



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 AUG 6 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, July 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 July 1 through July 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
 O. Vincent, 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
July 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 July 1 through July 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, the Idaho National Laboratory (INL)/CCP, and the INL Advanced Mixed Waste Treatment Project (AMWTP).

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 7/1/2010

Earliest End Date = 8/30/2010

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

<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>
355	CO	6/30/2010	7/1/2010	OPEN	<p>Process: HSG Batch Data Reports: ORHSGS100003, ECL10005G, and ECL10005M Container #(s): N/A Description of Nonconformance: Other. CCP Hold Tags: NCR Form indicates that application of CCP Hold Tags associated with the NCR is N/A. Justification for not applying CCP Hold Tags is indicated as "N/A."</p> <p>Actual Condition: One of the samplers did not sign the chain-of-custody (COC). In addition, one of the samplers that signed a Gas Sample Canister Tag did not initial the Sampler's Signature column of the COC.</p> <p>Does this NCR have the potential to impact AK: No Significant Condition: No Recurring Condition: No Trend Code: B</p> <p>Requirement Violated: CCP-TP-093, Rev. 13, CCP Sampling of TRU Waste Containers, Section 4.5.5[Q.8], "Enter the following data for each container sample on Attachment 1: Sampler's Signature."</p> <p>Actions: CCP QA Engineer or Designee Validation [Signature] Laura Jones, 6/30/10. 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. Sampler(s) correct COC so that the sampler listed on the Gas Sample Canister Tag, the Sampler's Signature (last column of the COC), and the Sampler's Signature at the bottom of the COC are consistent. 2. Include corrected COC in the listed BDRs. 3. ITR to re-perform and document re-review. 4. CCP to re-perform and document SPM review. Corrective Actions (Actions to Prevent Recurrence): Corrective actions are documented in CBFO CAR 10-027. Final Disposition Approvals: Responsible Manager/Individual [Signature] Richard Kantrowitz, 6/30/10, and CCP QA Engineer or Designee [Signature] Laura Jones, 6/30/10.</p> <p>CLOSURE PENDING.</p> <p>Comments: NCR-ORNL-0520-10, Rev. 0 (CBFO NCR# 355), initiated on 6/30/10, was transmitted to CBFO via wipp.notify@wipp.ws on 7/1/10 by Candice Weston, SPM, WTS.</p>
356	CR	7/8/2010	7/8/2010	OPEN	<p>Process: NDE Batch Data Report: RLRTRA0035 Container #s: RL0054992, RL0055085, and RL0054934 Description of Nonconformance: Other. CCP Hold Tags: NCR Form does not indicate whether or not CCP Hold Tags associated with the NCR have been applied. Justification for not applying CCP Hold Tags is indicated as "N/A."</p> <p>Actual Condition:</p>
NCR-ORNL-0520-10, Rev. 0	Oak Ridge National Laboratory / Central Characterization Project (CCP)	Richard Kantrowitz			
NCR-RL-0513-10, Rev. 1	Hanford Site / CCP	Beverly Schrock			

<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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RL0054922 is listed on the Cover Sheet and it is listed as RL0054992 on the Attachment 2 - CCP Radiography Data Sheet.

RL0055085 – On the Attachment 2 - CCP Radiography Data Sheets, Page 1 of 3 has a different Batch Number, Waste Container ID#, Examination Date, and Video/Audio Recorded Media Number for this drum, pages 2 and 3 shows information for this container that matches the BDR.

Reason for Revision 1: Add RL0054934 - Page 2 of Attachment 2 - CCP Radiography Data Sheet has the Waste Container ID listed as RL0055234.

Reason for Revision 1: Changed RL0054922 in Box 3 to RL0054992.

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

Requirement Violated: CCP-TP-053, Revision 8, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Attachment 3, CCP Radiography Independent Technical Reviewer Checklist, Question 10, "Is all data recorded clearly, legibly, and accurately?"

Actions: CCP QA Engineer or Designee Validation [Signature] Laura Jones, 7/8/10.

