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

May 30, 2001

ENTERED

Mr. Steve Zappe, Project Leader
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive Bldg. E
Santa Fe, New Mexico 87505

RE: Carlsbad Field Office Monthly Nonconformance Report Summary

Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports for the period of April 24, 2001 through May 24, 2001. The Summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, Section B3-1, subsection titled, *Nonconformance to Data Quality Objectives (DQOs).*

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

Sincerely,

Roger Nelson for Dr. Inés Triay

Dr. Inés R. Triay
Manager

Enclosure

cc: w/o enclosure
J. Bearzi, NMED
J. Kieling, NMED
S. Dinwiddie, NMED

CBFO:QA:SAV:VW:01-1134:UFC:1000

010542

MONTHLY SUMMARIZATION REPORT

FOR

SITE-GENERATED NONCONFORMANCE REPORTS

April 24 – May 24, 2001

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 24, 2001 through May 24, 2001 there were three reportable nonconformance reports generated by the Idaho National Engineering and Environmental Laboratory (INEEL), a TRU waste generator site.

Assigned NCR Number / Site NCR Number	Responsible Organization	Date Notified / By:	Date NCR Received	Date Closed	Deficency
36 / 23526	INEEL / Idaho National Engineering and Environmental Laboratory	04/12/2001 / G. Barnes	04/26/2001	OPEN	In preparation for an upcoming TRU waste shipment (IN010059) from INEEL, it was discovered that one drum (IDRF003201324) for the shipment was not in its expected storage location. In its place was another drum (IDRF003101324) documented as previously having been sent to WIPP (Shipment IN010053). It appears that two containers have been confused for one another, with an incorrect container having been shipped to WIPP. It appears that containers with different shipping categories were inadvertently shipped together.

Requirement Violated:

Certificate of Compliance - 9218
Requirement 1: Section 5.(a).7 "Each payload container must be assigned to a shipping category in accordance with Appendix 1.3.7 of the application, Section 5.1, Payload Shipping Category."
Requirement 2: Section 5.(a)8 "Each payload container must be labeled to indicate its shipping category. Payload containers within a package must be selected in accordance with Appendix 1.3.7 of the application, Section 6.0, Payload Assembly Requirements."

TRAMPAC (subset of C of C)
Shipping Category Designations: Category assigned to Shipment IN010053, payload (b) was 30 0340 0707; used for metals (TRUCON ID225C). Drum IDRF003201324 (graphite, IDC 312) which is suspected of being in Shipment IN010053 has an approved shipping category of 20 0170 0528 (TRUCON ID215A). The RWMC TRAMPAC and Appendix 1.3.7 do not allow the mixing of waste containers from different shipping categories. The shipping category for the payload in Shipment IN010059, where drum IDRF003201324 (graphite) was originally identified to be shipped was 20 0170 0528. This payload was reconfigured once it was identified that drum IDRF003201324 was no longer available.

RWMC TRAMPAC
See above TRAMPAC comment.

RWMC Operations Procedure TPR 1648
Procedure requires the completion of RWMC Form 211 which provides for an independent verification of the payload containers and location within the payload assembly.

WWIS Users Manual
WWIS requires the submittal and approval of all containers shipped and disposed of at WIPP.

Shipping Manifest
The waste container (IDRF003201324) contained two additional hazardous waste codes which were not identified on the Hazardous Waste Manifest.

Actions:

Drum will be rerun through to reverify IDC code. After the drum has been re-RTRd, it will be placed in a hold area with a hold tag placed on drum.

4/26/2001 by Brian W Chesnovar: Requirements changed from: Certificate of Compliance - 9218

Assigned NCR Number / Site NCR Number	Responsible Organization	Date Notified / By:	Date NCR Received	Date Closed	Deficency

Requirement 1: Section 5.(a).7 "Each payload container must be assigned to a shipping category in accordance with Appendix 1.3.7 of the application, Section 5.1, Payload Shipping Category."
Requirement 2: Section 5.(a)8 "Each payload container must be labeled to indicate its shipping category. Payload containers within a package must be selected in accordance with Appendix 1.3.7 of the application, Section 6.0, Payload Assembly Requirements."

TRAMPAC (subset of C of C)
Shipping Category Designations: Category assigned to Shipment IN010053, payload (b) was 30 0340 0707; used for metals (TRUCON ID225C). Drum IDRF003201324 (graphite, IDC 312) which is suspected of being in Shipment IN010053 has an approved shipping category of 20 0170 0528 (TRUCON ID215A).
The RWMC TRAMPAC and Appendix 1.3.7 do not allow the mixing of waste containers from different shipping categories. The shipping category for the payload in Shipment IN010059, where drum IDRF003201324 (graphite) was originally identified to be shipped was 20 0170 0528. This payload was reconfigured once it was identified that drum IDRF003201324 was no longer available.

RWMC TRAMPAC
See above TRAMPAC comment.

