



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



October 27, 2008

**CERTIFIED MAIL-RETURN RECEIPT**

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

Subject: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports

Dear Mr. Zappe:

Enclosed is the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports (NCRs), 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 NCRs received at CBFO during the period of September 24 through October 23, 2008.

An electronic version of this documentation is included as a courtesy for use by NMED, but is not to be regarded as the formal submittal.

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have questions or concerns, please contact Mr. Dennis S. Miehl, CBFO Acting Quality Assurance Manager, at (575) 234-7491.

Sincerely,

David C. Moody  
Manager

Enclosure



Mr. Steve Zappe

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October 27, 2008

cc: w/enclosure

J. Kieling, NMED \*ED

J. Bearzi, NMED ED

S. Holmes, NMED ED

V. Daub, CBFO ED

D. Miehl, CBFO ED

CBFO QA File

CBFO M&RC

RCRA Operating Record, MS 452-09

\*ED denotes electronic distribution

**List of All Reportable NCRs Between the following Dates:**

Latest Start Date = 9/24/2008

Earliest End Date = 10/23/2008

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

NCR Number: CBFO Assigned	Responsible Organization	Date Identified By:	Date NCR Received	Date Closed	Deficiency
299 NCR-INL-0515-08, Rev. 0	CI Idaho National Laboratory / Central Characterization Project	10/2/2008 Michael Valentine	10/6/2008	10/6/2008	<p>The ITR checklist for IN-ARP-VE-000719 was not completed or signed. The BDR was reviewed and approved by the SPM.</p> <p><b>Requirement Violated:</b> CCP-TP-006 Rev 12, CCP Visual Examination Technique for INL Newly Generated TRU Waste Retrieved From Pits 4.5 ITR                      4.5.1 Review the BDR to the criteria in Attachment 2, AND document on Attachment 2.                      4.5.2 IF NO comments are necessary when completing Attachment 2, THEN record NA in the comments section of Attachment 2.                      4.5.3 Print name, sign, AND date Attachment 2.                      4.5.4 Review Attachment 4 for completeness AND print name, sign, and date.</p> <p>CCP-TP-001 Rev. 17, CCP Project Level Data Validation and Verification                      4.2.5 Verify that the DGL ITR reviews, validations, and verifications have been performed as evidenced by the completed review checklist and appropriate signature release.</p> <p><b>Actions:</b> Final Disposition: Rework.                      Instructions for Completion of the Final Disposition: ITR to re-review the BDR and generate a completed, signed ITR checklist. BDR will be validated by an SPM other than the one that performed the original review.                      Corrective Actions: All SPMs briefed on importance of complete and thorough reviews.</p> <p>Final Disposition Verified - NCR Closed [Signature]: Christine Gomez, CCP QA Engineer, 10/6/08.</p> <p><b>Comments:</b> NCR-INL-0515-08, Rev. 0 (CBFO NCR# 299), initiated on 10/2/08, was transmitted to CBFO via wipp.notify@wipp.ws on 10/6/08 by Michael Valentine, WTS/CCP.</p>
300 NCR-INL-0035-08, Rev. 0	CI Idaho National Laboratory / Central Characterization Project	10/13/2008 Bill Verlanic	10/17/2008	10/15/2008	<p>After performing solid sampling, it was found that the wrong quadrant was used to obtain the sample from the tray.</p> <p><b>Requirement Violated:</b> CCP-TP-008 REV 6, 4.2.4 Record the Assigned Tray Quadrant for the sample number from Table 1, Identification of Assigned Tray Quadrant for Each Sample of Soil and Sludge on Attachment 1 (Item 13).</p> <p><b>Actions:</b> Final Disposition: Use-As-Is                      Technical Justification: The purpose of the random selection of a tray quadrant for the sampling event is to ensure that the operator taking the sample is not subjectively influenced by physical characteristic variations or other observable differences between tray quadrants when choosing a sampling location. Thus the unintentional error resulting in the inadvertent selection of the incorrect quadrant, the representative character of the sample is not affected per Tom Gatliffe CCP Computational and Applied Mathematical Statistics. [sic]                      Instructions for Completion of the Final Disposition: N/A                      Corrective Actions: None.</p> <p>Final Disposition Verified - NCR Closed [Signature]: R. Czyzewski, CCP QA Engineer, 10/15/08.</p> <p><b>Comments:</b> NCR-INL-0035-08, Rev. 0 (CBFO NCR# 300), initiated on 10/13/08, was transmitted to CBFO via wipp.notify@wipp.ws on 10/17/08 by Michael Valentine, WTS/CCP.</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>
301 NCR-ALD-0001-08, Rev. 0	CI Idaho National Laboratory / Central Characterization Project	10/15/2008 Shelly J. Sailer	10/20/2008	10/16/2008	<p>Peak area for internal standard perylene-d12 (PRY) fails acceptance criteria for laboratory sample 10 8DW59 (field ID 10247684), analyzed 09/03/08 on instrument SV-8. The peak area for PRY in this sample is 626519 area units and the lower acceptance limit for this internal standard on 09/03/08 was 866254 area units. The sample was not reanalyzed neat or diluted and reanalyzed, as required by procedure.</p> <p><b><u>Requirement Violated:</u></b> CCP-TP-185, Revision 0, CCP Semivolatile Organic Compounds by Gas Chromatography/Mass Spectrometry, Step 8.2.1.3: "Reanalyze or dilute and reanalyze samples failing to meet these [internal standard area] criteria, depending upon the suspected cause of the internal standard failure."</p> <p><b><u>Actions:</u></b> Final Disposition: Use-As-Is            Technical Justification: For this sample, no target analytes or reported TICs are quantified using the subject internal standard.            The subject internal standard failure has been discussed in the Batch Data Report narrative.            Instructions for Completion of the Final Disposition: N/A            Corrective Actions: None.</p> <p>Final Disposition Verified - NCR Closed [Signature]: F. J. Dunhour, CCP QA Engineer, 10/16/08.</p> <p><b><u>Comments:</u></b> NCR-ALD-0001-08, Rev. 0 (CBFO NCR# 301), initiated on 10/15/08, was transmitted to CBFO via wipp.notify@wipp.ws on 10/20/08 by Michael Valentine, WTS/CCP.</p>