



Department of Energy

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

SEP 13 2011



CERTIFIED MAIL – RETURN RECEIPT

Mr. John Kieling, Acting Chief
Hazardous Waste 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, August 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, Paragraph C3-13, *Nonconformance to DQOs*. The report lists site-generated NCRs received at CBFO during the period of August 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 any questions or concerns, please contact Mr. Randy Unger, Director of the Office of Quality Assurance, at (575) 234-7065.

Sincerely,

Edward Ziemianski
Interim Manager

Enclosures

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'



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
August 2011

This summary is submitted pursuant to the requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3, Paragraph C-13, *Nonconformance to DQOs*.

During the period of August 1 through August 31, 2011, the Carlsbad Field Office received three reportable nonconformance reports, 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 = 8/1/2011

Earliest End Date = 8/31/2011

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

<u>NCR Number:</u> <u>COFO Assigned</u> <u>Site Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR Resolved</u>	<u>Date Closed</u>	<u>Deficiency</u>
384 64816	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	8/10/2011 Kathy Birch	8/11/2011	OPEN	<p>Source Type: As Found Condition Equipment ID: Z-213-101 Batch No: RTR11-00253 Container ID: 10158476</p> <p>Operator identified 2.5 pints of liquid spread between 3 quart poly bottles at the bottom of the waste, they placed the liquid in the category of 'other liquids' and answered prohibited liquids present 'No'. The poly bottles are considered internal containers making the liquid a prohibited item. Operator did not initiate an NCR for this prohibited item in accordance with INST-OI-12. Liquid amounts greater than 60 ml or 3% of the volume of the container (whichever is greater) is prohibited, and an NCR is required. Level I validation wrote the Type 3 NCR and notified SPM's, SME's, and ITR leads. Then Level I promoted the batch before an evaluation was done on the container so notification was not made to initiate a Type 1 NCR before the batch was promoted to SPM. SME notified Level I lead, and Level I lead notified SPM and had SPM demote batch to complete the data needed for the container. KLB 8/0/11</p> <p>Requirement Violated: INST-OI-12 Rev. 47, step 4.7.32</p> <p>Actions: SME notified Level I lead, and Level I lead notified SPM and had SPM demote batch to complete the data needed for the container. KLB 8/0/11</p> <p>Comments: None</p>

385 64555	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	7/27/2011 Denny Gasper	8/22/2011	OPEN	<p>Source Type: As Found Condition Requirement Violated: INST-FOI-17 step 4.2.3 and INST-FOI-16 step 4.4.8.8.1 Container ID: BN10414637, BN10414663, BN10414867, 10414694</p> <p>Indeterminate Visual Examination on Boxline Containers</p> <p>During a review of boxline visual examination, in accordance with TRUW-8.7, Timely Feedback for Visual Examination Activities, portions of the examinations appeared to be inadequate for the waste being examined. While the review was performed using the Facility video monitoring system, the reviewer did not have a three-dimensional perspective, and it did not appear to the reviewer that packages were opened sufficiently enough to expose the contents for examination.</p> <p>BN10414637 contains silver drums 10414624 and 10414615 BN10414663 contains silver drum 10414696 BN10414867 contains silver drum 10414692</p> <p>Silver drum 10414694 is not associated with a product drum at this time.</p> <p>Per review of the boxline video record, several bagged items were not removed or adequately examined for prohibited items and liquids, prior to being placed into the silver containers.</p> <p>Requirement Violated: INST-FOI-17 step 4.2.3 and INST-FOI-16 step 4.4.8.8.1</p> <p>Actions: Investigation, completed 08-18-2011, has determined that the visual examination event on container's 10414615, 10414696, 10414692 and 10414694 were inadequate and did not meet the requirement of the procedure. Also, after further investigation, the visual examination event on container 10414624 has been determined to be adequate and meets the requirements of the procedure. LJW 8/18/2011</p>
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<u>NCR Number:</u> <u>CRFO 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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QA Comment: Waste Programs Site Program Manager determined this condition to be WIPP Reportable 08-18-2011. A. Morse 08-22-11

Comments: None

386 64838	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	8/10/2011 Ronald Grise	8/22/2011	OPEN	<p>Source Type: As Found Condition Requirement Violated: INST-FOI-17 step 4.2.3 and INST-FOI-16 step 4.4.8.8.1 Container ID: BN10415432, BN10415453</p> <p>During a review of boxline visual examination, in accordance with TRUW-8.7, Timely Feedback for Visual Examination Activities, portions of the examinations appeared to be inadequate for the waste being examined. While the review was performed using the Facility video monitoring system, the reviewer did not have a three-dimensional perspective, and it did not appear to the reviewer that packages were opened sufficiently enough to expose the contents for examination.</p> <p>BN10415432 contains silver drums 10415737 and 10415742 BN10415453 contains silver drum 10415739</p> <p>After review of video from the boxline, several bags with poly bottles in them were not opened and properly examined to verify PI's and liquids were not present prior to them being placed into silver drums.</p> <p><u>Requirement Violated:</u> INST-FOI-17 step 4.2.3 and INST-FOI-16 step 4.4.8.8.1</p> <p><u>Actions:</u> Investigation, completed 08-18-2011, has determined that the visual examination event on container's 10415737, 10415742 and 10415739 were inadequate and did not meet the requirement of the procedure. LJW 8/18/2011</p> <p>QA Comment: Waste Programs Site Program Manager determined this condition to be WIPP Reportable 08-18-2011. A. Morse 08-22-11</p> <p><u>Comments:</u> None</p>
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Number of Items on this report: 3