



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

MAR 2011

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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, February 2011

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, Attachment C3-13, *Nonconformance to DQOs*. The report lists site-generated NCRs at CBFO during the period of February 1 through 28, 2011.

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 Martin P. Navarrete, CBFO Acting Quality Assurance Director, at (575) 234-7483.

Sincerely,

Edward Ziemianski
 Acting Manager

Enclosure

cc: w/enclosure

J. Kieling, NMED * ED
 J. Bearzi, NMED ED
 S. Holmes, NMED ED
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 WIPP Operating Record ED
 CBFO QA File
 CBFO M&RC

ED denotes electronic distribu



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
February 2011

This summary is submitted pursuant to the requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3-13, Nonconformance to DQOs.

During the period of February 1 through February 28, 2011, the Carlsbad Field Office received three reportable nonconformance reports, generated by the Idaho National Laboratory (INL)/Central Characterization Project (CCP), and the Hanford Site/Central Characterization Project (CCP).

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 2/1/2011

Earliest End Date = 2/28/2011

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

<u>NCR Number: CCFO Assigned Site Assignment</u>	<u>Responsible Organization</u>	<u>Date Identified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
365 NCR-RL-0502-11 Rev. 0	CR Hanford Site / CCP	1/31/2011 Veronica Waldram	2/2/2011	OPEN	Container RL0061240 was re-evaluated as part of the extent and impact evaluation from CAR-RL-0001-11. It contains an impenetrable item not previously identified. Requirement Violated: -Requirement Violated: CCP-TP-053, Revision 9, Section 4.4.3[B], CCP Standard Real-Time Radiography (RTR) Inspection Procedure, IF a container is identified in the S5000 summary category group that CAN NOT be penetrated by the RTR method because of the presence of lead, or other shielding, THEN initiate a NCR in accordance with CCP-QP-005, CCP TRU Nonconforming Item Reporting and Control. Actions: 1. Return to host site. Comments: None
366 NCR-RL-0501-11 Rev. 0	CR Hanford Site / CCP	1/31/2011 Veronica Waldram	2/2/2011	OPEN	Container RL0070516 was re-evaluated as part of the extent and impact evaluation from CAR-RL-0001-11. It contains a prohibited amount of liquid. Requirement Violated: -Requirement Violated: CCP-TP-053, Revision 9, Table 1, Prohibited Items states in part...liquid waste -Observable liquid shall be no more than 1 percent by volume of the outermost container. -Internal containers with more than 60 milliliters or 3 percent by volume observable liquid, whichever is greater, are prohibited. - Containers with Hazardous Waste Number U134 assigned shall have no observable liquid Actions: 1. Return to host site. Comments: None
367 NCR-INL-0513-11 Rev. 0	CI Idaho National Laboratory / CCP	2/22/2011 Jim Vernon	2/23/2011	OPEN	The waste material is predominantly sludge, but there is no indication absorbent was added during VE or packaging. Hence the packaging criteria specified by AK is not met. Further the data sheets for containers ARP23128 and ARP25178 were corrected at the DGL level several days after VE was performed to indicate that absorbent was added to the waste container, but there is no evidence to prove that absorbent was added to the container at the time of packaging. Requirement Violated: CCP-AK-INL-001, Rev. 9, Section 5.7 "CCP has opted to adopt a conservative approach to prevent this potential settling and accumulation of liquid in the void space of sludge drums. ... In addition, a granular absorbent is added to the top of the waste during VE in the drum packaging station." Actions: The drums will be returned to the Host site. This NCR is to be added to the BDR. The BDR will be re-reviewed by the ITR and the VEE, and the corrections submitted to records. Comments: None

Number of items on this report: 3