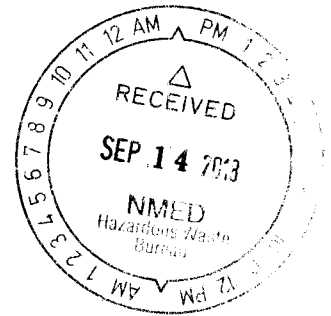




ENTERED

**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

**SEP 11 2018**



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, August 2018

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 August 1-31, 2018.

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 questions or concerns, please contact Mr. Donald C. Gadbury, Director, CBFO Office of Quality Assurance, at (575) 234-7372.

Sincerely,

Todd Shrader, Manager  
Carlsbad Field Office

Enclosure

cc: w/enclosure  
J. Carswell, CBFO ED  
D. Gadbury, CBFO ED  
R. Maestas, NMED ED  
D. Biswell, NMED ED  
H. Tellez, NMED ED  
M. McLean, NMED ED

CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution



**MONTHLY SUMMARIZATION REPORT**  
**FOR**  
**SITE-GENERATED NONCONFORMANCE REPORTS**  
**August 2018**

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 August 1 through August 31, 2018, the Carlsbad Field Office received one reportable nonconformance report, generated by the Savannah River Site/Central Characterization Program (SRS/CCP).

# Non-Conformance Report (NCR)

Records received between: 8/1/2018 and: 8/31/2018

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**NCR Number:** 457

**Site Assigned:** NCR-SRS-0617-18, Rev. 0

**Responsible Organization:** Savannah River Site / CCP

**Date Identified:** 8/14/2018

**Date Received:** 8/16/2018

**Identified By:** Jake Knox

**Deficiency:** Process: AK  
Batch Data Report #(s): SRLBR0078  
Container #(s): WMAPSWB547

Additional AK information was obtained by the AKE, in which generator site RTR identifies a hydraulic press or ram present in WMAPSWB547, which is a PCB item. After additional review of the CCP RTR scan of container WMAPSWB547, it was determined that the press/ram was indeed present. CCP RTR also identifies the presence of observable liquid, making this container prohibited from shipment to WIPP.

**Requirement Violated:** DOE/WIPP-02-3122, Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, Revision 8.0, Section 3.4.1: "The disposal of free-flowing PCB liquids (i.e., observable liquids) is prohibited except that incidental liquids such as, but not limited to, rainwater, groundwater, condensate, leachate, load separation and dust control liquid, are allowed in PCB/TRU and PCB/TRU mixed bulk product waste containers less than 1 percent by volume of the outermost container at the time of radiography or visual examination."

**Actions:**

1. Remove from WDS
2. Remove from Lot
3. Remove from AK Tracking Spreadsheet
4. Return to host site.

**Comments:** None

**Number of Items in this report:** 1