



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
November 25, 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 for November

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 October 24 through November 23, 2008.

An electronic version of this documentation is provided 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. Martin P. Navarrete, CBFO Acting Quality Assurance Manager, at (575) 234-7483.

Sincerely,

David C. Moody
Manager

Enclosure



Mr. Steve Zappe

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November 25, 2008

cc: w/enclosure

J. Kieling, NMED *ED

J. Bearzi, NMED ED

S. Holmes, NMED ED

V. Daub, CBFO ED

M. Navarrete, CBFO ED

CBFO QA File

CBFO M&RC

RCRA Operating Record, MS 452-09

*ED denotes electronic distribution.

MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
October 24, 2008 – November 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 October 24 through November 23, 2008, the Carlsbad Field Office received one reportable nonconformance report, generated by the Savannah River Site Central Characterization Project.

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 10/24/2008

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

Earliest End Date = 11/23/2008

<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>
302 NCR-SRS-0531-08, Rev. 0	CS Savannah River Site / Central Characterization Project	11/7/2008 Craig Simmons	11/10/2008	OPEN	<p>Batch Data Report #: SRHSGS080004 Container #: SR514733 The noted container was sampled per CCP-TP-093 using sampling scenario 2 with a permit required equilibrium time specified on CCP-TP-093, Attachment 2 specified as 25 days. To provide a sufficient DAC such that the container contents would have reached 90 percent steady state concentration within each layer of confinement, the drum should have been specified as sampling scenario 3, 175 days. The actual drum age for the container is 411 days and therefore sufficient to meet the longer DAC requirement.</p> <p>Requirement Violated: Per CCP-PO-001 (Rev. 16), CCP TRU Waste Characterization Quality Assurance Project Plan, Section B1-1a(1), the purpose of the drum age criteria (DAC) is to ensure that "container contents have reached 90 percent steady state concentration within each layer of confinement." Per CCP-TP-093 (Rev. 13), Sampling of TRU Waste Containers, and CCP-PO-001, containers that are packaged in an unvented condition and have met the criteria for Scenario 1 and then are vented, but not sampled at the time of venting are eligible to be sampled as Scenario 2. For drums that are purged rather than vented there is currently no direction to reclassify the drums as Scenario 3 and if sampled per Scenario 2 the DAC is not sufficient that the container contents would have reached 90 percent steady state concentration within each layer of confinement.</p> <p>Actions: Final Disposition: Use-As-Is Technical Justification: The actual drum age for the container is 411 days and therefore sufficient to meet the 175 day DAC requirement specified for sampling scenario 3. Instructions for Completion of the Final Disposition: N/A Corrective Actions: SRS is the only CCP site that has done purging. To prevent a recurrence, a standing order will be issued at SRS to direct that purging be used as a reason to designate that a drum be sampled as scenario 3 rather than scenario 2.</p> <p>Final Disposition Approvals: Responsible Manager/Individual [Signature] Craig Simmonds, 11/07/08 and CCP QA Engineer or Designee [Signature] Christine Gomez, 11/07/08.</p> <p>CLOSURE PENDING.</p> <p>Comments: NCR-SRS-0531-08, Rev. 0 (CBFO NCR# 302), initiated on 11/7/08, was transmitted to CBFO via wipp.notify@wipp.ws on 11/10/08 by Adela Cantu, WTS/CCP.</p>