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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
July 12, 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, June 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 June 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 any questions or concerns, please contact Mr. Randy Unger, Office of Quality Assurance Director, at (575) 234-7065.

Sincerely,

Edward Ziemianski
Acting Manager

Enclosure

cc: w/enclosure		
S. Holmes, NMED	*ED	WIPP Operating Record ED
T. Hall, NMED	ED	CBFO QA File
D. Garcia, CBFO	ED	CBFO M&RC
R. Unger, CBFO	ED	*ED denotes electronic dis

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MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
June 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 June 1 through June 30, 2011, the Carlsbad Field Office received seven reportable nonconformance reports, generated by the Hanford Site/Central Characterization Project (CCP), Idaho 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 = 6/1/2011

Earliest End Date = 6/30/2011

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

<u>NCR Number- CRFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
377 NCR-SRS- 2445-11, Rev. 0	CS Savannah River Site / CCP	6/3/2011 Brandye Pyeatt	6/7/2011	OPEN	<p>Process: NDE Batch Data Report #(s): SR4RTR0136 SR4RTR0157 Container #(s): SR61125607 SR57169411</p> <p>The containers are designated as having PCBs and have observable liquid.</p> <p>Requirement Violated: CCP-PO-002, Rev 25, CCP Transuranic Waste Certification Plan, Section 3.4.1 Observable Liquid, [A] Requirements, [A.1] Liquid waste is not acceptable at the WIPP. Observable liquid containing PCBs is prohibited at the WIPP.</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Apply hold tag. 2. Remove containers from Sub Lot electronically and hardcopy. 3. WCA destroys folders. 4. Remediate. <p>Comments: None</p>
378 NCR-RL-2333- 11, Rev. 0	CR Hanford Site / CCP	6/7/2011 Veronica Waldrum	6/8/2011	OPEN	<p>Process: NDE Batch Data Report #(s): RLRTRA0177</p> <p>Container RL0074839 had the incorrect Waste Stream ID listed.</p> <p>Requirement Violated: 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."</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Operator correct Waste Stream I.D. 2. ITR review correction. 3. Submit correction to Records. 4. SPM review correction. <p>Comments: None</p>
379 NCR-RHSRS- 2939-11, Rev. 0	CS Savannah River Site / CCP	6/1/2011 Laura Nelson	6/2/2011	OPEN	<p>Process: HSG Batch Data Report #(s): SRHSG1104 Container #(s): SR526627, SR504196, SR513217A, SR118870 The containers corresponding vent and closure dates were listed in correctly on Attachment 2 of the BDR.</p> <p>Requirement Violated: CCP-TP-093 Rev 15 CCP Sampling of TRU Waste Containers section 4.3 [A] "Record the container information listed below on Attachment 2: [A.14-15] Closure date, Vent Date"</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Correct the Vent and Closure Dates on the Attachment 2 of the BDR. 2. Re-sign the attachment 2 3. Re-ITR the BDR 4. Have the SPM re-review the BDR

<u>NCR Number: CBFO Assigned Site Assigned:</u>	<u>Responsible Organization</u>	<u>Date Identified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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Comments: None

380 NCR-INL-2985- 11, Rev. 0	CI Idaho National Laboratory / CCP	6/7/2011 Barbara Broomfield	6/8/2011	OPEN	Process: HSG Batch Data Report #(s): INHSG1105 Container #(s): SNL/NM006419R C973057
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On Attachment 2 – Sample Container Data Form, the days records as the Permit Required Equilibrium Time are actually the computed container age and the days recorded as the Container Age are actually the stipulated Permit Required Equilibrium Time for the identified sampling scenario.

Requirement Violated: CCP-TP-093 Rev 15 section 4.3.2 [A.19] Permit Required Equilibrium Time (Days) and [A.17] Container Age (Days) (the difference in the number of days between the closure/vent date and the present date [e.g., date sampling for headspace]).

