



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

JUN 3 2010

CERTIFIED MAIL – RETURN RECEIPT

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: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports, May 2010

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 Data Quality Objectives (DQOs). The report lists site-generated NCRs received at CBFO during the period of May 1 through May 31, 2010.

An electronic version of this documentation is provided as a courtesy for use by the New Mexico Environment Department, 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 Ms. Ava L. Holland, CBFO Quality Assurance Director, at (575) 234-7423.

Sincerely,

David C. Moody
 Manager

Enclosure(s)

cc: w/enclosures

J. Kieling, NMED * ED
 J. Bearzi, NMED ED
 S. Holmes, NMED ED
 V. Daub, CBFO ED

A. Holland, CBFO ED
 WIPP Operating Record ED
 CBFO QA File
 CBFO M&RC

*ED denotes electronic distribution



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
May 2010

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 May 1 through May 31, 2010, the Carlsbad Field Office received four reportable nonconformance reports, generated by the Oak Ridge National Laboratory (ORNL)/Central Characterization Project (CCP), the Hanford Site/CCP, and the Los Alamos National Laboratory/CCP.

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 5/1/2010

Earliest End Date = 5/31/2010

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

NCR Number: CBFO Assigned Site Assigned:	Responsible Organization	Date Identified By:	Date NCR Received	Date Closed	Deficiency
347 NCR-ORNL-0513-10, Rev. 1	CO Oak Ridge National Laboratory / Central Characterization Project (CCP)	4/30/2010 Larry Porter	5/4/2010	OPEN	<p>Process: NDE Batch Data Reports: OR-RTR6-0084, OR-RTR6-0060, OR-RTR6-0056, OR-RTR6-0060, and OR-RTR6-0051 Container #s (correlating to above-listed BDRs): NFS0555, NFS0575, NFS0576, NFS0578, and NFS0581 Description of Nonconformance: Prohibited Item. CCP Hold Tags: Justification N/A. NCR Form indicates that CCP Hold Tags associated with the NCR have been applied.</p> <p>Actual Condition: The PVC spacer on drum NFS0555 does not have the 1/2" hole. The Spacer is over the hole in the liner but the filter is outside the spacer, so the diffusivity rate of this condition is unknown. Also, AK does not address the spacers in the packaging configuration. Drums NF20575, NFS0576, and NFS0581 do not have the rigid liner vented. Reason for revision: to add 4 other drums that have greater than four liter sealed containers.</p> <p>Reason for Revision: Added language associated with the Independent Observation as that was unknown at the time the original NCR was written.</p> <p>Does this NCR have the potential to impact AK: No Significant Condition: No Recurring Condition: No Trend Code: A</p> <p>Requirement Violated: CCP-TP-053, Rev. 7, Table 1, Prohibited Items, Sealed containers greater than 4 liters.</p> <p>Actions: CCP QA Engineer or Designee Validation [Signature] Laura Romero Jones, 5/3/10. Actions not indicated on NCR form; e-mail advises, "No actions defined yet."</p> <p>Comments: NCR-ORNL-0513-10, Rev. 1 (CBFO NCR# 347), initiated on 4/30/10, was transmitted to CBFO via wipp.notify@wipp.ws on 5/4/10 by Rich Kantrowitz, SPM, WTS/CCP. Note: at the time of this transmittal, actions had not yet been determined. Rev. 0 of this NCR was not included in this transmittal.</p>
348 NCR-RL-0505-10, Rev. 0	CR Hanford Site / CCP	5/10/2010 Veronica Waldram	5/10/2010	OPEN	<p>Process: VE Batch Data Report: RLVEPF0021 Container #: 0067509 Description of Nonconformance: Other. CCP Hold Tags: No justification listed. NCR Form does not indicate whether or not CCP Hold Tags associated with the NCR have been applied.</p> <p>Actual Condition: VE Operator changed raw data 7 days after the VE was performed without justification for the changes. It also appears that raw data was changed after the finalized data forms were signed off on 4/20/10. "Raw Data" was added to the BDR, personnel including the data did not initial and date the new information on the Table of Contents, nor was the raw data attached paginated.</p> <p>Does this NCR have the potential to impact AK: No Significant Condition: No (*This is currently being addressed by CBFO CAR 10-019. CG, 5/10/10) Recurring Condition: No Trend Code: D</p>

<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>
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Requirement Violated: CCP-PO-001, Revision 17, Section B3-10a states, "All data are transferred and reduced from field and laboratory records completely and accurately." It also states, "All changes to original data are lined out, initialed, and dated by the individual making the change. A justification for changing the original data may also be included. Original data are not obliterated or otherwise disfigured so as to be unreadable. Data changes are made only by the individual who originally collected the data, or by an individual authorized to change the data."

CCP-TP-113, Revision 13, Attachment 3, Question 8, states "BDR contents are complete and match the CCP Waste VE Batch Data Report Table of Contents?"

Actions: CCP QA Engineer or Designee Validation [Signature] Christine M. Gomez, 5/10/10.
 Interim Disposition: N/A
 Instructions for Completion of the Interim Disposition, Interim Disposition Approvals, and Completion of Interim Disposition: Not indicated on NCR form.
 Final Disposition: Reject
 Technical Justification: N/A
 Disposition Instructions: Container will be examined through RTR.
 Instructions for Completion of the Final Disposition: N/A
 Actions to Prevent Recurrence: N/A
 Final Disposition Approvals: Responsible Manager/Individual [Signature] Veronica Waldram, 5/10/10, and CCP QA Engineer or Designee [Signature] Christine M. Gomez, 5/10/10.

