



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 AUG 8 2012



CERTIFIED MAIL - RETURN RECEIPT

Mr. John E. Kieling, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

Subject: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports, July 2012

Dear Mr. Kieling:

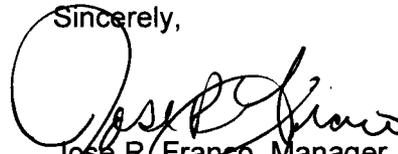
Enclosed is the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports (NCRs), transmitted pursuant to the requirements contained in the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3, Paragraph C3-13, Nonconformance to DQOs. The report lists site-generated NCRs received at CBFO during the period of July 1-31, 2012.

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 attachments were prepared under my direction or supervision according to 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 fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. Randy Unger, Director of the Office of Quality Assurance, at (575) 234-7065.

Sincerely,


 Jose R. Franco, Manager
 Carlsbad Field Office

Enclosure

cc: w/ enclosure
 E. Ziemianski, CBFO *ED
 R. Unger, CBFO ED
 S. Holmes, NMED ED
 T. Kliphuis, NMED ED
 R. Maestas, NMED ED
 WIPP Operating Record ED

CBFO QA File
 CBFO M&RC
 *ED denotes electronic distribution



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
July 2012

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 July 1 through July 31, 2012, the Carlsbad Field Office received three reportable nonconformance reports, generated by the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP), 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 - 7/1/2012

Earliest End Date - 7/31/2012

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

NCR Number: CBFO Assigned	Responsible Organization	Date Identified By:	Date NCR Received	Date Closed	Deficiency
418 NCR-SRS- 0823-12, Rev. 0	CS Savannah River Site / CCP	6/28/2012 Adela Cantu	7/2/2012	OPEN	<p>Process: HSG Batch Data Report#(s): SRHSG1213 Container#(s): SWD11367 SWD11369</p> <p>Containers SWD11367 and SWD11369 are standard waste boxes and should have been listed as packaging configuration group number 5 or 6 instead of packaging configuration group number 3 which is for 55 gallon containers.</p> <p>The permit required equilibrium time (DAC) used was based on the incorrect packaging configuration group 3. Not data affecting, actual container age in days far exceeds the DAC for SWBs.</p> <p>Requirement Violated: CCP-TP-093, Rev. 16, CCP Sampling of TRU Waste Containers</p> <p>4.3.1 For all the containers to be sampled, verify the DAC prior to Sampling by using Tables 1-5, as appropriate AND perform the following: [A.13] Package Configuration Group No. from Table 3 (Scenario 3 only) (NA for Scenario 1 or 2).</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Have the operator correct Attachment 2 for waste containers SWD11367 and SWD11369 and re-sign. 2. Have the ITR re-review and re-sign the ITR checklist. 3. Submit corrected and re-signed pages to CCP records. 4. Notify Responsible Manager when all of the documentation is submitted to CCP records. <p>Comments: None</p>
419 NCR-LANL- 1010-12, Rev. 0	CL Los Alamos National Laboratory / CCP	7/23/2012 Veronica Waldram	7/24/2012	OPEN	<p>Process: HSG Batch Data Report #(s): LAHSG1202 Container #(s): 89745, 90690, 90486, 89866, 90186, 90515, 90610, 89744, 89865, 89888, 89889, 58940, 58295, 60501, 89855</p> <p>After SPM review was completed, it was discovered that Packaging Configuration 5 with DAC of 15 days was recorded rather than Packaging Configuration 6 with DAC of 65 days. Drum age of all containers exceeded 56 days.</p> <p>Requirement Violated: CCP-TP-093, CCP Sampling of TRU Waste Containers, Revision 16, Section 4.3.1, "For all the containers to be sampled, verify the DAC prior to sampling by using Tables 1-5, as appropriate..."</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. DGL correct packaging configuration 2. ITR perform re-review 3. SPM perform re-review <p>Comments: None</p>
420 71815	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	7/26/2012 George Byram	7/26/2012	OPEN	<p>Title: Missed step in INST-OI-12 Affected Item Type: Characterization Batch Source Type: As Found Condition Batch No. RTR11-00381 Container ID: 10352063</p> <p>During characterization associated with batch RTR11-00381, the replicate container was not identified as containing</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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PCB waste as required. The container, 10352063, is comprised of RF-003 PCB contaminated sludge waste. The condition was identified during SPM validation. GTB 7/26/12

Requirement Violated: INST-OI-12 step 4.10.35.3 and substeps

Actions:

Comments: None

Number of items on this report: 3