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. Operator correct information on Attachment 2s
2. ITR re-review of corrected BDR
3. SPM review of corrected BDR

Corrective Actions (Actions to Prevent Recurrence): N/A

Final Disposition Approvals: Responsible Manager/Individual [Signature] Beverly S. Schrock, 7/8/10, and CCP QA Engineer or Designee [Signature] Laura Jones, 7/8/10.

CLOSURE PENDING.

Comments: NCR-RL-0513-10, Rev. 1 (CBFO NCR# 356), initiated on 7/8/10, was transmitted to CBFO via wipp.notify@wipp.ws on 7/8/10 by Veronica Waldram, WTS. Included in the 7/8/10 transmittal by Veronica Waldram was NCR-RL-0513-10, Rev. 0, initiated on 7/7/10 by Beverly S. Schrock, and superseded by NCR-RL-0513-10, Rev. 1 on 7/8/10.

357	CI	7/15/2010	7/15/2010	OPEN	Process: RH_RTR Batch Data Report: INLRHRTR10007 Container #: SN136A 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.
NCR-RHINL-0508-10, Rev. 0	Idaho National Laboratory / CCP	Laura Nelson			

<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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Actual Condition: The Independent Observation Attachment 2s differ significantly from the RTR's Attachment 2s on container SN136A; the discrepancies were not reconciled between operators.

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

Requirement Violated: CCP-TP-508, Rev. 5, Section 4.5, Independent Observations requirements as discussed in this section state, "4.5.3 If sections 4 and 5 of attachment 2 differ, then perform the following: reconcile the results (with both RTR operators) as follows: Jointly perform a real-time review of the Attachment 2 (s). Jointly review the media or re-scan the container, and make corrections, as required to the Attachment 2 (s)."

Actions: CCP QA Engineer or Designee Validation [Signature] Laura Jones, 7/15/10.
 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: The original Independent Observation Operator needs to re-review the video of the RTR scan for container SN136A and correct the inventory on Attachment 2 appropriately.
 Corrective Actions (Actions to Prevent Recurrence): N/A
 Final Disposition Approvals: Responsible Manager/Individual [Signature] Laura Nelson, 7/15/10, and CCP QA Engineer or Designee [Signature] Laura Jones, 7/15/10.

CLOSURE PENDING.

Comments: NCR-RHINL-0508-10, Rev. 0 (CBFO NCR# 357), initiated on 7/15/10, was transmitted to CBFO via wipp.notify@wipp.ws on 7/15/10 by Laura Nelson, WTS, RH-SPM.

358	IA	7/21/2010	7/26/2010	OPEN	Title: Site Project Office Non-Compliance Affected Item: Batch Data Report Affected Item Type: Characterization Batch Batch #: RTR09-00115 Container ID: 10032690
54488	INL Advanced Mixed Waste Treatment Project (formerly INEEL)	Eric Schweinsberg			Actual Condition: Upon completion of SPM Validation of container 10032690, RTR09-00115, it was determined an open NCR existed which had not been addressed per MP-TRUW-8.9, Section 3.2.4 and 3.2.9. The NCR (20298) had been opened by the SPO/SKE to address a Waste Matrix Code discrepancy. The rework was not completed, nor was the NCR addressed before the BDR signed off as complete by the SPMD. A Corrective Action Report will be initiated against this event.
					<u>Requirement Violated:</u> MP-TRUW-8.9 (Section 3.2.9), MP-TRUW-8.2 Section B3-11a
					<u>Actions:</u> Tag Applied: No Manager Review By: Eric Schweinsberg, 7/22/10.
					CLOSURE PENDING.
					<u>Comments:</u> AMWTP NCR #54488 (CBFO NCR# 358), initiated on 7/21/10, was transmitted to CBFO via wipp.notify@wipp.ws on 7/26/10 by Eric Schweinsberg, AMWTP.INL.GOV.

<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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Number of items on this report: 4