CLOSURE PENDING.

Comments: NCR-RL-0505-10, Rev. 0 (CBFO NCR# 348), initiated on 5/10/10, was transmitted to CBFO via wipp.notify@wipp.ws on 5/10/10 by Veronica Waldram, WTS/CCP.

349	CL	5/12/2010	5/13/2010	OPEN	<p>Process: HSG Batch Data Reports: LAHSGS100001, ECL10001G, and ECL10001M Container #s: 56516, 62046, S813887, S820648, S844113, S844387, S844388, and S844652 Description of Nonconformance: Other. CCP Hold Tags: N/A. Data was revised and no further action is necessary.</p> <p>Actual Condition: Although two personnel signed the canister tags, only one sampler's signature was collected in the Chain of Custody Form. This item was found during the Annual Re-Certification Audit and CBFO CAR 10-027 was issued.</p> <p>Does this NCR have the potential to impact AK: No Significant Condition: No Recurring Condition: No Trend Code: A</p> <p>Requirement Violated: CCP-TP-093, Rev. 13, CCP Sampling of TRU Waste Containers, Section 4.5.5[Q] Enter the following data for each container sample on Attachment 1: [Q.8] Sampler's Signature.</p> <p>Actions: CCP QA Engineer or Designee Validation [Signature] Mark Weaver, 5/12/10. Interim Disposition: N/A Instructions for Completion of the Interim Disposition, Interim Disposition Approvals, and Completion of Interim Disposition: Not indicated on NCR form. Final Disposition: Rework Technical Justification: N/A Disposition Instructions: N/A Instructions for Completion of the Final Disposition: 1. Revise COC to match sampler's actions.</p>
NCR-LANL-0507-10, Rev. 0	Los Alamos National Laboratory / CCP	S. M. Peterman			

<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>
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2. Other actions will be tracked under CBFO CAR 10-027.
 Actions to Prevent Recurrence: N/A
 Final Disposition Approvals: Responsible Manager/Individual [Signature] S. M. Peterman, 5/12/10, and CCP QA Engineer or Designee [Signature] Mark Weaver, 5/12/10.

CLOSURE PENDING.

Comments: NCR-LANL-0507-10, Rev. 0 (CBFO NCR# 349), initiated on 5/12/10, was transmitted to CBFO via wipp.notify@wipp.ws on 5/13/10 by Sue Peterman, WTS/CCP.

350	CO	5/21/2010	5/25/2010	OPEN	<p>Process: NDE Batch Data Report: OR-RTR6-0287 Container #: X10C0102695L Description of Nonconformance: Other. CCP Hold Tags: No justification listed. NCR Form indicates that CCP Hold Tags associated with the NCR have been applied.</p> <p>Actual Condition: 1. In BDR OR-RTR6-0287, drum X10C0102695L was recorded on the Attachments 2 as X10C0102696L on the original scan and the Replicate scan. However, subsequent investigation by the QAE by visual verification of container traveler for both containers has determined that X10C0102695L was the container actually scanned and characterized in BDR OR-RTR6-0287. Therefore, the audio/video was entered correctly for both the original scan and Replicate scan and the data sheets were incorrect. 2. The Batch Narrative (Attachment 4) incorrectly states that the video/audio is incorrect and that the data sheets are correct. 3. The Cover Sheet (Attachment 5) also incorrectly indicates the container number as X10C0102696L. 4. The ITR checklist was completed based on the assumption that the comment placed on the Attachment 4 (indicating the audio/video was incorrect). [sic] As a result, questions 6 and 17 of the ITR checklist are answered incorrectly.</p> <p>Does this NCR have the potential to impact AK: No Significant Condition: Yes Recurring Condition: No Trend Code: B</p> <p>Requirement Violated: CCP-TP-053, Revision 7 4.4 RTR System Operation 4.4.2 Waste Container Scanning NOTE: Waste Container Identification (ID) Numbers shall be obtained by direct visual observation. An Attachment 2 must be completed for all waste containers examined. 4.4.3 Data Entry [A] Record the following data in Section 1 of Attachment 2: [A.5] Waste Container ID. [A.6] Waste Container ID at the top of Page 2 and Page 3 of Attachment 2.</p> <p>Actions: CCP QA Engineer or Designee Validation [Signature] Christine M. Gomez, 5/21/10. Interim Disposition: N/A Instructions for Completion of the Interim Disposition, Interim Disposition Approvals, and Completion of Interim Disposition: Not indicated on NCR form. Final Disposition: Rework Technical Justification: N/A Disposition Instructions: N/A</p>
NCR-ORNL-0517-10, Rev. 0	Oak Ridge National Laboratory / Central Characterization Project (CCP)	Candice Weston			

NCR Number: CBFO Assigned Site Assigned:	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
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By:

Instructions for Completion of the Final Disposition:

1. DGL to correct all associated documentation addressed in this NCR.
2. DGL to insert a copy of this NCR into the BDR.
3. ITR and SPM to complete re-review of BDR after corrections have been made and document review via appropriate checklists.

Actions to Prevent Recurrence: Refer to CAR-ORNL-0006-10.

Final Disposition Approvals: Responsible Manager/Individual [Signature] Candice Weston, 5/21/10, and CCP QA Engineer or Designee [Signature] Christine M. Gomez, 5/21/10.

CLOSURE PENDING.

Comments: NCR-ORNL-0517-10, Rev. 0 (CBFO NCR# 350), initiated on 5/21/10, was transmitted to CBFO via wipp.notify@wipp.ws on 5/25/10 by Candice Weston, WTS/CCP.

Number of items on this report: 4