Actions: DGL is to correct the Permit Required Equilibrium Time and Container Age on Attachment 2. The NCR will be added to the batch. The ITR will re-review the BDR. All corrections will be submitted to records.

Comments: None

381 NCR-SRS- 2451-11, Rev. 0	CS Savannah River Site / CCP	6/16/2011 Adela Cantu	6/17/2011	OPEN	Process: AK Batch Data Report #(s): SR4RTR0174 SRSRTR0430 SRSRTR0431 SRSRTR0438 Container #(s): SR54099326-SR4RTR0174 SR54099327-SRSRTR0430 SR54099328-SRSRTR0431 SR54099329-SRSRTR0438
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Waste stream for five containers identified incorrectly on AK Tracking Spreadsheet and used by RTR operators.

Requirement Violated: CCP-TP-005, Rev. 22, CCP Acceptable Knowledge Documentation
4.12 Container Tracking Spreadsheet Maintenance AKE or Designee
4.12.1 WHEN notified of a change to the status of a container(s) identified by the SPM, CCP personnel, Host site personnel, or during the addition of containers to the waste stream inventory, THEN evaluate the change based on the data provided.
[A] IF the change is routine and DOES NOT adversely affect data, THEN GO TO step 4.12.2.
4.12.2 Update the Container Tracking Spreadsheet and post the change to the ftp site.

Actions:

1. Include a copy of this NCR for each set of corrections.
2. Correct the Waste Stream ID on Attachment 2.
3. Sign and date changes to Attachment 2 in each BDR.
4. ITR verify corrected data and re-sign BDR.
5. Send corrections to project office for SPM re-review.

Comments: None

<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>
382	CS	6/27/2011	6/29/2011	OPEN	Process: NDE Batch Data Report #(s): SRLBR0004 Container #(s): FBLBOX3405 SR57053202 SR57169401
NCR-SRS- 2452-11, Rev. 0	Savannah River Site / CCP	Adela Cantu			

Containers identified as containing PCB waste were identified at RTR as having observable amounts of liquid.

Requirement Violated: CCP-PO-002, Rev. 25, CCP Transuranic Waste Certification Plan 3.4 Physical Properties, 3.41 Observable Liquid, [A] Requirements, [A.1] Liquid waste is not acceptable at the WIPP. Observable liquid containing PCBs is prohibited at the WIPP.

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

Comments: None

383	CS	6/28/2011	6/29/2011	OPEN	Process: NDE Batch Data Report #(s): SRLBR0012 SRLBR0013
NCR-SRS- 3050-11, Rev. 0	Savannah River Site / CCP	Adela Cantu			Container #(s): SRLBR0012 SR54099011 SRLBR0013 SR54099308 SR57055404 SR57171601 SR61016602 SR60686006 SR57170705 SR60685706 SR57167701 SR61016506

The SR 425 TRUCON III code used for SLB-2 containers was incorporated into CCP-AK-SRS-1 on 5/16/11 and into CCP-SRS-4 on 6/7/11 but the NDE operators continued to use the SR 125/225 TRUCON code. SLB-2 containers are also acceptable in CCP-AK-SRS-3 but that document has not yet been revised to incorporate the SR 425 TRUCON code.

Requirement Violated: CCP-TP-053, Rev. 10, CCP Standard Real-Time Radiography (RTR) Inspection Procedure [D] Record the following data in Section 2: Waste Container Data, of Attachment 2: [D.1] Container Type. [D.2] Content (TRUCON) Code.

Actions: 1. Operator to correct TRUCON code for SLB-2 containers that were characterized after associated AK was revised to include the SR 425 TRUCON code.
2. ITR to verify TRUCON codes were corrected properly.
3. ITR to re-sign BDRs
4. Submit corrections to Records along with a copy of this NCR.
5. SPM to re-review changes to BDR.

Comments: None

Number of items on this report: 7