



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
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February 25, 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

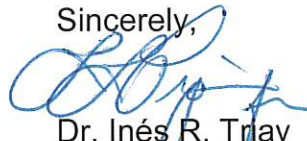
Dear Mr. Zappe:

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 January 24 through February 23, 2005. It is transmitted pursuant to the requirements contained in the Waste Isolation Pilot Plant ((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 January 1 through January 31, 2005. 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. Tray
 Acting Manager

Enclosure

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

*ED denotes electronic distribution



Mr. Steve Zappe

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February 25, 2005

bcc: w/enclosure

L. Chism, CBFO *ED

D. Miehl, CBFO ED

M. Navarrete, CBFO ED

J. Plum, CBFO ED

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CBFO QA File

CBFO M&RC

WIPP Operating Record, MS 486-06

*ED denotes electronic distribution

MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
January 24, 2005 – February 23, 2005

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 January 24 through February 23, 2005, there was one reportable Nonconformance Report (NCR), generated by 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 = 1/24/2005

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

Earliest End Date = 2/23/2005

<u>NCR Number:</u> <u>CBFO Assigned</u> <u>Site Assigned:</u>	<u>Responsible</u> <u>Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR</u> <u>Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
182 2005-000018	RF Rocky Flats Environmental Technology Site	1/20/2005 R.A. Eschenbaum	1/25/2005	OPEN	<p>WIPP Related: Yes Location: 440 Item I.D. # / Description: The headspace data for four drums needs to be voided. Nonconformance Description: Four drums – DD9804, DD9870, DD9871 and DD9836 – were headspace sampled as S5000 instead of the S3000 that they are. There is a difference in Drum Age Criteria between the Waste Streams.</p> <p>Requirement Violated: QAPJP Section B1-1</p> <p>Actions: Immediate Actions Taken: Drum has been on hold since initial HGAS. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: Yes Responsible Manager (RM): R. J. Ballenger, Signature date 1/20/05. Final Disposition: Void the data in the batch data reports listed below and in WEMS. *DD9871 done on 2/11/04 in HGAS-DP-00886 *DD9804 done on 2/12/04 in HGAS-DP-00888 *DD9836 done on 2/23/04 in HGAS-DP-00898 *DD9870 done on 2/26/04 in HGAS-DP-00902</p> <p>Scrap. Scheduled Completion Date: 2/15/05.</p> <p>Comments: None</p>

PLAN AND PROCEDURE CHANGE REPORT

January 1, 2005 – January 31, 2005

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 January 1 through January 31, 2005, there were six 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)* and the *Idaho National Engineering and Environmental Laboratory/Advanced Mixed Waste Treatment Project (INEEL/AMWTP)*, and were approved by CBFO during January 2005.

Plan and Procedure Change Report

Start Date: 1/1/2005

End Date: 1/31/2005

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
05-0138	1/13/2005	CCP-PO-001, R9, Draft D, CCP TRU Waste Characterization Quality Assurance Project Plan	<p>Clarified the following:</p> <ul style="list-style-type: none">*Field reference acceptance criteria,*Determining the number of drums for totals analysis,*QAOs for S3000 waste,*Sampling batch. <p>Added the following:</p> <ul style="list-style-type: none">*Requirements for sampling LANL sealed sources,*DAC for 85-gal, 100-gal drums & TDOPs,*DAC for packaging configuration Groups 7 & 8.

INTEL AMW-EP

Tracking #	CBFO Approval Date	Document Title	Change Description
05-0105	1/7/2005	INST-OI-16, R1,7C, Drum Coring Operations & Forms 1215 R1A & 1599, R0A	<p>Clarified the following:</p> <ul style="list-style-type: none">*Definition of liquids,*NCR process for unpunctured liners,*Sample location selection,*Initiation of chain of custody for coring samples. <p>*Added the following steps:</p> <ul style="list-style-type: none">*For obtaining co-located core samples,*For re-sampling when <50% recovery is obtained,*To ensure proper documentation of filter removal,*To ensure cleanliness of coring tools.
05-0112	1/8/2005	INST-OI-34, R10C, Visual Examination Operating Procedures and Data Reporting and Form 1312, R3C	<p>Clarified the following:</p> <ul style="list-style-type: none">*Prohibited items,*Layers of packaging,*Proper venting,*Recording material parameter weights,*Verification of waste matrix codes & waste stream description,*Need for reevaluation of AK when material parameters differ,*Daily scale checks,*Initiation of the NCR process.

Plan and Procedure Change Report

Start Date: 1/1/2005

End Date: 1/31/2005

05-0123	1/10/2005	MP-TRUW-8.9, R10D, Level II Data Validation & Forms 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401 & 1609	Clarified the following: *The Forms (checklists) to be included in batch data reports, *Prohibited items list, *Initiation of the NCR process, *Verification of QC checks, *Verification of hand calculations, *Appropriate DAC application, *Sampling & analytical QAOs, *Verification that the WMC and waste stream description match the physical form.
05-0136	1/12/2005	MP-TRUW-8.19, R6B, RTR/VE Drum Selection	Clarified the annual summary category group misclassification rate calculation.
05-0146	1/13/2005	INST-OI-12, R19B, Real Time Radiography Operations	Clarified the following: *Audio portion of RTR operation is descriptive of the waste being observed, *Video/audio quality is acceptable, *Replicate scan requirements, *Independent observation requirements, *NCR process, *Verification of physical form, *Definition of liquids.