



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

JUN 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, May 2011

JUN 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 May 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 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  
 R. Unger, CBFO

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



**MONTHLY SUMMARIZATION REPORT**  
**FOR**  
**SITE-GENERATED NONCONFORMANCE REPORTS**  
**May 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 May 1 through May 31, 2011, the Carlsbad Field Office received one reportable nonconformance report, generated by the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP).

**List of ALL Reportable NCRs Between the following Dates:**

**Latest Start Date =** 5/1/2011

**Earliest End Date =** 6/01/2011

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

<b>NCR Number- CBFO Assigned</b>	<b>Responsible Organization</b>	<b>Date Identified</b>	<b>Date NCR Received</b>	<b>Date Closed</b>	<b>Deficiency</b>
376	IA	5/16/2011	5/17/2011	OPEN	Source Type: As Found Condition Requirement Violated: MP-TRU-8.8, step 3.2.1.4.3 Equipment ID: VE BID RPKC Batch No: VEB11-00470 Container ID: 10407700
62740	INL Advanced Mixed Waste Treatment Project (formerly INEEL)	Kevin Lundquist			<p><b>Requirement Violated:</b> Requirement Violated: MP-TRU-8.8, step 3.2.1.4.3</p> <p>Batch VEB11-00470 contains 21 drums (1 too many). QA comment: Condition was identified at the SPM level of review. Containers 10407694 and 10407700 were both e-signed at exactly the same time. First operators e-signed 05/15/11 at 16:24:09 for both containers and the second operators e-signed 05/15/11 at 16:24:10 for both containers.</p> <p>QA Comment: NCR 62740 has been updated to reflected Affected Item Type as 'Container ID'. Corrective action for Container ID 10407700 will be addressed via this NCR. Container ID field has been updated to remove container 10407694 as this container is the 20th container with valid analysis results in VEB11-00470. A. Morse 05-24-11</p> <p><b>Actions:</b> As shown in the attached file, an extent of condition associated with this event (greater than 20 containers in a VEB batch) has been completed. In summary, of the over 7,700 VEB batches generated since the inception of this examination technique in August of 2004, approximately 140,000 containers have been examined and this is the only instance of more than 20 valid containers being associated with a VEB batch.</p> <p>The attached WTS searches show an additional six VEB BDRs with over 20 containers in the batch; however, each batch actually consists of 20 containers. The search counted the containers that had been discarded/non-reported during data generation activities and prior to batch closure. In these six cases the total number of valid containers in the batch did not exceed 20.</p> <p>The event associated with this nonconformance report, greater than 20 containers in a VEB batch, is limited to this single occurrence. A history of all VEB records were researched and no other examples were identified. This is an anomalous event identified during validation, and does not warrant significant process modification in an attempt to reduce the probability of a second occurrence.</p> <p>For closure of this NCR the following actions will be required: Non-report 10407700 from VEB11-00470. Re-analyze 10407700 in a new batch. Validation of VEB11-00470, with the remaining twenty containers, through SPM. Validation of the new batch containing 10407700 through SPM. Briefing of Level I validation personnel associated with the limit for the number of containers in a visual examination batch. GTB 5/25/2011 QA comment: Agree with the disposition. LR060111</p>
					<b>Comments:</b> None

**Number of items on this report:** 1