Mr. Steve Zappe, Project Leader
Hazardous Materials Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive, Bldg. 1
Santa Fe, NM 87505-6110

September 29, 2004

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 August 24 through September 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 August 1 through August 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,

[Signature]
R. Paul Detwiler
Acting Manager

Enclosure

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

*ED denotes electronic distribution
CBFO/QA/LH/HS:04-1837:UFC 2300.00
MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
August 24, 2004 – September 23, 2004

This summary is submitted pursuant to the requirements of the WIPP Hazardous Waste Facility Permit, Section B3-1, *Nonconformance to Data Quality Objectives (DQOs)*.

During the period of August 24 through September 23, 2004, there were no reportable Nonconformance Reports (NCRs) identified by the TRU waste generator sites.
PLAN AND PROCEDURE CHANGE REPORT

August 1, 2004 – August 31, 2004

This report is submitted pursuant to 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 August 1 through August 31, 2004, there were thirteen reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the Central Characterization Project (CCP), the Idaho National Engineering and Environmental Laboratory/Advanced Mixed Waste Treatment Project (INEEL/AMWTP), the INEEL Labs, and the Rocky Flats Environmental Technology Site (RFETS), and were approved by CBFO during August 2004.
# Plan and Procedure Change Report

**Start Date:** 8/1/2004  
**End Date:** 8/31/2004

<table>
<thead>
<tr>
<th>Tracking #</th>
<th>CBFO Approval Date</th>
<th>Document Title</th>
<th>Change Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>04-1683</td>
<td>8/4/2004</td>
<td>CCP-QP-010, R12, Draft 1, CCP Document Preparation, Approval and Control</td>
<td>Added clarification for SPM responsibilities for reporting data quality changes; added steps for ensuring use of most current procedure revisions.</td>
</tr>
<tr>
<td>04-1684</td>
<td>8/9/2004</td>
<td>INST-OI-34, R9A, Visual Examination Operating Procedures and Data Reporting</td>
<td>Clarified prohibited items and recording weights; added steps for ensuring correct waste stream assignment &amp; new VE in lieu of RTR method.</td>
</tr>
<tr>
<td>04-1921</td>
<td>8/12/2004</td>
<td>MP-TRUW-S-8, R9A, Level II Data Validation</td>
<td>Added requirement for SQAO to initiate an NCR if problems arise at the data generation level of the BDR review process.</td>
</tr>
</tbody>
</table>

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*Friday, September 24, 2004*
Plan and Procedure Change Report

Start Date: 8/1/2004
End Date: 8/31/2004

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>04-1930</td>
<td>8/18/2004</td>
<td>MP-TRUW-8.16, R11, WWIS Data Transfer</td>
<td>Added steps for WWIS Characterization Administrator to verify containers against an approved lot-specific population container report.</td>
</tr>
<tr>
<td>04-1938</td>
<td>8/19/2004</td>
<td>MP-TRUW-8.25, R7, RCRA Statistical Sampling</td>
<td>Added additional checks and verifications to ensure compliance with random sampling requirements.</td>
</tr>
<tr>
<td>04-1937</td>
<td>8/19/2004</td>
<td>MP-TRUW-8.14, R3, Preparation of Waste Stream Profile Forms</td>
<td>Added steps for SPM verification/rejection/disposition of lot specific container lists against approved &quot;Randomly Selected Container Reports&quot;.</td>
</tr>
<tr>
<td>04-1936</td>
<td>8/19/2004</td>
<td>MP-TRUW-8.11, R7, Data Reconciliation</td>
<td>Added steps for DAC evaluation/clarification; added steps for managing lots &amp; verification of lot container lists; clarified the manual/electronic reconciliation processes.</td>
</tr>
</tbody>
</table>
### Plan and Procedure Change Report

**Start Date:** 8/1/2004  
**End Date:** 8/31/2004

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<tr>
<td>04-1698</td>
<td>8/10/2004</td>
<td>PRO-1585-PWS-440, V2, Polymerized Waste Sampling - Building 440</td>
<td>Added steps for core sampling of NoChar &amp; shipment to an off-site laboratory.</td>
</tr>
<tr>
<td>04-1905</td>
<td>8/12/2004</td>
<td>PRO-1569-SAP-001, V4, Polymerized Organic and Inorganic Liquid Process Coke Sampling and Waste Forms Amenable to Grid Sampling - Sampling and Analysis Plan</td>
<td>Added provisions for additional waste types amenable to grid sampling (e.g., soils)</td>
</tr>
</tbody>
</table>