



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 April 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 March 24 through April 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 March 1 through March 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,

Inés Triay
 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



Mr. Steve Zappe

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bcc: w/enclosure

L. Chism, CBFO *ED

D. Miehl, CBFO ED

M. Navarrete, CBFO ED

J. Plum, CBFO ED

L. Steven, WTS ED

A. Pangle, CTAC ED

CBFO QA File

CBFO M&RC

WIPP Operating Record, MS 486-06

*ED denotes electronic distribution

MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
March 24, 2005 – April 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 March 24 through April 23, 2005, there was one reportable Nonconformance Report (NCR), generated by the *Idaho National Laboratory/ Advanced Mixed Waste Treatment Project (INL/AMWTP)*, while characterizing waste at TRU waste generator sites.

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 3/24/2005

Earliest End Date = 4/23/2005

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

| <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> |
|---|---|--------------------------------------|------------------------------------|--------------------|--|
| 189 13961 | IA INL Advanced Mixed Waste Treatment Project (formerly INEEL) | 4/19/2005 Morse, Angie | 4/20/2005 | OPEN | <p>Title: Inadequate Identification of Prohibited Items Affected Item: 10019088 Category: WIPP Data Batch #: RTR04-00278 Container ID: 10019088 Quality (Type Material): WIPP Batch-RTR ESH & QA Element: 9 Control of Special Process Building: WMF 634</p> <p>Description of Condition: A review of the RTR Audio/Video record for container 10019088 determined that the examination of the container was inadequate. During RTR examination of Container 10019088, the Operator did not shake the drum as required by INST-OI-12 to enable verification of liquids through wave motion and indicated verbally on the A/V he is looking for liquid at the bottom of the drum. This Container is a Metal Debris waste and is not certified for WIPP, but has been through SPM validation.</p> <p>This NCR will document corrective actions to preclude recurrence and a CAR will not be required. E. Dumas, 4/20/05.</p> <p>Requirement Violated: INST-OI-12 PAAA Applicable: Yes; PAAA App Standard: 10CFR830; PAAA Reportable: No</p> <p>Actions: Supervisor Review By: Elvin Dumas, 4/20/2005 Responsible Manager: Harrawood, Ken Responsible Department: Operations; Operations Group: TRU Program Tag Applied: No Stop Work Order: No Is CAR Required: No WIPP Submittal Req'd?: Yes # of Tags: 0 Disposition Due Date: 5/11/2005</p> <p>QA Manager Review By: Elvin Dumas, 4/20/2005.</p> <p>Comments: None</p> |

PLAN AND PROCEDURE CHANGE REPORT

March 1, 2005 – March 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 March 1 through March 31, 2005, there were eleven reportable approved 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 *Hanford Site*, and the *Idaho National Laboratory/Advanced Mixed Waste Treatment Project (INL/AMWTP)*, and were approved by CBFO during March 2005.

Plan and Procedure Change Report

Start Date: 3/1/2005

End Date: 3/31/2005

CCP

| Tracking # | CBFO Approval Date | Document Title | Change Description |
|------------|--------------------|---|---|
| 05-0828 | 3/23/2005 | CCP-TP-131, R2, Draft H, CCP Manual Gas Sampling of TRU Waste Containers for the Entech/Agilent Analytical System | Changed to include new filter models and the processes for sampling Pipe Overpack Components. |
| 05-0846 | 3/29/2005 | CCP-TP-002, R14, Draft D, CCP Reconciliation of DQOs and Reporting Characterization Data | Incorporated changes in reference to the Sealed Source Program. |
| 05-0861 | 3/30/2005 | CCP-TP-005, R15, Draft F, CCP Acceptable Knowledge Documentation | Revised to incorporate AK requirements for sealed sources. |

Hanford

| Tracking # | CBFO Approval Date | Document Title | Change Description |
|------------|--------------------|---|---|
| 05-0738 | 3/1/2005 | LO-080-407, RI-0, Cleaning SUMMA Canisters for TRU Headspace Gas Sampling | Added use of new pressure manifold when cleaning Summa canisters. |

Plan and Procedure Change Report

Start Date: 3/1/2005

End Date: 3/31/2005

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|---------|-----------|--|--|
| 05-0755 | 3/2/2005 | TRU-OP-001, RB-1, Headspace Gas Samples of TRU Waste Containers | Changes relative to the calibrated equipment list; added section regarding compression of dart O-ring. |
| 05-0758 | 3/2/2005 | LA-523-410, RM-0, Determination of Volatile Organic Compounds in TRU/Mixed Waste Container Headspace | Changes to add an additional identical Gas Chromatograph/Mass Spectrometer to the program. |
| 05-0786 | 3/11/2005 | WRP1-OP-0729, RB-8, Visual Examination | Added information regarding PCBs. |
| 05-0825 | 3/22/2005 | WMP-400, Section 7.1.9, R17, Acceptable Knowledge Documentation Management | Added information on documentation regarding PCBs. |

INL AMWTP

| Tracking # | CBFO Approval Date | Document Title | Change Description |
|------------|--------------------|---|---|
| 05-0757 | 3/7/2005 | INST-OI-13, R20D, Drum Vent/Headspace Gas Sample Operations | Changes to allow performance of multiple CCVs due to poor analyte behavior; changes in support of software changes. |

Plan and Procedure Change Report

Start Date: 3/1/2005

End Date: 3/31/2005

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|---------|-----------|--|---|
| 05-0816 | 3/18/2005 | INST-OI-34, R11B, Visual Examination Operating Procedures and Data Reporting | Changes regarding audio/video recording of VE check weight event. |
| 05-0844 | 3/29/2005 | MP-TRUW-8.13, R10A, Collection, Review, Confirmation, and Management of Acceptable Knowledge Documentation | Added information on documentation regarding PCBs. |