



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



JUL 8 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, June 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 June 1 through June 30, 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
 J. Bearzi, NMED
 S. Holmes, NMED
 V. Daub, CBFO

* ED
 ED
 ED
 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
June 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 June 1 through June 30, 2010, the Carlsbad Field Office received four reportable nonconformance reports, generated by the Savannah River Site(SRS)/Central Characterization Project (CCP), the Idaho National Laboratory(INL)/CCP, the Oak Ridge National Laboratory (ORNL)/CCP, and the INL Advanced Mixed Waste Treatment Project.

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 6/1/2010

Earliest End Date = 6/30/2010

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
351 NCR-SRS-0510-10, Rev. 0	CS Savannah River Site / CCP	6/4/2010 Craig Simmons	6/4/2010	OPEN	<p>Process: NDE Batch Data Report: SR4RTR0080 Container #s: MDL0310925, MDL0310930, MDL0310932, and MDL0310936. Description of Nonconformance: Other. CCP Hold Tags: No justification listed. Hold Tags associated with the NCR not indicated Yes/No/or N/A on NCR Form.</p>

Actual Condition: The wrong Waste Matrix Code was recorded for all of the containers in the batch including the replicate and independent observation. S5410 Composite Filter Debris – "...includes debris that is estimated to be 50% by volume, or more, high-efficiency particulate air filters..." was recorded rather than S5400 Heterogeneous Debris. This condition is also included in CAR-SRS-0001-10.

Does this NCR have the potential to impact AK: No
Significant Condition: No
Recurring Condition: No
Trend Code: A

Requirement Violated: CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Revision 6:
 • Step 4.4.3[D] - "Record the following data in Section 2... [D.3] Waste Matrix Code."
 • Step 4.4.3[H.2] - "IF the waste form DOES NOT match the Waste Stream description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-QP-005, AND record NCR number in Section 1 of Attachment 2 and a description in the Comments block.
 • Step 4.10.3 - "Review the BDR to the criteria in the checklist of Attachment 3." Attachment 3, Item 14 "Does the waste match the Waste Matrix Code and Waste Stream description?"

CCP-TP-001, CCP Project Level Data Validation and Verification, Revision 7, Attachment 2, Item 9 - "Is there evidence that the physical form matches the Waste Matrix Code?"

Actions: CCP QA Engineer or Designee Validation [Signature] Christine M. Gomez, 6/4/10.
 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. RTR Operator - Correct the Waste Matrix Code in Section 2 of the Radiography Data Sheets for the containers.
 2. RTR Operator – Re-review the associated containers to ensure that the physical form of the waste is consistent with the waste matrix code as required by Section of the Radiography Data Sheet and resign the data sheets.
 3. RTR ITR – Re-perform the ITR review of the BDR and submit the BDR corrections to CCP Records.
 4. SPM – Insert corrections in the BDR and re-perform the Validation.
 Actions to Prevent Recurrence: Corrective actions to prevent a recurrence are being completed in accordance with CAR-SRS-0001-10.
 Final Disposition Approvals: Responsible Manager/Individual [Signature] Craig Simmons, 6/4/10, and CCP QA Engineer or Designee [Signature] Christine M. Gomez, 6/4/10.

CLOSURE PENDING.

<u>NCR Number:</u> <u>CSFO 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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Comments: NCR-SRS-0510-10, Rev. 0 (CBFO NCR# 351), initiated on 6/4/10, was transmitted to CBFO via wipp.notify@wipp.ws on 6/4/10 by Craig Simmons, SPM, WTS/CCP.

352 NCR-INL-0028-09, Rev. 0	CI Idaho National Laboratory / CCP	8/20/2009 Barbara Broomfield	6/9/2010	9/15/2009	<p>Process: RTR Batch Data Report: INRTR5090061 Container #: NT080014R 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: Lead was identified in the waste. The only RCRA HWN assigned to this waste stream in CCP-AK-INL-013, Rev 0. Is D011 for Silver. It was not noted at the DGL in the BDR that the waste contained a hazardous constituent that was not in the AK. Instead the container was considered acceptable for matching the waste stream description.</p> <p>Does this NCR have the potential to impact AK: Yes Significant Condition: No Recurring Condition: No Trend Code: L</p> <p>Requirement Violated: CCP-TP-053, Rev. 6, Section 4.4.3 [H.2] IF the waste form DOES NOT match the Waste Stream description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-QP-005 AND record NCR number in Section 1 of Attachment 2 and a description in the Comments block.</p> <p>CCP- TP-001, Rev. 17, Section 4.2.14 [A] If data affecting inconsistencies, mistakes, omissions, etc. are noted during the SPM review, that impact or change the characterization data, THEN place the BDR on HOLD by selecting PLACE BDR ON HOLD, AND enter the reason for HOLD in the Comments/Qualifiers Section by selecting ADD/EDIT COMMENTS: [A] Initiate an NCR, if applicable, in accordance with CCP-QP-005.</p> <p>Actions: CCP QA Engineer or Designee Validation [Signature] R. Czyzewski, 8/20/09. Interim Disposition: Hold Instructions for Completion of the Interim Disposition: The INL AK Expert will re-evaluate the waste contents of this container per CCP-TP-005. Interim Disposition Approvals: Responsible Manager [Signature] Barbara Broomfield, 8/20/09, and CCP QA Engineer or Designee [Signature] R. Czyzewski, 8/20/09. Completion of Interim Disposition: Responsible Manager [Signature] Barbara Broomfield, 8/25/09, and Interim Disposition Verified CCP QA Engineer or Designee [Signature] R. Czyzewski, 8/26/09. Additional Notes: The AK re-evaluation has been completed. The AK report is to be revised to include EPA HWN D008. [Signature] Barbara Broomfield, 8/25/09. See Attachment 1. [Signature] R. Czyzewski, 8/26/09. Final Disposition: Reject Technical Justification: N/A Disposition Instructions: Reject from BDR. Re-run in separate batch. Maintain hold on container until completion of final disposition. Instructions for Completion of the Final Disposition: N/A Actions to Prevent Recurrence: Brief RTR personnel on use of AK. Final Disposition Approvals: Responsible Manager/Individual [Signature] Barbara Broomfield, 8/25/09, and CCP QA Engineer or Designee [Signature] R. Czyzewski, 8/26/09.</p>
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CLOSURE:

