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



APR 7 2011

CERTIFIED MAIL –RETURN RECEIPT

Mr. Steve Zappe, Project Leader
Hazardous Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports, March 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 received at CBFO during the period of March 1-31, 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 Dennis S. Miehl, CBFO Acting Director of the Office of Quality Assurance, at (575) 234-7491.

Sincerely,


Edward Ziemianski (for)
Acting Manager

Enclosure

cc: w/enclosure

J. Kieling, NMED * ED
J. Bearzi, NMED ED
S. Holmes, NMED ED
O. Vincent, CBFO ED

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WIPP Operating Record ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distrib



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
March 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 March 1 through March 31, 2011, the Carlsbad Field Office received three reportable nonconformance reports, generated by the Idaho National Laboratory (INL)/Central Characterization Project (CCP), and the Oak Ridge National Laboratory/Central Characterization Project (CCP).

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 3/1/2011

Earliest End Date = 3/31/2011

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

<u>NCR Number: CBFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
368 NCR-ORNL-0502-11, Rev. 0	CO Oak Ridge National Laboratory / Central Characterization Project (CCP)	2/28/2011 Beverly Schrock	3/1/2011	OPEN	<p>Process: NDE Batch Data Report #(s): OR-RTR6-0383 Container #(s): NFS0591B, NFS0506B, NFS0107A</p> <p>Waste form descriptions and waste material parameters (WMPs) do not reflect the S3900 waste matrix code for the containers. The Independent Observation (IO) container was correct, but had a statement in the comments that it agreed with the original scan. The IO and the original container WMPs did not agree.</p> <p>Requirement Violated: CCP-TP-053, Revision 9, 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>Actions: 1. BDR# OR-RTR6-0383 to be voided. 2. Containers to be ran through RTR</p> <p>Comments: None</p>
369 NCR-ORNL-0503-11, Rev. 0	CO Oak Ridge National Laboratory / Central Characterization Project (CCP)	2/28/2011 John Rovansek	3/1/2011	OPEN	<p>Process: NDE Batch Data Report #(s): OR-RTR6-0380</p> <p>(1) Incorrect Waste Material Parameter (WMP) data is identified for rad pads in Section 3 and Section 4 of Attachment 2. Plastic waste material was identified instead of cellulosic item per the Acceptable Knowledge Summary waste stream. Containers are as follows: X10CSATN01878A OR-REDC-CH-HET X10C9311525A OR-ISTP-CH-HET X10C9312387A OR-ISTP-CH-HET</p> <p>(2) X10C9311525A: Rubber WMP weight is identified in Section 4. No rubber items were identified in Section 3 Container Inventory. Weight is not provided for Plastics (XPM) material.</p> <p>Requirement Violated: CCP-TP-053, Rev 9, "CCP Standard Real Time Radiography (RTR) Inspection Procedure", paragraph 4.4.3, "Data Entry", states in part, "[E] Complete an itemized description of the waste inventory in Section 3. [G] Using Table 2, Waste Material Parameters, Table 3, Waste Item Weights, and additional item weight information provided by the Host site, record the estimated weight for each WMP and sum all WMPs and record the total WMP weight in Section 4 of Attachment 2.</p> <p>Actions: 1) Correct deficiency identified in paragraph 7. (c) Actual Condition. 2) Re-review in accordance with applicable procedure. 3) SPM to perform document re-review.</p> <p>Comments: None</p>
370 NCR-INL-2031-11, Rev. 0	CI Idaho National Laboratory / CCP	3/23/2011 Charlie Turner	3/28/2011	OPEN	<p>Process: HSG Batch Data Report #(s): INHSG1101, ECL11005G, ECL11005M Container #(s): C973055, C973151, C973053, C973058, C973147, C080097, C973154, C973139</p> <p>The incorrect waste stream ID was entered on Attachment 1</p> <p>Requirement Violated: CCP-TP-093, CCP Sampling of TRU Waste Containers, Revision 14, Step 4.5.4 [R] Enter the data listed below for</p>

<u>NCR Number:</u> <u>CRFO 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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each Duplicate Sample canister on Attachment 1: and [R.6] Waste Stream ID. CCP-TP-093, CCP Sampling of TRU Waste Containers, Revision 14, Step 4.5.5 [R] Enter the data listed below for each container sample on Attachment 1: and [R.6] Waste Stream ID.

Actions: Correct Attachment 1 and submit corrected Attachment 1 to CCP Records.

Comments: None

Number of items on this report: 3