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, October 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 October 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, Office of Quality Assurance Director, at (575) 234-7065.

Sincerely,

Edward Ziemianski
Interim Manager

Enclosure

cc: w/enclosure
S. Holmes, NMED *ED
T. Hall, NMED ED
G. Basabilvazo, CBFO ED
R. Unger, CBFO ED

WIPP Operating Record ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distrib.

CBFO-OQA:RU:MAG:11-1965:UFC 2300.00
MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
October 2011

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

During the period of October 1 through October 31, 2011, the Carlsbad Field Office received six reportable nonconformance reports, generated by the Los Alamos National Laboratory/Central Characterization Project (CCP), and the Savannah River Site/Central Characterization Project (CCP).
## List of ALL Reportable NCRs Between the following Dates:

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

<table>
<thead>
<tr>
<th>NCR Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>391</td>
</tr>
<tr>
<td>392</td>
</tr>
<tr>
<td>393</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Responsible Organization</th>
<th>Date Identified</th>
<th>Date NCR Received</th>
<th>Date Closed</th>
<th>Deficiency</th>
</tr>
</thead>
</table>
Batch Data Report #((s):)  
LA-RTR2-11-0124  
Container #((s):)  
S843978, S822232, S831742, S822236, S823752, S831744, S804520, S831738, S833692, S833670  
RTR identified container(s) generated prior to 1985 as having 90 mil baked on liner(s).  
Requirement Violated:  
CCP-TP-053, Revision 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.4.2 [H.1] states in part, “...IF any... nonconforming/prohibited items are noted during the RTR examination...”  
Actions:  
1. Responsible manager send this NCR to the AK Expert for re-evaluation in accordance with CCP-TP-005.  
2. AK Expert perform the AK re-evaluation and include a copy of documented results as an attachment to this NCR.  
3. SPM determine Final Disposition (Block 19) based on the results of re-evaluation by the AK Expert.  
Comments: None |
Batch Data Report #((s):)  
LA-RTR2-11-0125  
Container #((s):)  
S822261, S833690, S844004, S833672  
RTR identified container(s) generated prior to 1985 as having 90 mil baked on liner(s).  
Requirement Violated:  
CCP-TP-053, Revision 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.4.2 [H.1] states in part, “...IF any... nonconforming/prohibited items are noted during the RTR examination...”  
Actions:  
1. Responsible manager send this NCR to the AK Expert for re-evaluation in accordance with CCP-TP-005.  
2. AK Expert perform the AK re-evaluation and include a copy of documented results as an attachment to this NCR.  
3. SPM determine Final Disposition (Block 19 of NCR) based on the results of re-evaluation by the AK Expert.  
Comments: None |
Batch Data Report #((s):)  
SRVEFW0339  
Container #((s):)  
SR46005P  
WMP's (PP/PW) in Attachment 2 Section 2 do not match recorded WMP's (PP/PW) in Attachment 2 Section 3  
Requirement Violated:  
CCP-TP-113, Rev. 18, Section 4.4.15  
[A] Weigh or use Table 4 to estimate the weight of the Packaging Materials of the Output Waste Container, AND Total Packaging Weight.  
Comments: None |

**Date of this report:** Wednesday, November 02, 2011

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**List of ALL Reportable NCRs between selected dates:**

<table>
<thead>
<tr>
<th>Latest Start Date</th>
<th>Earliest End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/1/2011</td>
<td>10/31/2011</td>
</tr>
</tbody>
</table>

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**Page 1 of 3**
<table>
<thead>
<tr>
<th>NCR Number: NCR-SRS-3587-11, Rev. 0</th>
<th>Responsible Organization: Savannah River Site / CCP</th>
<th>Data Identified: 10/18/2011</th>
<th>Data NCR Received: 10/19/2011</th>
<th>Data Closed: OPEN</th>
<th>Deficiency</th>
</tr>
</thead>
</table>

- **[B]** Weights of the WMPs by reviewing the WMPs listed in Section 2(s) of Attachment 2, AND combine all consistent WMPs.
- **[C]** Total the WMPs, AND record the Total WMP Weight.
- **[D]** Ensure the total of the WMP weights (Section 3, Attachment 2) is within five percent of the net weight of waste of the Output Waste Container obtained from subtracting the tare weight from the gross weight (Section 1, Attachment 2).

**Actions:**
1. VE Redo calculation and resubmit
2. Resubmit through the DGL process
3. NDA EA to review data, and revise data sheets for container if applicable
4. Resubmit through DGL and SPM for re-review

**Comments:** None

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<table>
<thead>
<tr>
<th>NCR Number: NCR-394</th>
<th>Responsible Organization: Savannah River Site / CCP</th>
<th>Data Identified: 10/18/2011</th>
<th>Data NCR Received: 10/19/2011</th>
<th>Data Closed: OPEN</th>
<th>Deficiency</th>
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</thead>
</table>

- **[B]** Weights of the WMPs by reviewing the WMPs listed in Section 2(s) of Attachment 2, AND combine all consistent WMPs.
- **[C]** Total the WMPs, AND record the Total WMP Weight.
- **[D]** Ensure the total of the WMP weights (Section 3, Attachment 2) is within five percent of the net weight of waste of the Output Waste Container obtained from subtracting the tare weight from the gross weight (Section 1, Attachment 2).

**Actions:**
1. VE Redo calculation and resubmit
2. Resubmit through the DGL process
3. NDA EA to review data, and revise data sheets for container if applicable
4. Resubmit through DGL and SPM for re-review

**Comments:** None

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<table>
<thead>
<tr>
<th>NCR Number: NCR-LANL-3737-11, Rev. 0</th>
<th>Responsible Organization: Los Alamos National Laboratory / CCP</th>
<th>Data Identified: 10/18/2011</th>
<th>Data NCR Received: 10/20/2011</th>
<th>Data Closed: OPEN</th>
<th>Deficiency</th>
</tr>
</thead>
</table>

- **[B]** Weights of the WMPs by reviewing the WMPs listed in Section 2(s) of Attachment 2, AND combine all consistent WMPs.
- **[C]** Total the WMPs, AND record the Total WMP Weight.
- **[D]** Ensure the total of the WMP weights (Section 3, Attachment 2) is within five percent of the net weight of waste of the Output Waste Container obtained from subtracting the tare weight from the gross weight (Section 1, Attachment 2).

**Actions:**
1. VE Redo calculation and resubmit
2. Resubmit through the DGL process
3. NDA EA to review data, and revise data sheets for container if applicable
4. Resubmit through DGL and SPM for re-review

**Comments:** None

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**Date of this report:** Wednesday, November 02, 2011

**List of ALL Reportable NCRs between selected dates:**
CCP-AK-LANL-004, Revision 9, Section 6.5 Waste Packaging, states in part "After 1985 the 55-gallon DOT 17C drums contained baked on 90-mil poly liners..."

**Actions:**
1. Responsible manager send this NCR to the AK Expert for re-evaluation in accordance with CCP-TP-005.
2. AK Expert perform the AK re-evaluation and include a copy of documented results as an attachment to this NCR.
3. SPM determine Final Disposition (Block 19) based on the results of re-evaluation by the AK Expert.

**Comments:**
None

**Number of items on this report:** 8