



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 September 3, 2008



Mr. Steve Zappe, Project Leader
 Hazardous Materials Bureau
 New Mexico Environment Department
 2905 E. Rodeo Park Drive, Building 1
 Santa Fe, New Mexico 87505-6110

Subject: Carlsbad Field Office Monthly Nonconformance Summarization Report

Dear Mr. Zappe:

Enclosed is the Carlsbad Field Office (CBFO) Monthly Nonconformance Summarization Report transmitted pursuant to the requirements contained in the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Section B3-13, *Nonconformance to DQOs*. The report lists site-generated nonconformance reports (NCRs) received at CBFO during the period of July 24 through August 23, 2008.

If you have questions or concerns, please contact CBFO Quality Assurance Manager, Ava L. Holland at (575) 234-7423.

Sincerely,

David C. Moody
 Manager

Enclosure

cc: w/o enclosure
 J. Kieling, NMED *ED
 J. Bearzi, NMED ED
 S. Holmes, NMED ED
 V. Daub, CBFO ED
 A. Holland, CBFO ED
 *ED denotes electronic distribution



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
July 24, 2008 – August 23, 2008

This summary is submitted pursuant to the requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Section B3-13, Nonconformance to DQOs.

During the period of July 24 through August 23, 2008, the Carlsbad Field Office received four reportable nonconformance reports, generated by the Hanford Site, the Oak Ridge National Laboratory Central Characterization Project (CCP) and the Idaho National Laboratory CCP.

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 7/24/2008

Earliest End Date = 8/23/2008

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
294 TRU-SPO- 08NCR-134	RL Hanford Site	7/9/2008 By: C. A. McNaughton	7/31/2008	OPEN	Drum RH-A-88-023, in NDE Batch No. WR-TB-2007-191, underwent Radiography and could not be fully examined because of lead rubber gloves, which are not penetrable. Note A: This is a follow on NCR to TRU-WRP-07NCR-115, which has been closed. The final disposition of the original NCR, which had a Use-As-Is disposition, was identified in TRU-SPO-08CAR-017 as lacking sufficient documentation to identify the contents of drum number RH-A-88-023 after repackaging (July 31, 2005). Requirement Violated: WRP1-OP-0908, step 5.4.21, requires 100% coverage of waste drums. Actions: None listed. CLOSURE PENDING. Comments: TRU-SPO-08NCR-134 (CBFO NCR# 294), initiated on 7/31/08, was transmitted to CBFO as part of the closure package for CBFO CAR 08-031 via electronic mail dated 7/31/08 from K. McDonald, DOE-RL, to M. Navarrete, CBFO, and via hardcopy Fluor Hanford letter dated 7/31/08 from R. Dunn to M. Navarrete, received at CBFO on 8/1/08, Unique #08002026.
295 NCR-ORNL- 0501-08, Rev. 1	CO Oak Ridge National Laboratory/Centr al Characterization Project	8/1/2008 Hillary J. Neely	8/3/2008	OPEN	The field reference standard that was taken as part of BDR ORHSGS080004 had recovery of all six analytes at less than 70 percent. Reason for revision: NCR did not include justification for not applying NCR tags to affected containers. Requirement Violated: CCP-PO-001, Rev. 16, Section B1-1b(3) states, "Field reference standard results shall be acceptable if the accuracy for each tested compound has a recovery of 70 to 130 percent." Actions: Final Disposition: Reject. Disposition Instructions: Void Sampling and Analysis BDR listed in Attachment 1 and resample containers. CLOSURE PENDING. Comments: NCR-ORNL-0501-08, Rev. 1 (CBFO NCR# 295), initiated on 8/3/08, was transmitted to CBFO via wipp.notify@wipp.ws on 7/16/08 by Irene Quintana, WTS/CCP. NCR-ORNL-0501-08, Rev. 0, initiated on 7/31/08 and superseded on 8/1/08, was included with the transmittal.
296 NCR-INL-0027- 08, Rev. 0	CI Idaho National Laboratory / Central Characterization Project	8/21/2008 Barbara Broomfield	8/21/2008	OPEN	Data sheets were corrected in Section 2 per NCR-INL-0017-08, and the totals at the end of Section 2 updated correctly. However, the corrections were necessary in Section 5, which was not updated. Thus, the total volume for the debris is incorrect in Section 5. Requirement Violated: CCP-TP-006 Rev. 12 Step 4.3.14 Verify the completeness and accuracy of the data and that the correct Waste Matrix Code has been entered on the CCP Waste Visual Examination Technique Data Form. [B] IF the data is incomplete or an inaccuracy is discovered THEN ensure VEOs make necessary changes to the CCP Waste Visual Examination Data Form datasheet in accordance with CCP-QP-008. Actions: Final Disposition: Rework. Instructions for Completion of Final Disposition: Update Section 5 of the datasheets for ARP06750 to show the corrected volume for the debris waste. BDR to be reviewed by DGL and submitted to records. Corrective Actions: VE Operators and Leads to be instructed in revisions to sections of the data spreadsheet for waste weights and volumes.

<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>			
					CLOSURE PENDING.
					<u>Comments:</u> NCR-INL-0027-08, Rev. 0 (CBFO NCR# 296), initiated on 8/21/08, was transmitted as a five-day notification to CBFO via wipp.notify@wipp.ws on 8/21/08 by Michael Valentine, WTS/CCP, and as a 30-day NCR submittal by Michael Valentine, WTS/CCP.
297	CI	8/21/2008	8/21/2008	OPEN	A number of errors were identified during Project Level Validation and Verification of VE BDR IN-ARP-VE-000842 that the ITR failed to recognize.
NCR-INL-0513-08, Rev. 0	Idaho National Laboratory / Central Characterization Project	Michael Valentine			<p>ARP07224 - Page 62A was not properly identified as a superseded page, but the change was signed by two VE operators, the VE Lead, and the first ITR. The correction to mark the page as superseded was made after the first ITR review but only one of the VE operators signed for the change when the BDR was reviewed and approved by the second ITR. The second VE operator and the VE Lead then signed for the change after the second ITR review. Thus, there were VE operator and VE Lead signatures dated after the ITR signature when the BDR was submitted to records for the SPM review.</p> <p>ARP07207 - Page 75 was superseded with a page that contained errors resulting in a doubling of weight and volume for cellulosic waste in Section 2 of the data form. This error was not identified by the VE operators and VE Leads signing for the change nor was the error identified during the first and second ITR review.</p>
					<u>Requirement Violated:</u> CCP-TP-006 Rev. 12 Step 4.3.14 Verify the completeness and accuracy of the data and that the correct Waste Matrix Code has been entered on the CCP Waste Visual Examination Technique Data Form. [B] IF the data is incomplete or an inaccuracy is discovered THEN ensure VEOs make necessary changes to the CCP Waste Visual Examination Data Form datasheet in accordance with CCP-QP-008.
					<u>Actions:</u> Final Disposition: Rework. Instructions for Completion of the Final Disposition: Perform corrections to errors identified in section 7(c) for IN-ARP-VE-000842. The BDR will be reviewed by DGL and submitted to records. Corrective Actions: VE personnel will be briefed on the importance of making corrections properly and identifying consequent changes needing to be made.
					CLOSURE PENDING.
					<u>Comments:</u> NCR-INL-0513-08, Rev. 0 (CBFO NCR# 297), initiated on 8/21/08, was transmitted to CBFO via wipp.notify@wipp.ws on 8/21/08 by Michael Valentine, WTS/CCP.