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, May 2013

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 C3-7, Nonconformance to DQOs. The report lists site-generated NCRs received at CBFO during the period of May 1-31, 2013.

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 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 or concerns, please contact Mr. Dennis S. Miehls, CBFO Quality Assurance Specialist, at (575) 234-7491.

Sincerely,

Jose R. Franco, Manager
Carlsbad Field Office

Enclosure

cc: Mr. M. Navarrete, CBFO
Mr. D. Miehls, CBFO
Mr. S. Holmes, NMED
Mr. T. Kliphuis, NMED
Mr. R. Maestas, NMED

C. Smith, NMED
WIPP Operating Record
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
MONTHLY SUMMARIZATION REPORT

FOR

SITE-GENERATED NONCONFORMANCE REPORTS

May 2013

This summary is submitted pursuant to the requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3, Paragraph C3-7, Nonconformance to DQOs.

During the period of May 1 through May 31, 2013, the Carlsbad Field Office received two reportable nonconformance reports, generated by the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP), and the Los Alamos National Laboratory/Central Characterization Project (CCP).
<table>
<thead>
<tr>
<th>NCR Number:</th>
<th>Responsible Organization</th>
<th>Date Identified</th>
<th>Date NCR Received</th>
<th>Data Closed</th>
<th>Deficiency</th>
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<td>Batch Data Report #(s):</td>
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<td>LA-HERTR-13-0020</td>
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<td>2LANDA1121</td>
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<td>LA13FG12026 (93100)</td>
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<td>LA13FG12029 (93102)</td>
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<td>Container #(s):</td>
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<td>93100, 93102</td>
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<td>LA13FG12029 (93102)</td>
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</tbody>
</table>

Waste containers 93100 and 93102 were characterized in the wrong order resulting in the wrong container identification number being recorded on the video and the Attachment 2 datasheets possibly because the containers were incorrectly positioned on the turntable attachment by waste handlers. Replicate scan (container 93102) was performed similarly.

**Requirement Violated:**
CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Revision 12, Section 4.4 RTR System Operation

4.4.1.2 Waste Container Scanning
NOTE: Waste Container Identification (ID) Numbers shall be obtained by direct visual observation. An Attachment 2 must be completed for all waste containers examined.

[A] Enter the appropriate scan information (e.g., Container ID No., Date) on the video display.

4.5 Replicate Scan
NOTE: The Replicate Scan will be performed under the same uniform conditions as a routine scan of a waste container in Section 4.4.

**Actions:**
1. RTR Lead Operator - Rescan containers 93100 and 93102 to verify the data for the two containers is switched.
2. RTR Lead Operator - Rerun container 93100 as 93102 and 93102 as 93100 throughout the BDR. Annotate the data sheets referencing this NCR and noting the discrepancy with the numbers called out on the video.
3. RTR ITR - Complete a review of the BDR.
4. SPM complete validate of the RTR BDR.
5. NDA - Correct the percent fill values and weights for the subject containers in the BDR and reanalyze the containers.
6. NDA ITR - Complete a review of the BDR.
7. SPM complete validation of the NDA BDR.
8. FGA correct the container type for the subject containers in the corresponding BDR.
9. FGA ITR - Complete a review of the BDRs.
10. SPM complete validation of the FGA BDRs.

**Comments:** None
indicating it is a RF-007. The WTS RTR analysis record indicates it is a RF-001, probably stemming from a comment in the General AMWTP Container Screen indicating First Stage Sludge assignment. No quality record correction or RVU has been completed to substantiate the change of the IDC.

Requirement Violated: MP-TRUW-8.11 and MP-TRUW-8.5

Actions: WTS indicates the IDC of container 10013227 is RFETS 001, and the AK comment verifies it is First Stage Sludge. The manual record in EDMS from 2004 (which predates the full electronic WTS) will have to be re-worked to indicate the correct IDC for this container. SPM/Recon will rework the historical record to match WTS, which will resolve this NCR.

The programmatic issues associated with the CAR will be handled separately in a Corrective Action Report (CAR).

Comments: None

Number of items on this report: 2