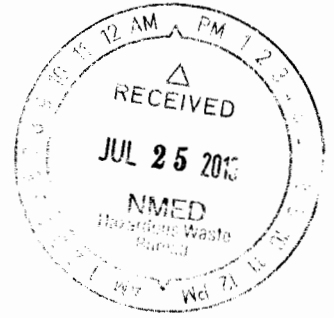




ENTERED

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

JUL 19 2019



Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

CERTIFIED MAIL: RETURN RECEIPT

Subject: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports, June 2019

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, 2019.

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,

J.R. Stroble FOR

Kirk Lachman, Acting Manager
Carlsbad Field Office

Enclosure

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



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
June 2019

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, 2019, the Carlsbad Field Office received two reportable nonconformance reports, generated by the Advanced Mixed Waste Treatment Project (AMWTP) Fluor Idaho and Idaho National Laboratory/Central Characterization Program (INL/CCP).

Non-Conformance Report (NCR)

Records received between: 6/1/2019 and: 6/30/2019

NCR Number: 469
Site Assigned: NCR-RHINL-0642-19, Rev. 0
Responsible Organization: Idaho National Laboratory / CCP
Date Identified: 6/3/2019 **Date Received:** 6/6/2019
Identified By: David Moody
Deficiency: Process: RH RTR
Batch Data Report #(s): INLRHRTR18025
Container #(s): 10027321-2A-1

The Waste Container Inventory and Contents for the container incorrectly identified the waste container contents.

Requirement Violated: Incorrect identification the waste container contents during RTR per CCP-TP-508, Revision 11, section 4.3.2.

Actions: The NCR gives a "Rework" disposition for the Batch Data Report. These rework steps include:

1. Operator will re-review and revise the Waste Container Inventory and Contents of this container and assigned corrected inventory descriptions and waste material parameters on Attachment 2.
2. ITR to review corrections and re-sign Attachment 3.
3. Submit corrections to Records
4. SPM to add corrections and NCR to BDR
5. SPM to re-review revised BDR.

Comments: None

NCR Number: 468
Site Assigned: 127543
Responsible Organization: Advanced Mixed Waste Treatment Project Fluor Idaho
Date Identified: 6/16/2019 **Date Received:** 6/18/2019
Identified By: Mark Sorenson
Deficiency: Title: Prohibited liquids on OIO
Category: WIPP
Affected Item: 10662693
Affected Item Type: Characterization Batch
Source Type: As Found Condition
ICP Project: RWMC-AMWTP
Batch No. RTR19-00015
Container ID: 10662693

A prohibited amount of liquid (1/4 cup) was identified in a beaker on container 10662693. This liquid was not documented as prohibited in WTS and no NCR was initiated. This issue was also missed at ITR. This is the OIO for Batch RTR19-00015. CAR 127548 initiated for process issue

Requirement Violated: TPR-8089 Rev 6, Steps 4.6.28 and 4.6.31
WIP-2 Rev 2, Steps 4.2.3.12.4, 4.2.3.16

Actions: Disposition Description:
CAR 127548 initiated in TRACKWISE for process issue.

Actions to be taken;

1. An evaluation of container 10662693 will be completed. If the liquid condition is found to be prohibited, a type 3 NCR will be generated, and the WTS data will be updated as needed.
2. The RTR SME will determine the remedial training needs for the affected RTR operators and RTR ITR, and document on form 361.77

Non-Conformance Report (NCR)

Records received between: 6/1/2019 and: 6/30/2019

3. The RTR SME will determine what lessons learned can be developed, and will generate a tailgate for all qualified RTR operators.

Comments: None

Number of Items in this report: 2