NCRs for this period begins with CBFO Assigned NCR Number 171 rather than Number 170; CBFO Assigned NCR Number 170 has been voided.

List of ALL NCRs Between the following Dates:

Latest Start Date = 6/24/2004

Earliest End Date = 7/23/2004

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

NCR Number: Responsible Date Identified Date NCR Date Closed Deficiency
 CBEU Assigned Organization Received

Site Assessor: By:

NCR Number: CBEU Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
171	CLL Lawrence Livermore National Laboratory / CCP	6/23/2004 Billy Kirkes	6/24/2004	6/24/2004	During SPM review of Lawrence Livermore BDR# LL04-NDE-0017 on 6/21/04, it was discovered that the Replicate Scan and the Independent Observation waste material parameter weight results did not match the original scans. The packaging weights and net weights did not equal the gross weights of the drums. <u>Requirement Violated:</u> CCP-TP-102, Rev. 2 Section 4.10.4 (Replicate Scan) and Section 4.11.4 (Independent Observation) "If the waste material parameter weight estimate comparison differs by more than +50% for any waste material parameter, THEN perform the following: [A] Reconcile the results by both operators....." <u>Actions:</u> The Operators reviewed the radiography data tape record of the containers and reconciled the estimated waste material Parameter weights. The changes were made to the corresponding data sheets and a re-review of the BDR at the data generation level was performed. The BDR is now back for project level review. Final Disposition Approvals: Responsible Manager/Individual Abraham L. Romo, signature date 6/23/04; SPQAO/FQAO Steve Ewing, signature date 6/23/04. Closure: Final Disposition Complete, Responsible Manager/Individual Abraham L. Romo, signature date 6/23/04. Comment: Completed the reconciliation of WMPs' weights and resubmitted BDR. Final Disposition Verified, SPQAO/FQAO Dean Mooney, signature date 6/24/04.

Comments: None

NCR Number: CBEU Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
172	CLL Lawrence Livermore National Laboratory / CCP	7/1/2004 Billy Kirkes	7/1/2004	OPEN	During investigative actions related to CAR-LLNL-0002-04, a review was performed on BDR LL04-NDE-0013. It was discovered that the original drum scan of LL85600672TRU identified cellulose with an estimated weight of 1 kg but the replicate scan did not identify cellulose. Page 3 of Attachment 6 for the replicate scan stated that the waste material parameter weight estimates agreed within + 50% when in fact they did not for cellulose. <u>Requirement Violated:</u> CCP-TP-102, Rev.2, Section 4.10.4 states that IF the waste material parameter weight estimate comparison differs by more than + 50% for any waste material parameter, THEN perform the following, [A] Reconcile the results by both operators jointly performing a real-time review of the Attachment 6 reviewing the video record with both operators present, OR re-scan the drum with both operators present AND make any required corrections to the Attachment 6. <u>Actions:</u> 1. NDE operators perform re-review of original scan and replicate scan in accordance with Revision 2, section 4.10.4 and revise Data Sheets. 2. Revised Data Sheets are to reference this NCR & a copy of the closed NCR to be included in the BDR. 3. VPM to hold a Briefing with appropriate NDE personnel addressing conditions as identified in this NCR and include documentation of briefing as an attachment to this NCR Actions to Prevent Recurrence: Additional corrective actions, as applicable, will be implemented in accordance with corrective actions identified in CAR-LLNL-002-04.

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

June 1, 2004 – June 30, 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 June 1 through June 30, 2004, there were two 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 were approved by CBFO during June 2004.

Plan and Procedure Change Report

Start Date: 6/1/2004
End Date: 6/30/2004

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
04-1462	6/1/2004	CCP-PO-017, R1, Draft H, CCP/Fluor Hanford Interface Document	Change allows for Hanford proper and CCP Hanford to provide each other with data.
04-1469	6/2/2004	CCP-PO-009, R7, Draft F, CCP/NTS Interface Document	Includes the option for performing Headspace Gas Sampling via SUMMA canisters. This will allow CCP to collect data prior to the certification audit for this process.