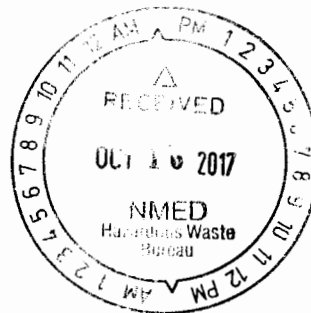


ENTERED



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
OCT 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, September 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 September 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, CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,

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

Enclosure

- cc: w/enclosures
 - J. Carswell, CBFO *ED
 - M. Brown, CBFO ED
 - R. Maestas, NMED ED
 - D. Biswell, NMED ED
- *ED denotes electronic distribution



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
September 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 September 1 through September 30, 2017, the Carlsbad Field Office received two reportable nonconformance reports, generated by the Advanced Mixed Waste Treatment Project (AMWTP) Fluor Idaho.

Non-Conformance Report (NCR)

Records received between: 9/1/2017 and: 9/30/2017

NCR Number: 462

Site Assigned: 114285

Responsible Organization: Advanced Mixed Waste Treatment Project Fluor Idaho

Date Identified: 9/14/2017 **Date Received:** 9/14/2017

Identified By: Steve Tallman

Deficiency: Title: RTR Procedural Non Compliance
Affected Item Type: Container ID
Affected Item: 10579544, 10580051
Source Type: As Found Condition
Container ID: 10579544, 10580051

Description of Condition:

Containers 10579544 and 10580051 were identified as being PCB contaminated debris waste. A type 3 NCR is required to identify this condition. Level 1 validation was completed on these containers, and no NCR had been identified or generated, as required by MCP-4005.

Requirement Violated: MCP-4005 Rev 1, step 3.1.3.10.9 and TPR-8089 Rev 3, 4.6.35

Actions: Disposition Description:
Actions to be taken;
1. Generate type 3 NCRs for containers 10579544 and 10580051 to document the PCB contaminated debris waste
2. complete validation of RTR17-00143 and ensure data has been corrected as needed
3. RTR SME will evaluate the training needs for the RTR ITR involved, and document on form 361.77
4. RTR SME will evaluate whether any additional training is needed

Comments: N/A

NCR Number: 461

Site Assigned: 114044

Responsible Organization: Advanced Mixed Waste Treatment Project Fluor Idaho

Date Identified: 9/6/2017 **Date Received:** 9/6/2017

Identified By: Steve Tallman

Deficiency: Title: (3) RTR Batches affected by expired visual acuity RTR requirement for RTR operator
Affected Item Type: Characterization Batch
Affected Item: (3) RTR batches completed by RTR operator with expired visual acuity
Source Type: As Found Condition
Finding#: RTR operator identified visual acuity expired 7/12/17, was allowed to access WTS , perform WIPP RTR insp.
Batch No. RTR17-00124, RTR17-00132, and RTR17-00154

A RTR operator identified that his visual acuity had expired on 7/12/17 on 8/30/17 while completing his RTR re-qualification package. The operator was involved in completing RTR batches RTR17-00124, RTR17-00132, and RTR17-00153. FRM-1866 is utilized to ensure that the annual visual acuity requirement is current, and it appears that the data for the form was incorrectly input, allowing WTS access with an expired visual acuity. This NCR is WIPP Reportable due to RTR17-00124 Batch has been through SPM review.

CAR 114048 initiated in TRACKWISE

QA Note 09/06/17:

RTR17-00124 Batch is at AP

RTR17-00132 Batch is at SPM

RTR17-00154 Batch is in rework

Requirement Violated: MCP-4005 Rev 1, Step 3.1.3.7 and TPR-8089 Rev 3, Note above Step 4.2.2

Non-Conformance Report (NCR)

Records received between: 9/1/2017 and: 9/30/2017

Actions: CAR 114048 initiated in TRACKWISE

Comments: N/A

Number of Items in this report: 2