



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

March 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

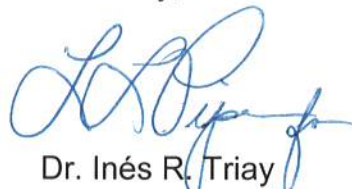
Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Field Office (CBFO) Monthly Nonconformance Summarization Report. The report lists site-generated Nonconformance Reports (NCRs) received at CBFO during the period of February 24 through March 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 February 1 through February 28, 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. Triay
 Acting Manager

Enclosure

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



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS

February 24, 2005 – March 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 (DOOs).

During the period of February 24 through March 23, 2005, there were six reportable Nonconformance Reports (NCRs), generated by the *Idaho National Laboratory/Advanced Mixed Waste Treatment Project (INL/AMWTP)*, the *Savannah River Site/Central Characterization Project (SRS/CCP)*, 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 = 2/24/2005

Earliest End Date = 3/23/2005

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
183	IA	2/22/2005	2/24/2005	2/24/2005	Title: Plywood spacers incorrectly recorded as waste. Affected Item: BN835 Mound Waste Category: WIPP Data Batch #: RTR04-00079, RTR04-00160, RTR04-00163, RTR04-00164, RTR04-00243, RTR04-00251 Container ID: 10001521, 10001524, 10001525, 10001527, 10001547, 10001659, 10001665, 10001667, 10001675, 10001689, 10001694, 10001701, 10001703, 10011369, 10021963
12608	INL Advanced Mixed Waste Treatment Project (formerly INEEL)	Zbryk, Kathy			

Description of Condition: The identified containers in the subject batches have plywood spacers incorrectly identified as waste rather than packaging material.
 Building: WMF 634
 Root Cause Code: 4D = Drawing, specification, or data errors
 Quality (Type Material): WIPP Batch-RTR

Requirement Violated: Requirement Violated: AK Source Document C269A
 PAAA Applicable: Yes; PAAA App Standard: 10CFR830; PAAA Reportable: No

Actions: Responsible Manager: Carpenter, Steve
 Responsible Department: Operations; Operations Group: TRU Program
 Tag Applied: No
 Root Cause Analysis: No
 Stop Work Order: No
 Is CAR Required: Yes
 Disposition Desc. / CAP: This NCR records the "use as is" disposition regarding this NCR. AK Source document C269A correctly identifies plywood spacers as packaging material and those spacers should not have been recorded as waste. No other parameters are affected by this change in description. This disposition was discussed with M. Clapham on 2-10-05 (1657) and he agrees with the disposition in that the change in description of the plywood will not affect other parameters associated with this waste.
 K. Zbryk, 2/22/05

Update by M. Clapham, 2/22/05

With regard to the NDA measurements of these drums, the reported results are not affected by the categorization of the Plywood spacers. To this end the reported activities and masses for the various reported isotopes are correct. The change in categorization would have an impact on the net weight assigned to the waste and, therefore, would affect the reported TRU alpha activity concentration. However, this change is small in all cases. A review of the 15 drums listed in this NCR indicates that the plywood spacers account for either 7lb or 14lb depending on whether one or two are used. The overestimate in net weight, due to the incorrect identification of the plywood spacers as waste rather than packaging, ranges from 2.7% to 5.9%. This means that the TRU alpha activity values for these 15 containers should, in fact, be between 2.7% and 5.9% higher than the values reported.

Since each of these containers has a TRU alpha activity that is significantly greater than 100nCi/g, and if the slight net weight anomaly identified in this NCR were fixed the TRU alpha activities would be increased, it seems reasonable to use the results "as-is".

