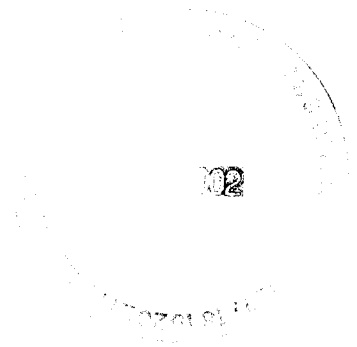




**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
June 27, 2002

ENTERED



Mr. Steve Zappe, Project Leader  
Hazardous Materials Bureau  
New Mexico Environment Department  
2905 E. Rodeo Park Drive, Bldg. 1  
Santa Fe, Nm 87502-6110

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 NCR Summarization Report. The NCR Summary Report is for Site-Generated Nonconformance Reports received at CBFO during the period of May 24, 2002 through June 24, 2002. The Summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, Section titled, *Nonconformance to Data Quality Objectives (DQOs)*.

Please contact Ms. Ava L. Holland, QA Manager, at (505) 234-7423 if you have any questions or concerns.

Sincerely,

Dr. Ines R. Triay  
Manager

Enclosure

cc w/o enclosure:  
J. Kieling, NMED  
J. Bearzi, NMED  
A. Holland, CBFO

020646



S. Zappe

-2-

June 27, 2002

bcc w/enclosure:

L. Chism, CBFO

B. Kehrman, WTS

P. Roush, WTS

bcc w/o enclosure:

J. Plum, CBFO \*ED

L. Steven, WTS \*ED

**MONTHLY SUMMARIZATION REPORT**  
**FOR**  
**SITE-GENERATED NONCONFORMANCE REPORTS**  
**May 24, 2002 – June 24, 2002**

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 May 24, 2002 through June 24, 2002 there were two reportable nonconformance reports (NCRs) generated by the *Idaho National Engineering and Environmental Laboratory (INEEL)* and the *Rocky Flats Environmental and Technology Site (RFETS)*, while characterizing waste at TRU waste generator sites.

List of ALL NCR Between the following Dates

Latest Start Date = 5/24/2002

Earliest End Date = 6/24/2002

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

NCR Number: CBFO Assigned	Responsible Organization	Date Notified	Date NCR Received	Date Closed	Deficiency
------------------------------	-----------------------------	---------------	----------------------	-------------	------------

Site Assigned:	By:
----------------	-----

74	INEEL =	3/5/2002	6/13/2002	OPEN	<p>Nonconformance Description:*</p> <p>Incorrect generation dates for "IDC 807a" &amp; "IDC 807b" waste were documented in TRIPS. The beginning generation date for the solidified by-pass sludge from building 374 (IDC 807a) was identified in the AK document as March 1987. IDC 807 had previously been assigned to cemented incinerator sludge (IDC 807b) through March 1987. No day was specified for either waste stream, and so the start and end dates for the two IDC subsets (807a and 807b) entered into TRIPS was April 1, 1987. (The a and b identifiers are not included in the IDC fields in TRIPS.) The actual end date for 807b was March 20 and the generation start date for 807a was March 18. March 21, 1987 is a more equitable division date of the IDC 807 components of the two waste streams. The two waste streams have different WMCs (S3121 and S3150) which are assigned to the containers in TRIPS according to pack date and IDC.</p> <p>TRIPS currently assigns all IDC 807 drums, regardless of package date, WMC S3121 in the Generator Data screen. IDC 807 drums generated March 20, 1987 or earlier should be assigned WMC S3150. The WMC for the current population of IDC 807b is not accurate to the source document. In addition, TRIPS identifies different WMCs in different screens, i.e., the RTR Edit Event screen lists S3150 and the Generator Data screen lists S3121. The incorrect listing of the WMC in TRIPS may have affected validation of some IDC 807b drums.</p> <p>In addition, some IDC 807b drums have been assigned the incorrect TRUCON and shipping category codes in the Generator Data screen in TRIPS. A date change to the TRIPS shipping category service is needed to correct these codes.</p>
27101	Idaho National Engineering and Environmental Laboratory	Betty Tolman			

**Requirement Violated:**

Requirement(s) Violated:\*

Plan-190, Rev. 11, B1-3, Real Time Radioscopy

RTR is a technique that involves X-ray scanning of waste containers to identify and verify waste container contents. This includes the following activities:

- Verifying Waste Matrix Code (matrix parameter categories)
- Estimating waste material parameter weights
- Verifying the waste stream description
- Verifying absence of prohibited items

Plan-190, Rev. 11, B3-4a, QOAs

The QAOs for RTR are detailed in this section. The objective of RTR for the TWCP is to verify the Waste matrix Code, identify prohibited items (see PLN-579) for each waste container, and estimate each waste material parameter weight. All activities required to achieve these objectives are described or incorporated by reference in this QAPJP and TPR-1572.

TPR-1572, Rev. 46, Operating the Real-Time Radioscopic (RTR) System(s)

<b>NCR Number: CBFO Assigned Site Assigned:</b>	<b>Responsible Organization</b>	<b>Date Notified By:</b>	<b>Date NCR Received</b>	<b>Date Closed</b>	<b>Deficiency</b>
					<p>Appendix C, Guidelines for Completing the RTR TRIPS Questionnaire Note 4, Question 3, Is the IDC Verifiable?            Ensure the Waste Description and the Waste Matrix Code based on EDF-805Ra, Matrix Parameter Category Groups. If the generator content code cannot be verified, the RTR operator may assign a proper IDC to the waste package only if the operator can clearly determine the container contents. Enter a reason why it could not be verified in the "Reason for non-verifiable" field in TRIPS.</p> <p>TPR-1785, TRIPS Reference Data Management            2.0 Scope and Applicability (para. 2)            Reference data update driven by Waste Isolation Pilot Plan (WIPP) source documents, that is, WIPP-Waste Acceptance Criteria (WAC), TRUPACT-II, Waste Analysis Plan (WAP), must be evaluated and reported to appropriate management at the time of data update to determine necessary impacts.            2.1 TRIPS reference data change requirements:            2.1.1 Changes which do not require additional approval:            · Reference data changes that are driven by an approved source document will not be required to go through the TDCR approval process.            - Reference data changes that are driven by an approved procedure update will not require the use of the TDCR system.</p>
					<p><b>Actions:</b></p> <p><b>Comments:</b></p>
75 2002-000734	RFETS = Rocky Flats Environmental Technology Site	6/14/2002 C.A. Turner	6/14/2002	OPEN	<p>Headspace gas analysis results included in the batch data reports identified above were obtained when the initial calibration files used to quantitate headspace gas results exhibited potential inconsistencies in the relative response factors (RRFs) when data were regenerated using different data process routines at different times but with the same calibration files.</p> <p><b>Requirement Violated:</b> WIPP Hazardous Waste Permit Waste Analysis Plan</p> <p><b>Actions:</b> Immediate Actions Taken: Shipments of waste with headspace data affected by this problem were suspended until the data is re-evaluated and, if necessary, reprocessed. Planned shipments CY02-278 and CY02-286 are being held pending resolution of this NCR.</p> <p><b>Comments:</b> NCR originally transmitted to wipp.notify on 6/14/02; however, it was inadvertently removed from wipp.notify and resubmitted on 6/24/02 subsequent to resubmittal request.</p>