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    * ED
T. Hall, NMED      ED
O. Vincent, CBFO   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

<table>
<thead>
<tr>
<th>NCR Number:</th>
<th>Responsible Organization</th>
<th>Data Identified</th>
<th>Data NCR Received</th>
<th>Data Closed</th>
<th>Deficiency</th>
</tr>
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</table>
Batch Data Report #s: RLRTRB0111  
Container #s: RL0073341  

- Container RL0073341 was re-evaluated. It contains a prohibited amount of liquid.  
- **Requirement Violated**: 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  

**Actions**:  
1. Return to host site.  
2. 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.”  

**Actions**:  
1. Operator correct Waste Stream I.D.  
2. ITR review correction.  
3. Submit correction to Records.  
4. SPM review correction.  

**Comments**: None

<table>
<thead>
<tr>
<th>NCR Number:</th>
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</table>
Batch Data Report #s: RLRTRA0099  
Container #s: RL0063045  

- Container RL0063045 had the incorrect Waste Stream ID listed.  

**Actions**:  
1. Operator correct Waste Stream I.D.  
2. ITR review correction.  
3. Submit correction to Records.  
4. SPM review correction.  

**Comments**: None

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</table>
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 SR66232  
SRVEFW0318 SR46068E  
SRVEFW0318 SR46068SA  
SRVEFW0319 SR46038UA  
SRVEFW0319 SR46038SA  
SRVEFW0321 SR66291

**Date of this report**: Monday, May 02, 2011
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<td>Savannah River Site / CCP</td>
<td>4/1/2011</td>
<td>4/21/2011</td>
<td>OPEN</td>
<td>Lead lined gloves were incorrectly assigned to waste material parameter “Other Metals” instead of “Rubber”.</td>
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**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.

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

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**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

**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

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Actions:

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

**Comments:** None

**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

Date of this report: Monday, May 02, 2011
The 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

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**Number of items on this report:** 5