QA disposition review comments:
 The use as is and justification is concurred with for these batches and containers only. This acceptance does not apply to any other additional RTR Batches or containers identified with this same issue, which must be reported and evaluated on an individual basis. Corrective action report 12625 has been issued to address actions to preclude

<u>NCR Number- CBFO Assigned</u>	<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>				

recurrence of this error. No further action is required for this NCR.
E. Dumas, 2/24/05

Supervisor Review By: Steve Carpenter, 2/23/2005
QA Mgr Rev Sign By: Elvin Dumas, 2/23/2005
Mgr Disp App By: Steve Carpenter, 2/23/2005
QA Mgr Rev Disp Sign By: Elvin Dumas, 2/24/2005
QA Verification Complete By: Elvin Dumas, 2/24/2005

Comments: None

184	IA	3/8/2005	3/8/2005	OPEN	Title: Plywood spacers incorrectly recorded in waste. Affected Item: BN835 Mound Waste Category: WIPP Data Batch #: RTR05-00041 Container ID: 10022194
12836	INL Advanced Mixed Waste Treatment Project (formerly INEEL)	McKenna, Tim			

Description of Condition: Container 10022194 in batch RTR05-00041 has a plywood spacer that has been incorrectly identified as waste rather than packaging material. This batch has been promoted through SPM.
Root Cause Code: 4D = Drawing, specification, or data errors
Quality (Type Material): WIPP Batch-RTR

Requirement Violated: Requirement Violated: AK Source Document C269A
PAAA Applicable: Yes; PAAA App Standard: 10CFR830; PAAA Reportable: No

Actions: Responsible Manager: Carpenter, Steve
Responsible Department: Operations; Operations Group: TRU Program
Tag Applied: No
Root Cause Analysis: No
Stop Work Order: No
Is CAR Required: Yes

Supervisor Review By: Elvin Dumas, 3/8/2005
QA Mgr Rev Sign By: Elvin Dumas, 3/8/2005

Comments: None

185	CS	3/15/2005	3/16/2005	OPEN	Batch Data Report # 042704A2 Drum # BFL02029 Condition: The drum was sampled by HSG based on the original vent date and calculated DAC compliant sample date. However, the vent date and DAC compliant sample date were revised based on new information which voids the HSG sample. Significant Condition: No. Recurring Condition: No.
NCR-SRS- 0515-05	Savannah River Site / CCP	William Johnson			

Requirement Violated: CH-TRAMPAC document Rev. 2 requires that before headspace gas sampling if performed, the Drum Age Criteria (DAC) needs to be met. This is also a WAC requirement.

Actions: Hold tag applied: Yes.
Trend Code: K.
Interim Disposition: N/A.
Final Disposition: Rework; Re-run drum through HSG.
Final Disposition Approvals: Responsible Manager, Steve Rose, signature date 3/15/05; SPQAO/FQAO, Dean Mooney, signature date 3/15/05.

<u>NCR Number: CBFO Assigned</u>	<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>			

Comments: None

186	RF	3/15/2005	3/17/2005	3/17/2005	WIPP Related: Yes Location: 440 Item I.D. # / Description: : The headspace data for D15406 needs to be voided. Nonconformance Description: D15406 was headspaced on 2/8/05 as a Type 1B, which is for vented rigid liner. It does have a rigid liner that had been confirmed as non-vented. This means the HGAS data in HGAS-DP-01149 must be voided.
2005-000073	Rocky Flats Environmental Technology Site	R. A. Eschenbaum			

Requirement Violated: QAPJP

Actions: Immediate Actions Taken: Found during certification.
Validation: Significance Lvl: Not indicated; Operability Eval Required: Not indicated; Generic Implications: Not indicated.

Responsible Manager (RM): Eric D'Amico, Signature date 3/15/05.
Final Disposition: Void the data in HGAS-DP-01149 for D15406 and in WEMS.
Scrap. Scheduled Completion Date: 3/30/05.

RESULTS:

Disposition Performance Results: Acceptable; Supporting Information: Reviewed Batch Data Report. Results Verified: F. J. Grady, Signature date: 3/16/05.

CLOSURE:

Comments: The headspace data associated with D15406 have been voided in HGAS-DP-01149 and in WEMS (see attached WEMS Samples form). The PQAO or designee will verify insertion of this NCR in HGAS-DP-01149. This verification will be performed during Project Level Validation IAW PRO-940-WIPP-010.

