



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
June 27, 2005

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: 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 May 24 through June 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 May 1 through May 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. 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**  
**May 24, 2005 – June 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 May 24 through June 23, 2005, there were four reportable Nonconformance Reports (NCRs), generated by the *Los Alamos National Laboratory/Central Characterization Project (LANL/CCP)* and the *Hanford Site*, while characterizing waste at TRU waste generator sites.

**List of ALL Reportable NCRs Between the following Dates**

Latest Start Date = 5/24/2005

Earliest End Date = 6/23/2005

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 Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
190 NCR-LANL-0528-05, Rev. 0	CL Los Alamos National Laboratory / CCP	5/27/2005 Michael Gerle	5/27/2005	OPEN	<p>Process: HSG Batch Data Reports: LA04-HGAS-LA-001 and LA04-HGAS-LS-001 Drum #s 59075 and 59315 Actual Condition: The drums were sampled with &gt;4 liter sealed containers. Trend Code: B Recurring Condition: No</p> <p><b>Requirement Violated:</b> CCP-PO-001, Rev. 11, B1-1a(3) CCP-TP-131, Rev. 2, 2.6.1[A.2]</p> <p><b>Actions:</b> Hold Tag Applied: Yes SPQAO/FQAO Validation: Dean Mooney, 5/27/05. Interim Disposition: N/A Final Disposition: Reject Technical Disposition: N/A Disposition (Required for "Reject" and "Scrap"): Data is rejected in batch for drums 59075 and 59315. Headspace gas sampling to be redone. Final Disposition Approvals: Responsible Manager Michael Gerle, 5/27/05 and SPQAO/FQAO Dean Mooney, 5/27/05. Closure pending.</p> <p><b>Comments:</b> None</p>
191 NCR-LANL-0530-05, Rev. 0	CL Los Alamos National Laboratory / CCP	6/7/2005 Michael Gerle	6/8/2005	OPEN	<p>Process: HSG Batch Data Reports: LA04-HGAS-LA-001 and LA04-HGAS-LS-001 Drum #59404 Actual Condition: The drum was sampled with &gt;4 liter sealed container. Trend Code: B Recurring Condition: No</p> <p><b>Requirement Violated:</b> CCP-PO-001, Rev. 11, B1-1a(3) CCP-TP-131, Rev. 2, 2.6.1[A.2]</p> <p><b>Actions:</b> Hold Tag Applied: Yes SPQAO/FQAO Validation: Dean Mooney, 6/7/05. Interim Disposition: N/A Final Disposition: Reject Technical Disposition: N/A Disposition (Required for "Reject" and "Scrap"): Data is rejected in batch for drum 59404. Headspace gas sampling to be redone. Final Disposition Approvals: Responsible Manager Michael Gerle, 6/7/05 and SPQAO/FQAO Dean Mooney, 6/7/05. Closure pending.</p> <p><b>Comments:</b> None</p>

<u>NCR Number:</u> <u>CBFO 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>
192 NCR-LANL- 0531-05, Rev. 0	CL Los Alamos National Laboratory / CCP	6/16/2005 Michael Gerle	6/17/2005	OPEN	Process: HSG Batch Data Reports: LA05-HGAS-LS-031 and LA05-HGAS-LA-031 Drum #S871882 Actual Condition: The drum was sampled prior to meeting the Drum Age Criteria. Drum S871882 has a 25-day DAC. The drum filter was changed on 5/12/05; however, no record of this change out was provided to AK or HSG prior to sampling on 5/31/05. Trend Code: K Recurring Condition: No  <b>Requirement Violated:</b> CCP-TP-131, Rev. 2, 2.6.1 [A.2] and 2.6.2 [A.1] CCP-TP-129, Rev. 2, 4.2.1 [B.4], [C.3], and [D.4]  <b>Actions:</b> Hold Tag Applied: Yes SPQAO/FQAO Validation: Pete Lindahl, 6/16/05. Interim Disposition: N/A Final Disposition: Reject Technical Disposition: N/A Disposition (Required for "Reject" and "Scrap"): Data is rejected in batch for drum S871882. Headspace gas sampling to be redone when DAC is met. Final Disposition Approvals: Responsible Manager Michael Gerle, 6/16/05 and SPQAO/FQAO Pete Lindahl, 6/16/05. Closure pending.  <b>Comments:</b> None

