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, July 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 July 1 – 31, 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,

Todd Shrader, Manager
Carlsbad Field Office

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

July 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 July 1 through July 31, 2017, the Carlsbad Field Office received one reportable nonconformance report, generated by the Advanced Mixed Waste Treatment Project (AMWTP) Fluor Idaho.
Non-Conformance Report (NCR)
Records received between: 7/1/2017 and: 7/31/2017

NCR Number: 460
Site Assigned: 112041
Responsible Organization: Advanced Mixed Waste Treatment Project Fluor Idaho
Date Identified: 7/5/2017  Date Received: 7/11/2017
Identified By: George Byram
Deficiency: Title: 10621283 within BN10622094 did not have a valid WIPP opening performance check (DCAL1999)
Category: WIPP Data
Affected Item Type: Container ID
Affected Item: BN10622094, 10621283
Source Type: As Found Condition
Container ID: BN10622094, 10621283

On 06/20/2017 a daily performance check was ran on system Z-390-100 in WMF-676, and a 2-σ error was identified. Immediately thereafter a production drum (10621283) was assayed, and this was then following by a passing daily performance check. The performance check drum associated with the 2-sigma failure was never signed by the operator in WTS. This resulted in the failed performance check drum not showing on the batching screens in WTS for the Independent Technical Reviewer, and only the previous passing performance check drum showing available for batching. The assay data for drum 10621283 was batched and validated, however due to the 2-σ error there was not a passing opening performance check for this individual drum. The drum was compacted and placed into product drum BN10622094.

Requirement Violated: TPR-8025 Rev 2 and Rev 3, Step 4.2.2.4.4.2 and MCP-4005 Rev 0, Step 3.3.1.2.3
Actions: Disposition Description: CAR 112058
Comments: N/A
Number of Items in this report: 1