



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

May 9, 2011

CERTIFIED MAIL -RETURN RECEIPT

Mr. John Kieling, Acting Bureau Chief
 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, April 2011

Dear Mr. Kieling:

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 April 1-30, 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 Mr. Randy Unger, Director, Office of Quality Assurance, at (575) 234-7065.

Sincerely,

Edward Ziemianski
 Acting Manager

Enclosure

cc: w/enclosure
 S. Holmes, NMED
 T. Hall, NMED
 O. Vincent, CBFO

* ED
 ED
 ED

WIPP Operating Record ED
 CBFO QA File
 CBFO M&RC
 *ED denotes electronic distribution



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
April 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 April 1 through April 30, 2011, the Carlsbad Field Office received five reportable nonconformance reports, generated by the Hanford Site/Central Characterization Project (CCP), Oak Ridge National Laboratory/Central Characterization Project (CCP), and the Savannah River Site/Central Characterization Project (CCP).

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 4/1/2011

Earliest End Date = 4/30/2011

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>
371 NCR-RL-2316- 11, Rev. 0	RL Hanford Site	3/31/2011 Veronica Waldram	4/4/2011	OPEN	Process: NDE Batch Data Report #(s): RLRTB0111 Container #(s): RL0073341 Container RL0073341 was re-evaluated. It contains a prohibited amount of liquid. <u>Requirement Violated:</u> CCP-TP-053, Revision 10, 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 <u>Actions:</u> 1. Return to host site. <u>Comments:</u> None
372 NCR-RL-2319- 11, Rev. 0	CR Hanford Site / CCP	4/5/2011 Veronica Waldram	4/7/2011	OPEN	Process: NDE Batch Data Report #(s): RLRTA0099 Container #(s): RL0063045 Container RL0063045 had the incorrect Waste Stream ID listed. <u>Requirement Violated:</u> CCP-TP-053, Revision 10, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.4.2 [D] states "Record the following data in Section 2: Waste Container Data, of Attachment 2", Section 4.4.2 [D.4] states "Waste Stream ID." <u>Actions:</u> 1. Operator correct Waste Stream I.D. 2. ITR review correction. 3. Submit correction to Records. 4. SPM review correction. <u>Comments:</u> None
373 NCR-SRS- 2166-11, Rev. 0	CS Savannah River Site / CCP	4/6/2011 Candice Weston	4/7/2011	OPEN	Process: VE Batch Data Report #(s): see list below Container #(s): see list below BDR #(s) Container #(s) SRVEFW0312 SR46002K SRVEFW0313 SR460590 SRVEFW0314 SR46068Y SRVEFW0314 SR46068YA SRVEFW0315 SR46064NA SRVEFW0317 SR66292 SRVEFW0318 SR46068S SRVEFW0318 SR46068SA SRVEFW0319 SR46038UA SRVEFW0319 SR46067W SRVEFW0321 SR66291

<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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SRVEFW0321 SR70380
SRVEFW0322 SR46040P
SRVEFW0325 SR70385
SRVEFW0326 SR46081T
SRVEFW0328 SR46067RA
SRVEFW0329 SR70360
SRVEFW0332 SR46003H
SRVEFW0333 SR46081QA
SRVEFW0334 SR46065VA
SRVEFW0336 SR66265

Lead lined gloves were incorrectly assigned to waste material parameter "Other Metals" instead of "Rubber".

Requirement Violated: CCP-AK-SRS-009, Rev.2, Section 5.4.1, indicates that drummed waste containing lead lined gloves will be grouped into the "Rubber" waste material parameter.
CCP-TP-113, Revision 15, Table 3, indicates that leaded rubber gloves will be grouped into the "Rubber" waste material parameter.

Actions:
1. DGL to add a copy of this NCR to the affected BDRs.
2. DGL to correct Attachment 2, Sections 2 and 3 to group the lead lined glove into the correct waste material parameter.
3. ITR to perform re-review.

Comments: None

374	CS	4/21/2011	4/21/2011	OPEN	Process: NDE Batch Data Report #(s): SRLBR0004 Container #(s): SR57053401 SR57053406 PCB identified containers with observable liquids.
NCR-SRS-2437-11, Rev. 0	Savannah River Site / CCP	Adela Cantu			

Requirement Violated: CCP-PO-002, CCP Transuranic Waste Certification Plan Section 3.4 Physical Properties Step 3.4.1 Observable Liquids [A] Requirements [A.1] Liquid waste is not acceptable at the WIPP. Observable liquid containing PCBs is prohibited at the WIPP.

Actions:
1. REJECT SWB containers in RTR BDR
2. Return to SRS for remediation of all observable liquid

Comments: None

375	CO	4/28/2011	4/28/2011	OPEN	Process: NDE Batch Data Report #(s): OR-RTR6-0190 OR-RTR6-0343 Container #(s): X10C0501698 X10C0102692D
NCR-ORNL-2248-11, Rev. 0	Oak Ridge National Laboratory / Central Characterization Project (CCP)	Beverly Schrock			

X10C0501698 - RTR shows electric motor with pump attached and residual liquid. This is potentially a PCB item per AKTSS.

<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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X10C0102692D - this drum is from waste that is characterized as PCB bulk product waste because of the painted surfaces. RTR scan showed liquid in fold of plastic. This is a PCB item per AKTSS.

Requirement Violated: CCP-TP-053, Rev. 10, "CCP Standard Real-Time Radiography (RTR) Inspection Procedure", Table 1 – Prohibited Items – List of Prohibited Items - PCB liquids

Actions: Send to VE for repackaging and absorption of all liquids found.

Comments: None

Number of items on this report: 5