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 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 September 1-30, 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
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

September 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 September 1 through September 30, 2018, the Carlsbad Field Office received two reportable nonconformance reports, generated by the Advanced Mixed Waste Treatment Project (AMWTP) Fluor Idaho and Oak Ridge National Laboratory/Central Characterization Program (ORNL/CCP).
## Non-Conformance Report (NCR)

Records received between: 9/1/2018 and: 9/30/2018

<table>
<thead>
<tr>
<th>NCR Number: 464</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Assigned: 122482</td>
</tr>
<tr>
<td>Responsible Organization: Advanced Mixed Waste Treatment Project Fluor Idaho</td>
</tr>
<tr>
<td>Date Identified: 9/12/2018</td>
</tr>
<tr>
<td>Date Received: 9/13/2018</td>
</tr>
<tr>
<td>Identified By: Shannon Flores</td>
</tr>
</tbody>
</table>

**Deficiency:**
- **Title:** TDOP BN10653295 lid and body serial #'s do not match from manufacture
- **Category:** Supplier Quality
- **Affected Item Type:** Payload ID
- **Affected Item:** TDOP BN10653295
- **Source Type:** As Found Condition
- **ICP Project:** RWMC-AMWTP
- **Payload No.:** BN10653295
- **PO Number:** 17-8678
- **Container ID:** BN10653295

**Description of Condition:**

Loaded TDOP Waste Tracking System (WTS) ID, BN10653298 was identified with nonmatching serial numbers TDOP Lid SN 107128 and TDOP Body SN 170128 during inspection performed by the Transportation Certification Official (TCO) in accordance with CPP-TP-033 Rev 23, CCP Shipping of CH TRU Waste.

Additionally during payload assembly CCP-TP-086 Rev 19, Step 4.2.1(A), Operations failed to identify serial numbers did not match during loading of WTS ID BN10653298.

During Receipt Inspection at Fluor Idaho, MCP-4022 Rev 1, Step 4.2.3.1 review of Receipt Inspection Documentation (see attached) Fluor Idaho, failed to identify that the TDOP Lid and Body Serial Numbers did not match.

Review of NWP TDOP material verifications (see attached Receipt Inspection Documentation) did not identify that the lid and body serial numbers did not match.

**Determination Results:** Public Perception IV Negligible; overall severity level is IV

TDOP BN10653295 is on-site AMWTP

CAR 122504 issued 09/13/18

**Requirement Violated:**
- CCP-TP-033 Rev 33; CCP-TP-086, Rev. 19 step 4.2.1[A] and MCP-4022 Rev 1 Step 4.2.3.1

**Actions:**
- CAR 122504 issued 09/13/18

**Comments:** N/A

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<table>
<thead>
<tr>
<th>NCR Number: 463</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Assigned: NCR-RHORNL-0495-18 Rev. 0</td>
</tr>
<tr>
<td>Responsible Organization: Oak Ridge National Laboratory / Central Characterization Project (CCP)</td>
</tr>
<tr>
<td>Date Identified: 9/6/2018</td>
</tr>
<tr>
<td>Date Received: 9/10/2018</td>
</tr>
<tr>
<td>Identified By: Ryan Martin</td>
</tr>
</tbody>
</table>

**Deficiency:**
- **Process:** RH-NDE
- **Batch Data Report #:** OR-RH-RTR6-0001
- **Container #:** X10C0100115C

**Contents of container does not match waste stream description. Container has scrap metal, which is not mentioned in the AK.**

**Requirement Violated:**
- CCP-TP-053, Standard Real Time Radiography (RTR) Inspection Procedure, Rev. 16, Section 4.4.3 [C]: "IF the physical form of the waste DOES NOT match the Waste Stream Description and/or the Waste Matrix Code, THEN ... Initiate an NCR in..."
Non-Conformance Report (NCR)

Records received between: 9/1/2018 and: 9/30/2018

accordance with CCP-QP-005, CCP TRU Nonconforming Item Reporting and Control.

Actions:
1. Responsible manager will send NCR to AKE for discrepancy resolution in accordance with CCP-TP-005.
2. Once discrepancy is resolved, SPM will determine the Final Disposition.

Comments: N/A

Number of Items in this report: 2