RWMC Operations Procedure TPR 1648
Procedure requires the completion of RWMC Form 211 which provides for an independent verification of the payload containers and location within the payload assembly. Personnel error resulted in the shipment of the wrong container.

WWIS Users Manual
WWIS requires the submittal and approval of all containers shipped and disposed of at WIPP. A containers which not approve by WIPP was inadvertently shipped to WIPP for disposal.

Shipping Manifest
The waste container (IDRF003201324) contained two additional hazardous waste codes which were not identified on the Hazardous Waste Manifest.

4/26/2001 by Brian W Chesnovar: Requirements changed from: CAO WAP
4/26/2001 by Brian W Chesnovar: NCR Description changed from: Shipped drum IDRF003201324 in shipment #53 to WIPP instead of drum IDRF003101324.
4/26/01 by Janae Shanahan: Quality Engineer changed from Ken Logue to Brian W Chesnovar
04/12/2001 by Ken Logue for Pound , Donald: Concur with the conditional use request.
04/12/2001 by Ken Logue: Concur with the conditional use request.
4/12/2001 by Richard Barnes: NCR 23526 submitted to Donald G Pound and Ken Logue for conditional use request approval.
4/12/2001 by Richard Barnes: NCR 23526 facility/program/project manager Pound , Donald assigned for conditional use request approval.
4/12/2001 by Richard Barnes: Conditional use request modified.
04/12/2001 by Ken Logue: Submitted to Responsible Manager Barnes , G for completion of disposition and corrective action plan.
4/12/2001 by Gregory J Law: Quality Engineer changed from Gregory J Law to Ken Logue
4/12/2001 by Richard Barnes: Quality Engineer changed from Timothy W Preston to Gregory J Law
4/12/2001 by Richard Barnes: NCR submitted to Quality Engineer Timothy W Preston for completion of screening.

Assigned NCR Number / Site NCR Number	Responsible Organization	Date Notified / By:	Date NCR Received	Date Closed	Deficency
					Comments: None
37 / 23763	INEEL / Idaho National Engineering and Environmental Laboratory	04/25/2001 / Blair	04/26/2001	04/30/2001	ANL Visual Batch #: WCV-010256, Container #: IDRF741202328 The visual inspection information from the Waste Categorization Summary Form for the above batch/drum was not properly entered into TRIPS as viewed in the ANL Visual Batch screen. Specifically, the mass of vermiculite 0.948 Kg) was not included in the TRIPS data. This can be observed as the difference in the total mass found on the Waste Categorization Summary Form 210.248 Kg) and the total mass found in TRIPS (209.300 Kg). **Requirement Violated:** WAP B3-10: requirements for raw data collection and management. See the Quality Assurance Data Review VE container/batch checklist (QADR; question 3. This if found in ANL-W Document: NT-AP-03; TWCP Data Generation- Level Review; Doc No W0102-125-AP-12 of 11/17/00. **Actions:** Have the QADR correct the TRIPS entry to include the vermiculite weight (0.948 kg). **Comments:** None

Assigned NCR Number / Site NCR Number	Responsible Organization	Date Notified / By:	Date NCR Received	Date Closed	Deficency
38	INEEL	05/16/2001	05/22/2001	05/17/2001	For batch PRF010148, page 50, drum #: IDRF741201288; The "Equilibrium Time and Drum Age Criterion Worksheet" was not completed, in that the "Liner Puncture verified by RTR" was not circled Y or N.
23997	Idaho National Engineering and Environmental Laboratory	W. Blair			

Requirement Violated:

1) TPR-1728 rev 34: Step 3.1.3 OF: Ensure only 55-gal drums which are vented using carbon composite filters that meet the following criterion are used for the direct canister sampling batch: A. Drum liners shall be penetrated before manual headspace gas sampling. Verification of puncture must be made by Real-Time Radioscopy (RTR).

Step 4.1.4 OF: Ensure that each container meets the equilibrium time and drum age criteria by completing RWMC Form-194. Include data for each drum in the Batch Data Report folder. TRIPS information is available for determination.

2) PLN-190; B1-1a(3)i: Sampling through the Carbon Composite Filter To ensure the sample collected is representative; all general method requirements; sampling apparatus requirements; and QC requirements described in this section are met in addition to the following requirements pertinent to drum HSGS through the carbon filter: Verification of the liner penetration is made and documented using either RTR video review or confirmation based on the drum venting event. The confirmation of liner penetration is made before a drum is selected for manual gas sampling.

Actions:

Verify by RTR that the liner was punctured prior to gas sampling.
Corrective Actions (CA) Taken: 5/17/2001 by Lyle W Ryman

Actual Actions Taken: The foreman circled "Y" on the RWMC Form 194 (page 000050 of PRF010148) to show that the liner puncture was verified by RTR. The corrective action is complete.
Action Completed on: 05/17/2001

Comments:

None