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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, September 2015

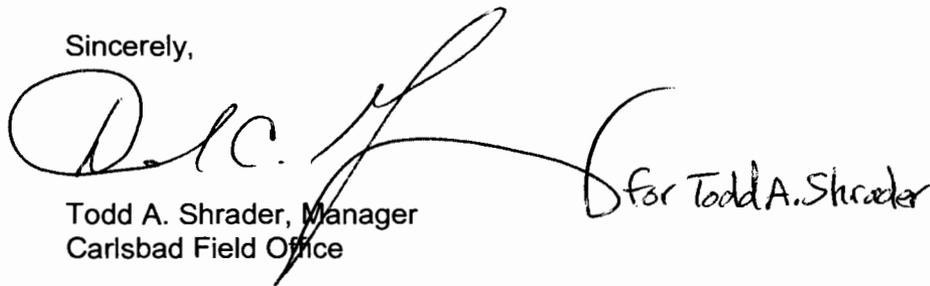
Dear Mr. Kieling:

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 September 1-30, 2015.

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 fines and imprisonment for knowing violations.

If you have questions or concerns, please contact Mr. Michael R. Brown, Director, CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,


Todd A. Shrader, Manager
Carlsbad Field Office

Enclosure

cc: w/enclosure
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S. Holmes, NMED
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Mr. John E. Kieling

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MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
September 2015

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 September 1 through September 30, 2015, the Carlsbad Field Office received two reportable nonconformance reports, generated by the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP).

List of ALL Reportable NCRs between the Selected Dates

<u>NCR Number</u> CRFD Assigned	<u>Responsibility</u> Organization	<u>Date Identified</u> By:	<u>Date NCR</u> Received	<u>Date Closed</u>	<u>Description</u>
452 97765	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	9/24/2015 George Byram	9/24/2015	OPEN	<p>Title: Incorrect Procedure Revision Identified in Batch Category: WIPP Data Affected Item Type: Characterization Batch Affected Item: Batches Source Type: As Found Condition Batch No. VEB15-00660, VEB15-00661, VEB15-00663</p> <p>Description of Condition: During SPM validation of visual examination data, it was discovered that an incorrect procedure revision was identified for FOI-17. The approved revision at the time was FOI-17 R29; however FOI-17 R30 was incorrectly listed. Investigation has determined that this issue affects containers which underwent visual examination on 9/23 and 9/24, in batches VEB15-00660, VEB15-00661, VEB15-00662 and VEB15-00663. Batch VEB15-00660 contains some drums characterized on 9/22, and these containers are unaffected by this issue. In addition, VEB15-00662 is an open batch, visual examination operators are currently resolving the issue for this batch, and as a result the batch has not been identified in the Batch ID field of this NCR. In discussion with QA Management it was determined that generation of a single Type-1 NCR was appropriate due to this being a new condition and that the anticipated remediations for all affected containers would be the same. GTB 9/24/15</p> <p>Requirement Violated: FOI-17, TRUW-8.8</p> <p>Actions: TBD</p> <p>Comments: None</p>
453 97814	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	9/27/2015 George Byram	9/28/2015	OPEN	<p>Title: Incorrect Procedure Revision Identified in RVU Category: WIPP Data Affected Item Type: Container ID Affected Item: Drum 10562228 Source Type: Surveillance Container ID: 10562228</p> <p>Description of Condition: The issue identified in this NCR was discovered during investigation into the extent of condition associated with NCR 97765, where the incorrect procedure revision for INST-FOI-17 was identified in VEB15-00660, VEB15-00661 and VEB15-00663. This issue is limited to the visual examination batches identified on NCR 97765, and the container associated with NCR 97814. The original visual examination data for container 10562228 in VEB15-00656 is acceptable; however during processing in the treatment facility a catch pan was added to the drum and this was documented on an RVU (analysis ID 0000343843). The RVU was generated on 9/23 and incorrectly lists the operating procedure as INST-FOI-17 R30 rather than INST-FOI-17 R29. GTB 9/28/15</p> <p>Requirement Violated: FOI-17, TRUW-8.8</p> <p>Actions: TBD</p> <p>Comments: None</p>

Number of Items on this report: 2

Deficiency

Date Closed

Date NCR Received

Date Identified

Responsible Organization

By:

**NCR Number:
CRFO Assigned
Site Assigned:**