



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

October 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

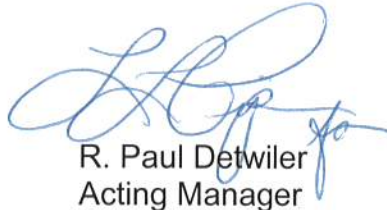
Dear Mr. Zappe:

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 September 24 through October 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 are 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 September 1 through September 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

041028



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
September 24, 2004 – October 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 September 24 through October 23, 2004, there were six reportable Nonconformance Reports (NCRs), generated by the *Idaho National Engineering and Environmental Laboratory Advanced Mixed Waste Treatment Project (INEEL AMWTP)* and the *Rocky Flats Environmental Technology Site (RFETS)*, while characterizing waste at TRU waste generator sites.

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 9/24/2004

Earliest End Date = 10/23/2004

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

NCR Number: CBFO Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
174	IA	9/21/2004	9/24/2004	OPEN	Incorrect radiation dose rate data was submitted to WWIS for payload BN10028065. During the check of the data in the WWIS before submittal, the TCO overlooked the Beta/Gamma value reported as 1mrem/hr instead of the actual survey value of .2 mrem/hr and the Neutron was reported as 1mrem/hr. instead of the actual survey value of .05 mrem/hr. Step 4.2.2.15 of MP-TRUW-8.5 requires a verification of the presubmittal WWIS data against the data reported from Operations following completion of the TDOP assembly. The error was discovered as part of a second confirmation of the submitted WWIS data against the Certification data, prior to completion of the Certification process.
10385	INEEL Advanced Mixed Waste Treatment Project	By: Hampton, Jeremy			

Requirement Violated: MP-TRUW-8.5

Actions: Tag Applied: No
 Root Cause Analysis: No
 Responsible Manager: Harrawood, Ken
 Stop Work Order: No
 Root Cause Code: 3B = Inattention to detail
 # of Tags: 0
 Is CAR Required: No
 Disposition Desc. / CAP: None listed.
 Supervisor Review By: Ken Harrawood, 9/23/2004
 QA Mgr Rev Sign By: Elvin Dumas, 9/24/2004

Comments: None

175	RF	9/22/2004	9/27/2004	OPEN	WIPP Related: Yes Location: 440 Bldg. Item I.D. # / Description: D59472 was headspaced too soon based on the data provided on the Container Age Criteria Verification Form. Nonconformance Description: D59472 was headspaced too soon based on erroneous data provided on the Container Age Criteria Verification Form (CAC). The form shows 0.75" for the rigid liner vent hole diameter when it should be 0.3". This represents a difference of 87 days for the required waiting period. The Allowable Sample Date should be 8/13/04 but the drum was sampled on 6/3/04 based on the CAC form provided.
2004-000590	Rocky Flats Environmental Technology Site	R. A. Eschenbaum			

Requirement Violated: PRO-1351-440-SWB

Actions: Immediate Actions Taken: Found during WEMS WIPP Verify.
 Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No
 Responsible Manager (RM): R. J. Ballenger, Signature date 9/22/04.
 Final Disposition: Scrap data from the data package HGAS-DP-01022 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: 10/15/04.