<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>Final Disposition Complete Responsible Manager [Signature] Barbara Broomfield, 9/15/09. Attachments: Attachment 1 AK Documentation (4) and Attachment 2 RTR Data Sheet (3) Final Disposition Verified - NCR Closed: CCP QA Engineer [Signature] Christine M. Gomez, 9/16/09. Additional Notes: The RTR personnel were briefed on 8/24/09 on being more attentive to the requirements of the Acceptable Knowledge Documents and not to utilize PKs in performing the RTR scans to determine acceptance. [Signature] R. Czyzewski, 8/24/09. NT080014R was re-run in RTR batch INRTR5090063. See Attachment 2. [Initialed - illegible] 9/15/09.</p> <p>Comments: NCR-INL-0028-09, Rev. 0 (CBFO NCR# 352), initiated on 8/20/09, was transmitted twice to CBFO via wipp.notify@wipp.ws on 6/9/10 by Michael Walentine, SPM, WTS/CCP, and on 6/10/10 by J. Vernon, SPM, WTS/CCP.</p>
353 NCR-RHORNL-0525-10, Rev. 0	CO Oak Ridge National Laboratory / Central Characterization Project (CCP)	6/7/2010 Laura M. Nelson	6/9/2010	OPEN	<p>Process: VE Batch Data Report: RHORVE100091 Container #s: ORRH00335, ORRH00334, and ORRH00333. Description of Nonconformance: Other. CCP Hold Tags: NCR Form indicates that application of CCP Hold Tags associated with the NCR is N/A. Justified as follows: Due to ALARA considerations, NCR tagging will not be applied for this NCR. Administrative control will be applied through container entry in the CCP Data Center. In addition, a listing of containers has been posted on the CCP ftp site, identifying those containers where NCR tagging is not being applied due to ALARA. Container information for this NCR has been included in the listing, which is to alert Mobile Loading Unit personnel as a second control mechanism for non-tagged containers. The current listing has been posted to the ftp site.</p> <p>Actual Condition: The ITR checklist question 9, "Is there adequate written description of the contents?" was incorrectly checked as N/A.</p> <p>Does this NCR have the potential to impact AK: No Significant Condition: N/A Recurring Condition: No Trend Code: A</p> <p>Requirement Violated: CCP-TP-500, Rev. 8, Section 4.3.6 "Review the BDR to the Criteria in Attachment 2, and document on Attachment 2."</p> <p>Actions: CCP QA Engineer or Designee Validation [Signature] Christine M. Gomez, 6/7/10. 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: ITR must re-review BDR, making corrections on Attachment 2, and re-submit BDR to CCP Records. Final Disposition Approvals: Responsible Manager/Individual [Signature] Hillari J. Neely, 6/7/10, and CCP QA Engineer or Designee [Signature] Christine M. Gomez, 6/7/10.</p> <p>CLOSURE PENDING.</p> <p>Comments: NCR-RHORNL-0525-10, Rev. 0 (CBFO NCR# 353), initiated on 6/7/10, was transmitted to CBFO via wipp.notify@wipp.ws on 6/9/10 and on 6/10/10 by Hillari Neely, RH SPM, WTS.</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>
354 53659	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	6/10/2010 David Marquardt	6/10/2010	OPEN	<p>Title: IDC change for container 10116587 Affected Item: 10116587 Affected Item Type: Container ID Batch #: RTR10-00095 Container ID: 10116587</p> <p>Actual Condition: Container 10116587, historical IDC RF-300, was characterized through RTR10-00095 on 04-23-10. BDR was validated and approved at the SPM level on 05-25-10. Type 3 NCR 46774 was associated with this container and when presented for closure, it was requested that the RTR SME verify the IDC was correct. RTR SME performed the tape review and determined the RF-300 IDC assignment was incorrect. RTR SME recommended an IDC change to RF-320.</p> <p><u>Requirement Violated:</u> INST-OI-12, MP-TRUW-8.8, MP-TRUW-8.9</p> <p><u>Actions:</u> Tag Applied: Yes No. of Tags: 1 Manager Review By: Eric Scheweinsberg, 6/10/10.</p> <p>CLOSURE PENDING.</p> <p><u>Comments:</u> AMWTP NCR #53659 (CBFO NCR# 354), initiated on 6/10/10, was transmitted to CBFO via wipp.notify@wipp.ws on 6/10/10 by Eric Scheweinsberg, AMWTP.INL.GOV.</p>

Number of items on this report: 4