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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
SEP 18 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, August 2012

Dear Mr. Kieling:

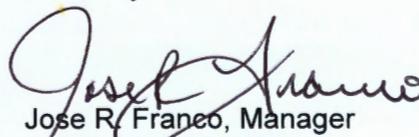
Enclosed is the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports (NCRs), transmitted pursuant to the requirements contained in the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3, Paragraph C3-13, Nonconformance to DQOs. The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

An electronic version of this documentation is provided as a courtesy for use by 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 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 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
August 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 August 1 through August 31, 2012, the Carlsbad Field Office received four reportable nonconformance reports, generated by the Hanford/Central Characterization Project (CCP), the Idaho National Laboratory/Central Characterization Project (CCP), 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 = 8/1/2012

Earliest End Date = 8/31/2012

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

NCR Number: CFO Assigned	Responsible Organization	Date Identified By:	Date NCR Received	Date Closed	Deficiency
421 NCR-RL-1517- 12, Rev. 0	CR Hanford Site / CCP	8/8/2012 Veronica Waldram	8/9/2012	OPEN	<p>Process: HSG Batch Data Report #(s): RLHSG1106 Container #(s): RLMW10700052</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 56 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: Use-As-Is. The container age was 439 and exceeded required DAC. Container has not been shipped to WIPP.</p> <p>Comments: None</p>
422 NCR-SRS- 1219-12, Rev. 0	CS Savannah River Site / CCP	8/16/2012 Charles Turner	8/21/2012	OPEN	<p>Process: AK Batch Data Report #(s): SR12FG11075 Container #(s): SR500488A</p> <p>On the day of sampling, the Closure and Vent Dates were incorrect in the AKTSS resulting in the waste container not meeting DAC.</p> <p>Requirement Violated: CCP-TP-005, Rev. 24, 4.11.1 Develop a spreadsheet which identifies the following minimum criterion for each container listed on Waste Containers List: Vent Date and New Closure Date.</p> <p>Actions: Re-sample the waste container.</p> <p>Comments: None</p>
423 NCR-LANL- 1535-12, Rev. 0	CL Los Alamos National Laboratory / CCP	8/21/2012 Veronica Waldram	8/24/2012	OPEN	<p>Process: NDE Batch Data Report #(s): LA-HERTR-12-0082 Container #(s): S845240</p> <p>Container does not have a lead liner as indicated on RTR data sheet.</p> <p>Requirement Violated: CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Revision 11, Section 4.4.2 [D.6](a) states "Describe both the rigid liner AND liner venting method (e.g., "90 millimeter liner with punctured lid," OR "No Liner")."</p> <p>Actions: 1. Operator correct data sheet. 2. ITR review corrections. 2. SPM review corrections.</p> <p>Comments: None</p>
424 NCR-INL-0437- 12, Rev. 0	CI Idaho National Laboratory / CCP	8/27/2012 Jim Vernon	8/28/2012	OPEN	<p>Process: NDE Batch Data Report #(s): INRTR5070114 Container #(s): 10093556</p> <p>Leaded rubber gloves were identified during RTR. Lead is not allowed in the ID-RF-S3114 waste stream.</p>

<u>NCR Number:</u> <u>CRFD 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>
					<p><u>Requirement Violated:</u> Section C-3c of CCP-PO-001, Revision 20, states "That is, 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), and the NCR will be dispositioned as specified in Section C3-13."</p> <p><u>Actions:</u> AKE is to perform an AK re-evaluation in accordance with CCP-TP-005</p> <p><u>Comments:</u> None</p>

Number of items on this report: 4