Mr. John E. Kieling, Chief
Hazardous Waste 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, February 2014

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 (WIPP) Hazardous Waste Facility Permit (HWFP), Attachment C3, Paragraph C3-7, Nonconformance to DQOs. The report lists Site-Generated NCRs received at the CBFO during the period of February 1-28, 2014.

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 any questions concerning the enclosed report, please contact Mr. Michael R. Brown, Director, CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,

[Signature]

Jose R. Franco, Manager
Carlsbad Field Office

Enclosure

cc: w/enclosure
T. Kliphuis, NMED
S. Holmes, NMED
R. Maestas, NMED
C. Smith, NMED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
MONTHLY SUMMARIZATION REPORT
 FOR
 SITE-GENERATED NONCONFORMANCE REPORTS
 February 2014

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 February 1 through February 28, 2014, 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: NCR-LANL-0115-14, Rev. 0</th>
<th>Responsible Organization: INL Advanced Mixed Waste Treatment Project (formerly INEEL)</th>
<th>Date Identified: 2/11/2014</th>
<th>Date NCR Received: 2/12/2014</th>
<th>Date Closed: OPEN</th>
<th>Deficiency</th>
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</thead>
<tbody>
<tr>
<td>83730</td>
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<td>Title: Impenetrable Waste not identified at RTR or ITR. Category: WIPP Data Affected Item Type: Container ID Source: Type: As Found Condition Container ID: 10486533 After review of the AV recording by the RTR/SME the waste appears to be Impenetrable. Unable to verify the absence of prohibited items. This condition was not identified and an NCR was not initiated as required per INST-OI-12 and MP-TRUW-8.8. MS 02/11/2014 Requirement Violated: INST-OI-12 Rev. 52 4.6.37.1, MP-TRUW-8.8 3.1.3.14 Actions: Develop training needs for RTR operator and ITR, and document on Form 1039 Conduct training with RTR operator and ITR, and document on Form 1039 Attach objective evidence of completed training (Form 1039s for operator and ITR) Include impenetrable requirements for waste in an upcoming RTR tailgate to disseminate to RTR operators/ITR’s Attach objective evidence of completed training Comments: None</td>
</tr>
<tr>
<td>440</td>
<td>CCP-TP-053. Revision 14, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.3, Note “Video/audio recording of the RTR examination MUST be produced for all waste containers. The Image Test is performed once per day.”</td>
<td>Date Identified: 2/13/2014</td>
<td>Date NCR Received: 2/13/2014</td>
<td>Date Closed: OPEN</td>
<td>Process: NDE Batch Data Report # (s): LA-HERTR-13-0124 Container # (s): 54206, 54213, 53892, 53878 Image test was completed on 12/13/2013 and RTR examinations, replicate scan and independent observation were completed on 12/20/13. Requirement Violated: CCP-TP-053. Revision 14, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.3, Note “Video/audio recording of the RTR examination MUST be produced for all waste containers. The Image Test is performed once per day.” Actions: 1. RTR Operator review video/audio recorded media to determine and provide verification to SPM that an image test was performed on 12/20/13. Comments: None</td>
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</tbody>
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Number of Items on this report: 2