



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221
June 8, 2000

JUN 2000
RECEIVED

John Kieling, Hazardous Waste Permits Program Manager
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502-6110

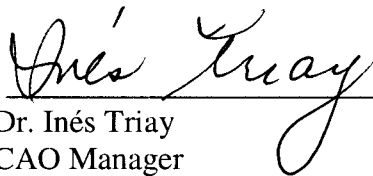
Subject: Transmittal of the Carlsbad Area Office Monthly Nonconformance Report Summary

Dear Mr. Kieling

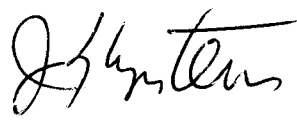
Enclosed is the Carlsbad Area Office (CAO) Monthly Summarization Report for Site-Generated Nonconformance Reports for the period of April 30, 2000 through May 27, 2000. The Summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, Section titled, *Nonconformance to DQOs*.

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 fine and imprisonment for knowing violations.

Please contact Samuel A. Vega of my staff at (505) 234-7423 if you have any questions or concerns.



Dr. Inés Triay
CAO Manager



Joe Epstein, Manager
Westinghouse Waste Isolation Division

CAO:QA:SAV:NM 00-0805 UFC 1000.00



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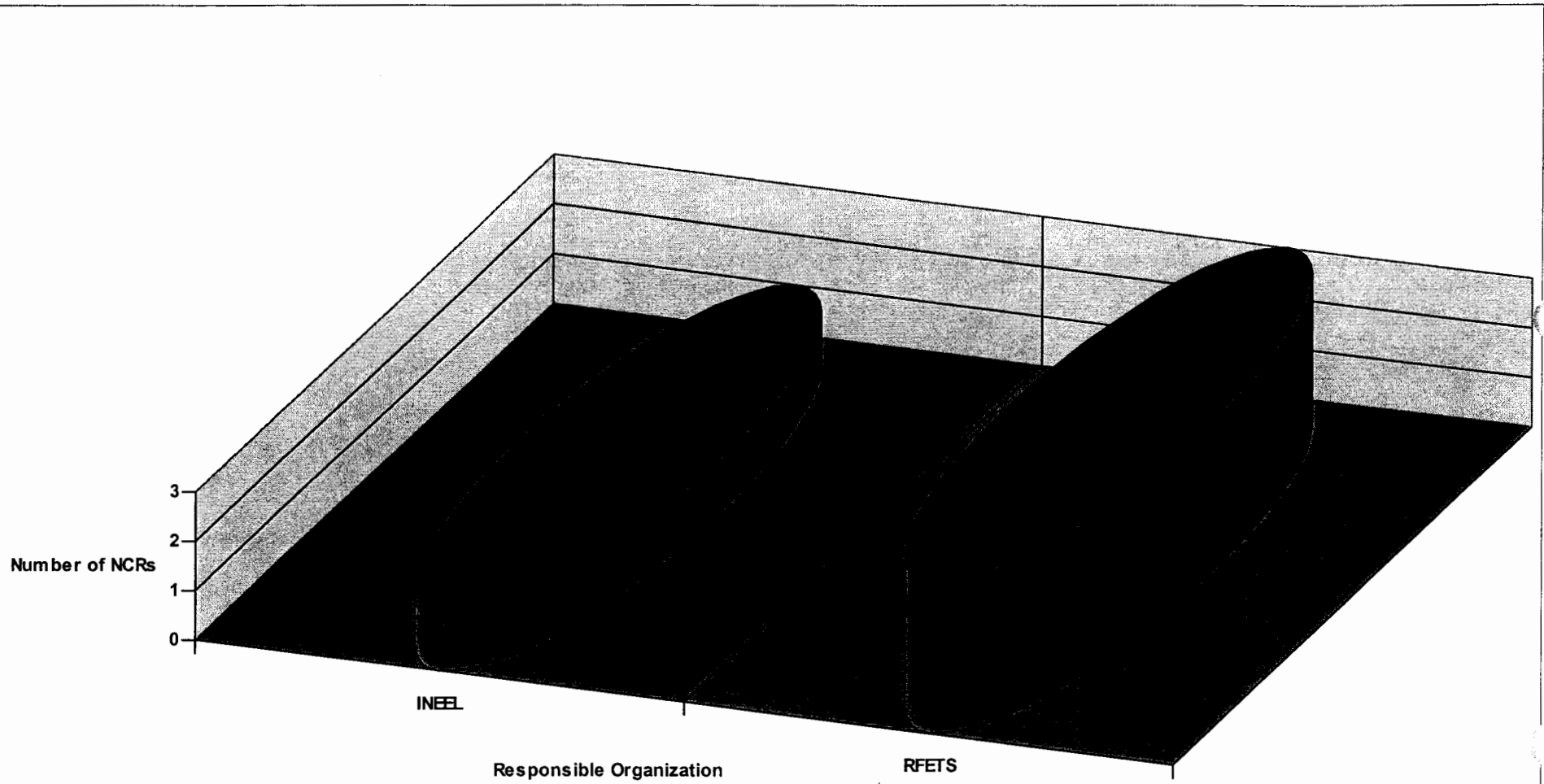
MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
APRIL 30 – MAY 27, 2000

This summary is submitted in compliance with the requirements of the WIPP Hazardous Waste Permit, Attachment B3, Section titled, Nonconformance to DQOs.