Comments: None

NCR Number: CBFO Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
176 2004-000591	RF Rocky Flats Environmental Technology Site	9/22/2004 By: R. A. Eschenbaum	9/27/2004	OPEN	WIPP Related: Yes Location: 440 Bldg. Item I.D. # / Description: D75715 has elevated hydrogen headspace and flammable VOC concentrations. Nonconformance Description: A compliant TRUPACT-II load cannot be created in E-TRAMPAC for D75715 due to elevated hydrogen headspace and flammable VOC concentrations. The rigid liner lid may not be punctured with a minimum 0.3" diameter hole as verified in previous HGAS sample operations performed 10/6/00. Requirement Violated: PRO-1351-440-SWB Actions: Immediate Actions Taken: Found during WEMS WIPP Verify. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No Responsible Manager (RM): R. J. Ballenger, Signature date 9/22/04. Final Disposition: Scrap data from the data package HVOC-DP-00366, GMSP-DP-00590 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. Re-HGAS of the drum is being handled via Waste NCR 04-0585. Scrap. Scheduled Completion Date: 10/15/04. Comments: None
177 2004-000592	RF Rocky Flats Environmental Technology Site	9/22/2004 By: R. A. Eschenbaum	9/27/2004	OPEN	WIPP Related: Yes Location: 440 Bldg. Item I.D. # / Description: D67965 was headspace sampled incorrectly on 6/24/04. Nonconformance Description: D67965 was headspace sampled incorrectly on 6/24/04. It had been previously sampled on 1/4/01 as a Type 6 – no rigid liner. On 1/21/01 the drum was RTR'd and a rigid liner was present. NCR 2004-000009 was written to void this data. When it was re-headspaced, there was no evidence in the traveler of why the first headspace was rejected so it was sampled as a Type 1A. Requirement Violated: PRO-1351-440-SWB Actions: Immediate Actions Taken: Found during WEMS WIPP Verify. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No Responsible Manager (RM): R. J. Ballenger, Signature date 9/22/04. Final Disposition: Scrap data from the data package HGAS-DP-01042 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. Re-HGAS of the drum is being handled via Waste NCR 04-1450 to ensure the rigid liner lid is punctured. Scrap. Scheduled Completion Date: 10/15/04. Comments: None
178 2004-000593	RF Rocky Flats Environmental Technology Site	9/22/2004 By: R. A. Eschenbaum	9/27/2004	OPEN	WIPP Related: Yes Location: 440 Bldg. Item I.D. # / Description: D73299 was headspace sampled incorrectly on 5/13/04. Nonconformance Description: D73299 was headspace sampled incorrectly on 5/13/04. The data provided on Appendix 4, Container for WIPP Characterization, showed the last headspace disturbance as 8/28/03 – V&A date. This date is actually the date that the drum was opened to remediate > 4 l. containers. This information caused the drum to be sampled as a Type 1A but there is no evidence the rigid liner lid has ever been vented. Requirement Violated: PRO-1351-440-SWB Actions: Immediate Actions Taken: Found during WEMS WIPP Verify. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No Responsible Manager (RM): R. J. Ballenger, Signature date 9/22/04. Final Disposition: Scrap data from the data package HGAS-DP-00994 and in WEMS. The data for this container will

<u>NCR Number:</u> CBFO Assigned	<u>Responsible Organization</u>	<u>Date Identified</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
<u>Site Assigned:</u>		<u>By:</u>			

still be acceptable for satisfying HGAS quality control requirements if it was used for this purpose. Re-HGAS of the drum is being handled via Waste NCR 03-0663-136 to ensure the rigid liner lid is punctured.
Scrap. Scheduled Completion Date: 10/15/04.

Comments: None

179	RF	10/13/2004	10/14/2004	OPEN	WIPP Related: Yes Location: 440 Item I.D. # / Description: The headspace data for D75714 needs to be voided. Nonconformance Description: Waste NCR 03-0813-002 was written on 8/7/03 against D75714 during headspace sampling for liner lid moving while the venting of the rigid liner lid was being drilled. The hole in the rigid liner lid could not be confirmed. The WNCR required the drum be opened to confirm whether a hole was present. Because it has taken so long to do the confirmation, it was decided to repack the drum leaving the rigid liner out of the repacked container. This means the HGAS data in HGAS-DP-00636 must be voided.
2004-000642	Rocky Flats Environmental Technology Site	R. A. Eschenbaum			

Requirement Violated: QAPJP Section B1-1

Actions: Immediate Actions Taken: Drum has been on hold since initial HGAS.
Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No
Responsible Manager (RM): R. J. Ballenger, Signature date 10/13/04.
Final Disposition: Void the data in HGAS-DP-00636 and in WEMS.
Scrap. Scheduled Completion Date: 11/30/04.

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

September 1, 2004 – September 30, 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 September 1 through September 30, 2004, there were no reportable approved document changes that affected performance criteria or data quality.