193 TRU-SPO- 05NCR-328, Rev. 1	RL Hanford Site	5/12/2005 SM Hailey	6/21/2005	OPEN	Actual Condition: Container data packages for the following containers were created with incorrect waste stream assignments. The incorrect waste stream information in the container data packages were used in the preparation and validation of the associated NDE batch data reports (BDRs). The errors were detected during performance of required waste certification activities.  <table border="1"> <thead> <tr> <th>CIN</th> <th>NDE BDR</th> <th>Container Data Package Waste Stream Assignment</th> <th>Correct Waste Stream Assignment</th> </tr> </thead> <tbody> <tr><td>A85003</td><td>WR-TB-2005-058</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85007</td><td>WR-TB-2005-055</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85035</td><td>WR-TB-2005-055</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85261</td><td>WR-TB-2005-055</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85263</td><td>WR-TB-2005-055</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85265</td><td>WR-TB-2005-055</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85266</td><td>WR-TB-2005-058</td><td>MPFPD</td><td>MPUREXD</td></tr> <tr><td>A85267</td><td>WR-TB-2005-055</td><td>MPFPD</td><td>MPUREXD</td></tr> </tbody> </table>	CIN	NDE BDR	Container Data Package Waste Stream Assignment	Correct Waste Stream Assignment	A85003	WR-TB-2005-058	MPFPD	MPUREXD	A85007	WR-TB-2005-055	MPFPD	MPUREXD	A85035	WR-TB-2005-055	MPFPD	MPUREXD	A85261	WR-TB-2005-055	MPFPD	MPUREXD	A85263	WR-TB-2005-055	MPFPD	MPUREXD	A85265	WR-TB-2005-055	MPFPD	MPUREXD	A85266	WR-TB-2005-058	MPFPD	MPUREXD	A85267	WR-TB-2005-055	MPFPD	MPUREXD
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**Requirement Violated:** WMP-400, Section 7.1.7, 4.1.1.5, Revision 15 requires the Acceptable Knowledge Data Collector to "Prepare the initial container data package including information deemed necessary to process the containers."

**Actions:** Site QA Officer Validation: S.L. Huggins, 6/15/05, for M.J. Horhota, 5/12/05.  
Interim Disposition: N/A (See Final Disposition).  
Final Disposition: Use-As-Is  
Technical Justification (Required for Use-As-Is and "Repair"): A review of the impact of the data determined there was no adverse effect to the certification data quality.  
The Headspace Gas Batch Data Reports (BDRs) reflected the correct waste stream information. The NDA BDRs require only administrative changes for waste stream identification as valid isotopic information was used.  
The NDE BDRs require only administrative changes as NDE waste streams, MPFPD and MPUREXD, are both S5490 category mixed waste streams.  
ECN #: N/A (See Technical Justification above).

<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>
					<p>Corrective Actions (Actions to Prevent Recurrence):</p> <ol style="list-style-type: none"> <li>1) Revise the AK Data Collector training program to include the historical facility numbering and waste stream delineation methodology. Actionee: S.W. Bisping - Due Date 8/1/05.</li> <li>2) Brief the AK Data Collectors on the importance of waste stream assignment. Actionee: S.W. Bisping - Due Date 7/5/05.</li> <li>3) Correct the travelers. Actionee: S.W. Bisping - Action Completed 5/12/05.</li> <li>4) Revise Batch Data Reports WR-TB-2005-055 and WR-TB-2005-058. Actionee: D.C. DeRosa - Due Date 8/1/05.</li> <li>5) Identify and correct NDA batch data reports as required. Actionee: D.C. DeRosa - Due Date 8/1/05.</li> <li>6) Evaluate and report the extent of the condition. Actionee: S.W. Bisping - Due Date 8/1/05.</li> <li>7) Close the NCR. Actionee: M.J. Horhota - Due Date 8/15/05.</li> </ol> <p>Final Disposition Approvals: Responsible Individual R. Dunn, TRU Program Director, 6/15/05; Site QA Officer S.L. Huggins for M.J. Horhota, 6/15/05; Other Signatures (as required) S.W. Bisping, AK Data Collector, 6/15/05 and D.C. DeRosa, TRU WIPP Certif. Lead, 6/15/05.</p> <p><b>Comments:</b> NCR received as hardcopy transmitted via Fluor Hanford letter dated 6/15/05 from R. Dunn to A. Holland, received at CBFO M&amp;RC on 6/21/05, Unique #0502463. Also transmitted via e-mail dated 6/23/05 from D. DeRosa to site.documents@wipp.ws. Not transmitted to wipp.notify@wipp.ws.</p>

## PLAN AND PROCEDURE CHANGE REPORT

May 1, 2005 – May 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 May 1 through May 31, 2005, there were two reportable approved document change that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Hanford Site* and the *Idaho National Laboratory/Advanced Mixed Waste Treatment Project (INL/AMWTP)*, and were approved by CBFO during May 2005.

# Plan and Procedure Change Report

Start Date: 5/1/2005

End Date: 5/31/2005

## Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
05-1137	5/19/2005	ZO-160-080, RC-14, Pipe-N-Go Operations	Clarified steps for recording parameter weights; clarified steps for describing the waste; updated PCB waste discussions to current WAP language; added clarification of prohibited item dispensation.

## INL AMWIP

Tracking #	CBFO Approval Date	Document Title	Change Description
05-1144	5/25/2005	INST-FOI-20, R13, Supercompactor and Post-Compaction Operations	Added steps for compaction of LLD drums and steps to ensure they are not certified to WIPP.