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,

Edward Ziemianski  
Interim Manager

Enclosure

cc: w/enclosure
S. Holmes, NMED  
T. Hall, NMED  
T. Kliphuis, NMED  
R. Maestas, NMED  
G. Basabivlazo, CBFO

R. Unger, CBFO  
P. Roush, WIPP Operating Record  
CBFO QA File  
CBFO M&RC  
*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:**

<table>
<thead>
<tr>
<th>NCR Number: NCR-SRS-3586-11, Rev. 0</th>
<th>Responsible Organization</th>
<th>Data Identified</th>
<th>Data NCR Received</th>
<th>Date Closed</th>
<th>Deficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>399</td>
<td>Savannah River Site / CCP</td>
<td>Beverly Schrock</td>
<td>12/1/2011</td>
<td>12/1/2011</td>
<td>OPEN</td>
</tr>
</tbody>
</table>

**Process:** NDE

**Batch Data Report #:** SRSRTR0456

**Container #:** 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.

**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.

**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.

**Comments:** None

<table>
<thead>
<tr>
<th>NCR Number: NCR-LANL-3744-11, Rev. 0</th>
<th>Responsible Organization</th>
<th>Data Identified</th>
<th>Data NCR Received</th>
<th>Date Closed</th>
<th>Deficiency</th>
</tr>
</thead>
</table>

**Process:** RTR

**Batch Data Report #:**
1. LA-RTR2-05-0213
2. LA-RTR2-05-0079

**Container #:**

**Comments:** None

Date of this report: Wednesday, January 04, 2012
Containers were re-evaluated due to Standing Order CCP-S0-011. 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

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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)."

**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

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

**Requirement Violated:** 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
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