



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

January 6, 2005



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: CBFO 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 Nonconformance Reports (NCR) Summarization Report. The report lists site-generated NCRs received at CBFO during the period of November 24 through December 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 November 1 through November 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,



Dr. Inés R. Triay
Acting Manager

Enclosure

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



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
November 24, 2004 – December 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 November 24 through December 23, 2004, there were no reportable Nonconformance Reports (NCRs) identified by the TRU waste generator sites.

PLAN AND PROCEDURE CHANGE REPORT

November 1, 2004 – November 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 November 1 through November 30, 2004, there were nine reportable approved document change that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Central Characterization Project (CCP)*, the *Hanford Site*, and the *Idaho National Engineering and Environmental Laboratory/Advanced Mixed Waste Treatment Project (INEEL/AMWTP)*, and were approved by CBFO during November 2004.

Plan and Procedure Change Report

Start Date: 11/1/2004

End Date: 11/30/2004

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
04-2278	11/18/2004	CCP-TP-005, R14, Draft E, CCP Acceptable Knowledge Documentation	Clarified the process for updating the AK accuracy report & updated the prohibited items list.

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
04-2201	11/2/2004	WRP1-OP-0722, RB-3, TRU RWM Glovebox Automatic Mode Operation	Clarified limits for residual liquids, incompatible waste, & packaging materials.
04-2224	11/9/2004	WRP1-OP-0725, RC-9, TRU Sorting Glovebox Operation	Clarified limits for residual liquids & incompatible waste.
04-2223	11/9/2004	WMP-400, Section 7.1.8, R15, Transuranic Waste Transportation and Disposal Certification	Clarified prohibited item list for limits on liquids.

Plan and Procedure Change Report

Start Date: 11/1/2004

End Date: 11/30/2004

04-2227

11/9/2004

WMP-400, Section 7.1.10, R6, TRU Waste Visual
Examination Technique

Clarified prohibited items list for corrosives & limits
for residual liquids.

INEEL AMWTP

Tracking #	CBFO Approval Date	Document Title	Change Description
04-2219	11/4/2004	MP-TRUW-8.5, R10, TRU Waste Certification	Clarified the following: * Reporting waste material parameter weights in WWIS * That the procedure is used for overpacking only * Inclusion of solids data in batch data reports when applicable. Added step to verify accuracy of WWIS entries.

Plan and Procedure Change Report

Start Date: 11/1/2004

End Date: 11/30/2004

04-2251

11/12/2004

MP-TRUW-8.11, R8, Data Reconciliation

Separated manual & electronic data reconciliation process.

Clarified the following:

- * Statistical sampling verification
- * Use of UCL90 results for miscertifications & appropriate hazardous waste number assignments
- * TIC determinations & reporting
- * Assigning containers to a waste stream or waste stream lot.

Added the following:

- * Step for reconciliation of new DAC evaluations
- * Steps to ensure normal distribution has been applied before performing calculations
- * Steps to ensure the required number of samples were collected & randomly chosen
- * Steps to ensure the characterization data confirms the AK regarding physical form, waste material parameters, & hazardous constituents
- * Steps to ensure the SQAQO has completed the NCR evaluation for the lot before performing calculations.

04-2285

11/23/2004

MP-TRUW-8.25, R8, RCRA Statistical Sampling

Clarified the following:

- * The process for determining the number of required samples
- * The random selection process and documentation thereof
- * That calculations will include a test for normal distributions and transformations made when necessary.

Added the following:

- * Steps to allow for calculations on a lot basis
- * Steps to allow for reduced headspace gas sampling, when applicable
- * Columns to data summary tables to show maximum, RTL, PRQL, & hazardous waste numbers.

Removed chloromethane from the compound list for VOCs in thermally treated waste.

Plan and Procedure Change Report

Start Date: 11/1/2004

End Date: 11/30/2004

04-2300

11/24/2004

INST-OI-43, R3B, HGAS Sampling and Analysis
Operations

Clarified the following:

- * Criteria for DAC
- * Training requirements
- * WAP QA/QC criteria
- * Online vs. analytical BDRs
- * ITR responsibilities
- * NCR process
- * Depth of needle insertion
- * DQOs for HSG.

Added the following:

- * Steps to ensure filter vents are covered prior to sampling
- * Use of additional sampling port
- * Corrected RSD to less than or equal to 25%.