



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
JUL 11 2017



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, June 2017

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 June 1 – 30, 2017.

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 of the CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,

[Handwritten Signature]
 Todd Shrader, Manager
 Carlsbad Field Office
for Todd Shrader

Enclosure

cc: w/enclosure
 J. Carswell, CBFO *ED
 M. Brown, CBFO ED
 R. Maestas, NMED ED
 D. Biswell, NMED ED
 CBFO QA File
 CBFO M&RC
 *ED denotes electronic distribution



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
June 2017

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 June 1 through June 30, 2017, the Carlsbad Field Office received two reportable nonconformance reports, generated by the Advanced Mixed Waste Treatment Project (AMWTP) Fluor Idaho and Los Alamos National Laboratory/ Central Characterization Project (CCP).

Non-Conformance Report (NCR)

Records received between: 6/1/2017 and: 6/30/2017

NCR Number: 459
Site Assigned: 111353
Responsible Organization: Advanced Mixed Waste Treatment Project Fluor Idaho
Date Identified: 6/13/2017 **Date Received:** 6/19/2017
Identified By: Joseph Poirier
Deficiency: Title: Impenetrable Waste not identified with an NCR
Category: WIPP Data
Affected Item Type: Container ID
Affected Item: 10599170
Source Type: Unplanned Observation
Batch No. RTR17-00086
Container ID: 10599170

During characterization (RTR) the waste was not properly identified as impenetrable and an NCR was not generated for this prohibited condition as required. During Level 1 validation the impenetrable nature of the waste was not correctly identified and an NCR for the nonconformance was not generated. JP 06/13/17

Requirement Violated: MCP-4005 and TPR-8089

Actions: For resolution of the identified issue and closure of this NCR, the following actions will be required:

- Generation of a Type-3 NCR against the container for the prohibited impenetrable condition,
- Rework of the RTR batch data associated with the container to correctly reflect the presence of impenetrable waste,
- RTR SME review of the recent Operator and RTR ITR performance to determine if additional actions or remedial training is necessary. GTB 6/15/17

Comments: None

NCR Number: 458
Site Assigned: NCR-LANL-0168-17, Rev. 0
Responsible Organization: Los Alamos National Laboratory / CCP
Date Identified: 6/5/2017 **Date Received:** 6/5/2017

Identified By: Laura Turner

Deficiency: Process: VE
Batch Data Report #(s): LAVE550465
Container #(s): 67777
The operators answered the questions in Section 4 of Attachment 2 for the container in block 3 inaccurately

Requirement Violated: CCP-TP-113 Rev. 20, Section 4.4.16 [C] states in part, "If packaged item(s) were direct loaded into Output Waste Container, then answer the questions in Section 4 with all explanations (as needed) annotated in the Comments block of Section 4 of Attachment 2"

Actions: 1. Re-characterize drum in block 3 at VE or Characterize at HERTR

Comments: None

Number of Items in this report: 2