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

JAN 10 2012



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, December 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 December 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,

E. Ziemianski
Edward Ziemianski
Interim Manager

Enclosure

cc: w/enclosure			
S. Holmes, NMED	*ED	R. Unger, CBFO	ED
T. Hall, NMED	ED	P. Roush, WIPP Operating Record	ED
T. Kliphuis, NMED	ED	CBFO QA File	
R. Maestas, NMED	ED	CBFO M&RC	
G. Basabilvazo, CBFO	ED	*ED denotes electronic distrib	



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
December 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 December 1 through December 31, 2011, the Carlsbad Field Office received five reportable nonconformance reports, generated by the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP), 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 = 12/1/2011

Earliest End Date = 12/31/2011

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

<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>
399 NCR-SRS- 3598-11, Rev. 0	CS Savannah River Site / CCP	12/1/2011 Beverly Schrock	12/1/2011	OPEN	<p>Process: NDE Batch Data Report #(s): SRSRTR0456 Container #(s): HBL090022 This container does not match the Waste Stream Description and Waste Matrix Code for S3110 for Solidified Inorganics due to the container being greater than 50% debris.</p> <p>Requirement Violated: 1) Section C-3c of CCP-PO-001, Rev.20, states in part, "... if radiography and/or VE indicate that the waste does not match the waste stream description produced by AK characterization, a non-conformance report (NCR) is completed and the inconsistency is resolved as specified in section C4 (Q5)." 2) CCP-TP-053, Revision 11, Section 4.42 [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-TP-005, AND record NCR number in Section 1 of Attachment 2 and a description in the Comments block.</p> <p>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 the Final Disposition (block 19) based on the results of the AK Expert re-evaluation.</p> <p>Comments: None</p>
400 67075	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	11/30/2011 Matthew Storms	12/5/2011	OPEN	<p>Title: Incomplete data reporting Source Type: As Found Condition Shipment No. IN1100510 Payload No: 95492 Equipment ID: Z-213-101 Batch No. WE04-00021 Container ID: BN10407430, 10006091</p> <p>Container 10006091 lacks appropriate quality record documentation for data affecting activities performed during visual exam activities on July 25, 2004. Container 10006091 was characterized as part of RTR03-00154, ASY03-00464 and VVE04-00021. The drum was reconciled as part of BN218.36. The container was certified partially to the RTR analysis and partially to VE activities due to the absence of RVU documentation. RVU documentation was not possible at the time of generation but was an established process at the time of reconciliation.</p> <p>Requirement Violated: MP-TRUW-8.11 section 3.2 and MP-TRUW-8.5 section 3.3 and 3.4</p> <p>Actions: The container has been overpacked into BN10407430 in preparation for shipment and disposal to WIPP. This NCR is being generated to ensure documentation of the final configuration of the container is performed. Please refer to CAR 67066 to address programmatic CAQs related to this container.</p> <p>Comments: None</p>
401 NCR-LANL- 3744-11, Rev. 0	CL Los Alamos National Laboratory / CCP	12/5/2011 Veronica Waldram	12/6/2011	OPEN	<p>Process: RTR Batch Data Report #(s): 1. LA-RTR2-05-0213 2. LA-RTR2-06-0079</p> <p>Container #(s):</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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1. S825040
2. S845080

Containers were re-evaluated due to Standing Order CCP-SO-011. The operator did not sufficiently penetrate lead shielded internal containers to identify contents.

Requirement Violated: CCP-TP-053, Revision 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.4.2 [B] states "IF a container is identified in the S5000 summary category group that CAN NOT be penetrated by the RTR method because of the presence of lead, or other shielding, THEN initiate a nonconformance report (NCR) in accordance with CCP-QP-005, CCP TRU Nonconforming Item Reporting and Control."

- Actions:**
1. Re-characterize through RTR.
 2. Remove container from Sub lot both electronically and hardcopy.
 3. WCA destroy folders.

Comments: None

402	CS	12/14/2011	12/15/2011	OPEN	Process: NDE Batch Data Report #(s): SR4RTR0217 Container #(s): SR50034901
NCR-SRS- 3601-11, Rev. 0	Savannah River Site / CCP	Carolina Soaterna			

The container type does not match the Waste Stream Description for Waste Packaging.

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 (Q5)."

CCP-TP-053 Rev. 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-QP-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 re-evaluation.

Comments: None

403	CS	12/15/2011	12/15/2011	OPEN	Process: NDE Batch Data Report #(s): SRSRTR0529 Container #(s): FBLBOX3806 FBLBOX3807
NCR-SRS- 3599-11, Rev. 0	Savannah River Site / CCP	Carolina Soaterna			

The containers have fiberboard liner and do not match the Waste Stream Description for Waste Packaging.

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 (Q5)."

CCP-TP-053 Rev. 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-QP-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

NCR Number: CBFO Assigned Site Assigned:	Responsible Organization	Date Identified By:	Date NCR Received	Date Closed	Deficiency
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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 re-evaluation.

Comments: None

Number of items on this report: 5