Final QA Review by: J. C. Tressell, 3/17/05.

Trend Code: WST-COM29.

Comments: None

187	RF	3/17/2005	3/17/2005	OPEN	WIPP Related: Yes Location: 559 Item I.D. # / Description: : Procedure L-4035-N ICN-03, Appendix C: Technical Supervisor Review checklist for batch data report MTLs-DP-00045 was not completely filled out. Nonconformance Description: The Technical Supervisor signed the checklist and circled "Yes" for "OK to Release?" but neglected to fill out the rest of the checklist (items a. through h.). The batch data report went through project level review before this was noted.
2005-000076	Rocky Flats Environmental Technology Site	Renee M. Estelle			

Requirement Violated: QAPJP Section B3-10a(2), Technical Supervisor Review

Actions: Immediate Actions Taken: None
Validation: Significance Lvl: Low; Operability Eval Required: No; Generic Implications: No.

Responsible Manager (RM): Eric D'Amico, Signature date 3/15/05.
Final Disposition: A qualified Technical Supervisor will review MTLs-DP-00045 and complete and sign the Technical Supervisor Review Checklist.

Rework. Scheduled Completion Date: 3/29/05.

Comments: None

<u>NCR Number:</u> <u>CBFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
188	IA	3/17/2005	3/23/2005	OPEN	Title: Vent Date Incorrect for 10013358 Affected Item: 10013358 Category: WIPP Data Batch #: HSG04-00331 Container ID: 10013358
13078	INL Advanced Mixed Waste Treatment Project (formerly INEEL)	Tolman, Betty J.			

Description of Condition: Container 10013358 was assigned DAC scenario 1 on Form 1449, indicating the vent and sample occurred on the same date. However, the vent date is 17 Mar 03 and the sample date is 17 Mar 04. This discrepancy was discovered after HSG04-00331 had been validated through SPM signature release.
Root Cause Code: 4D = Drawing, specification, or data errors
Quality (Type Material): WIPP Batch-HSGS

Requirement Violated: MP-TRUW-8.8, Sect 4.6.1.5
PAAA Applicable: Yes; PAAA App Standard: 10CFR830; PAAA Reportable: No

Actions: Responsible Manager: Colby, Charles
Responsible Department: Operations; Operations Group: TRU Program
Tag Applied: No
Root Cause Analysis: No
Stop Work Order: No
Is CAR Required: Yes

Supervisor Review By: Steve Carpenter, 3/21/2005
QA Mgr Rev Sign By: Elvin Dumas, 3/23/2005

Comments: None

PLAN AND PROCEDURE CHANGE REPORT

February 1, 2005 – February 28, 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 February 1 through February 28, 2005, there were four 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 Laboratory/Advanced Mixed Waste Treatment Project (INL/AMWTP)*, and were approved by CBFO during February 2005.

Plan and Procedure Change Report

Start Date: 2/1/2005

End Date: 2/28/2005

CCP

Tracking #	CBFO Approval Date	Document Title	Change Description
05-0188	2/2/2005	CCP-TP-062, R11, Draft H, TRU Waste Visual Examination, Segregation, and Repackaging	Clarified QC criteria, training requirements for the VE technical supervisor, and updated list of prohibited items to the current WAP.
05-0733	2/24/2005	CCP-TP-093, R3, Draft M, CCP Sampling of TRU Waste Container	Incorporated changes to allow for sampling with various filters.
05-0732	2/24/2005	CCP-PO-001, R10, Draft C, CCP TRU Waste Characterization Quality Assurance Project Plan	Added requirements for Off-site Recovery (OSR) waste.

INST-AMWTP

Tracking #	CBFO Approval Date	Document Title	Change Description
05-0710	2/10/2005	INST-OL-43, R6B, HGAS Sampling and Analysis Operations	Added DAC for additional configurations.

Monday, March 14, 2005