During the period of April 30, 2000 through May 27, 2000, there were four (4) non-conformance reports identified by two TRU waste generator sites. Three (3) NCRs were received from the Rocky Flats Environmental and Technology Site (RFETS), representing 75% of the total number of NCRs received. One (1) NCR was received from the Idaho National Engineering and Environmental Laboratory (INEEL), representing 25% of the total number of NCRs received during the reporting period.

This summary contains a graph indicating the number of NCRs generated for each site.

Number of NCRs Issued by Responsible Organization



	INEEL	RFETS
Sum Of NCRs	1	3

Date of this Report:

05/30/2000

Start Date = 04/30/2000

End Date = 05/27/2000

List of ALL NCR Between the following Dates

Note: This report contains only data between the target dates shown.

Latest Start Date = 04/30/2000
 Earliest End Date = 05/27/2000

NCR Number	Responsible Organization	Date Notified	Date NCR Received	Date Closed	Deficiency
Audit Number		By:		TCC:	
7	RF	05/04/2000	04/15/2000		<p>The representativeness for sampling drum D71501 was not maintained. The concentration of carbon tetrachloride for field sample RF022500ROB159D1 taken on 2/25/00 was 10599.8 ppmV. This high carbon tetrachloride result conflicts with an initial field sample ID RF071698ROB345 taken on 7/16/98 and a final field sample ID RF041000ROB325 taken on 4/10/00. The first and last field sample results both indicate no detectable amount of carbon tetrachloride.</p> <p>Requirement Violated: 95-QAPJP-0050, Section B3-11</p> <p>Actions: An investigation into the cause of the deficiency was immediate - the exact cause of the discrepancy could not be identified. Review of paperwork and log books uncovered no paperwork or traceability errors / problems and it was concluded that some sort of sample mix up occurred. From the sample results, the sample appears to have been collected from some other drum by mistake, possibly an IDC 801 drum. Since the exact cause of the sample mix up could not be established, all samples collected on 2/25/00 for batch data reports HVOC-DP-00243, GMSP-DP-00393 and GMSP-DP-00934 shall be rejected. This NCR shall be added to the above mentioned three batch data reports and the sample data clearly rejected. In addition, all WEMS entries for samples collected on 2/25/00 associated with these three batch data reports will be deleted.</p>
		Eric D'Amico			
8	RF	05/04/2000	04/15/2000		<p>During the Level 2 (Project) Validation and Verification Phase , on Drum DA-4834, on the Waste Characterization RTR Report: in the RTR Data and the Inventory of Waste Container Contents Sections the Data was incorrect in WEMS.</p> <p>Requirement Violated: Pro-940-WIPP-010</p> <p>Actions: Enter the Correct RTR Data in the WEMS for DA-4834 following an evaluation to ensure traceability is maintained. To prevent recurrence of a similar problem, corrective actions include the modification of PRO-940-WIPP-010 to include providing instruction on verifying the seven digit control number (Extended Number) as well as the Drum Number during the Validation and Verification Phase.</p>
		Linda Williams			

NCR Number	Responsible Organization	Date Notified	Date NCR Received	Date Closed	Deficiency
Audit Number		By:		TCC:	
9	RF	05/05/2000	05/05/2000		RTR Data Sheets for Drum Number DA-4834 appear in two (2) batch reports, 6T-1611 and 6T-1607 and the drum scan is on two (2) videotapes, 6T-1611 A & B and 6T-1607 A & B. Requirement Violated: 4-W30-NDT-00664, Section 7.2(19) and (23) Actions: Personnel error occurred when entering the Drum number on RTR Data Sheets for Batch 6T-1611 The accurate drum number should be DA-4838. Traceability was not lost due to accurate recording of the control number for each RTR data Sheet. RTR Operations to revise the drum number on RTR Data Sheet for Batch 6T-1611 and Daily Operations Log, from DA-4834to DA-4838 in accordance with 4-W30-NDT-00664, Section 8.1, 3rd bullet. Place a copy of the NCR in Batch Report 6T-1611 and the videotape 6T-1611 A & B cases containing the scan for drum DA-4838 that is identified on the videotape as DA-4834.
10	ID	05/23/2000	05/25/2000		Four PRF batches (PRF000006, PRF000007, PRF000008 and PRF000010) were submitted to SPO without having obtained a Field Reference Standard for the new technique (simultaneous sampling) and equipment (tee valve) being used to sample the Field sample and Duplicate (Precision). Requirement Violated: QAPjP for the Transuranic Waste Characterization Program; Tables B1-2, B1-3 and Section B1-1b(3) "Field reference standards are used to assess the accuracy with which the sampling equipment collects VOC samples into SUMMA or equivalent canisters before first use of the sampling equipment". Actions: Actions to be determined.
12688		Molly Anderson			