



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



NOV 14 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, 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	WIPP Operating Record ED
T. Hall, NMED	ED	CBFO QA File
G. Basabilvazo, CBFO	ED	CBFO M&RC
R. Unger, CBFO	ED	*ED denotes electronic distrib.



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:

Latest Start Date = 10/1/2011

Earliest End Date = 10/31/2011

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

<u>NCR Number- CFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
391 NCR-LANL- 3736-11, Rev. 0	CL Los Alamos National Laboratory / CCP	10/17/2011 Terri-Anne Groover	10/17/2011	OPEN	<p>Process: NDE Batch Data Report #(s): LA-RTR2-11-0124 Container #(s): S843978, S822232, S831742, S822236, S823752, S831744, S804520, S831738, S833692, S833670</p> <p>RTR identified container(s) generated prior to 1985 as having 90 mil baked on liner(s).</p> <p>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..."</p> <p>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..."</p> <p>Actions:</p> <ol style="list-style-type: none"> 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. <p>Comments: None</p>
392 NCR-LANL- 2829-11, Rev. 0	CL Los Alamos National Laboratory / CCP	10/17/2011 Terri-Anne Groover	10/17/2011	OPEN	<p>Process: NDE Batch Data Report #(s): LA-RTR2-11-0125 Container #(s): S822261, S833690, S844004, S833672</p> <p>RTR identified container(s) generated prior to 1985 as having 90 mil baked on liner(s).</p> <p>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..."</p> <p>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..."</p> <p>Actions:</p> <ol style="list-style-type: none"> 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. <p>Comments: None</p>
393 NCR-SRS- 3585-11, Rev. 0	CS Savannah River Site / CCP	10/17/2011 Lorraine Hensley	10/18/2011	OPEN	<p>Process: VE Batch Data Report #(s): SRVEFW0339 Container #(s): SR46005P</p> <p>WMP's (PP/PW) in Attachment 2 Section 2 do not match recorded WMP's (PP/PW) in Attachment 2 Section 3</p> <p>Requirement Violated: CCP-TP-113, Rev.16, 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.</p>

<u>NCR Number:</u> <u>CBFO Assigned</u> <u>Site Assigned:</u>	<u>Responsible</u> <u>Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR</u> <u>Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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[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

394	CS	10/18/2011	10/19/2011	OPEN	Process: NDE Batch Data Report #(s): SRSRTR0481 SRSRTR0509 SRSRTR0420 SRSRTR0441 SRSRTR0480 Container #(s): SR55680226 SR55680316 SR611492 SR55680222 SR55680227
NCR-SRS-3587-11, Rev. 0	Savannah River Site / CCP	Carolina Soaterna			

The containers do not match the waste stream description, waste packaging description

Requirement Violated: CCP-PO-001, Revision 20, Section C-3c "If radiography and/or VE indicate that the waste does not match the waste stream description produced by AK characterization, a nonconformance report (NCR) is completed and the inconsistency resolved as specified in Section C4 (05)"

CCP-TP-053, Revision 11, Section 4.4.2 [H.2] "If the waste form DOES NOT match the Waste Stream Description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-OP-005, and record NCR number in Section 1 of Attachment 2 and a description in the Comments block."

- 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 the AK Expert for re-evaluation.

Comments: None

395	CL	10/18/2011	10/20/2011	OPEN	Process: NDE Batch Data Report #(s): LA-RTR2-11-0126 Container #(s): 58488
NCR-LANL-3737-11, Rev. 0	Los Alamos National Laboratory / CCP	Terri-Anne Groover			

RTR identified container(s) generated after 1985 as NOT 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..."

<u>NCR Number:</u> <u>CRFD 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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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

396	CL	10/18/2011	10/20/2011	OPEN	Process: NDE Batch Data Report #(s): LA-RTR2-11-0127 Container #(s): 58470, 58493
NCR-LANL-3738-11, Rev. 0	Los Alamos National Laboratory / CCP	Terri-Anne Groover			

RTR identified container(s) generated after 1985 as NOT 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..."

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: 6