



Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
April 25, 2003



Mr. Steve Zappe, Project Leader
Hazardous Materials Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive, Bldg. 1
Santa Fe, NM 87505-6110

RE: Carlsbad Field Office Monthly Nonconformance Summarization Report and
Plan and Procedure Change Report

Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Field Office (CBFO) Monthly NCR Summarization Report. The NCR Summarization Report lists site-generated Nonconformance Reports (NCRs) received at CBFO during the period of March 24, 2003 through April 23, 2003. This summary is transmitted per the requirement contained in the WIPP Hazardous Waste Facility Permit, Section B3-1, *Nonconformance to Data Quality Objectives (DQOs)*.

Also enclosed is the CBFO Plan and Procedure Change Report. The Plan and Procedure Change Report lists document changes that affect performance criteria or data quality and were approved by CBFO during the period of March 1, 2003 through March 31, 2003. This report is transmitted per the requirements contained in the WIPP Hazardous Waste Facility Permit, Section B3-15, *Changes to WAP-Related Plans or Procedures*, and Section B5-2, *Document Review, Approval, and Control*.

If you have any questions or concerns, please contact Ms. Ava L. Holland of CBFO at (505) 234-7423.

Sincerely,

Dr. Inés R. Triay
Manager

Enclosure

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



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
March 24, 2003 – April 23, 2003

This summary is submitted in compliance with the requirements of the WIPP Hazardous Waste Facility Permit, Section B3-1, Nonconformance to Data Quality Objectives (DQOs).

During the period of March 24, 2003 through April 23, 2003 there was one reportable Nonconformance Report (NCR), generated by the *Rocky Flats Environmental Technology Site* (RFETS), while characterizing waste at TRU waste generator sites.

List of ALL NCRs Between the following Dates:

Latest Start Date = 3/24/2003

Earliest End Date = 4/23/2003

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

NCR Number/CRFO Assigned	Responsible Organization	Date Notified	Date NCR Received	Date Closed	Deficiency
100 2003-000443	RF Rocky Flats Environmental Technology Site	4/9/2003 R.A. Eschenbaum for MK	4/9/2003	OPEN	DC2461 was headspace gas sampled on 11/7/02 but DAC was not achieved until 11/15/02. (Data for DC2461 was used as the QC Sample duplicate.) The drum was sampled on 11/7/02 and included in batch data report HGAS-DP-00388. This is a procedure violation (PRO-1351-440-SWB) because it was sampled prior to achieving DAC. PRO-1351-440-SWB In the batch data report, mark the headspace data for DC2461 as useable only for the QC sample duplicate. Remove headspace sample data for DC2461 from WEMS. Change the data package case narrative to reflect the data for the drum is useable only for the QC sample duplicate and reference this NCR. Discussions have been held with headspace personnel regarding the procedure requirements for headspace sampling.
Requirement Violated:					
Actions:					
Comments:			None		

PLAN AND PROCEDURE CHANGE REPORT

March 1, 2003 – March 31, 2003

This report is submitted in compliance with the requirements of the WIPP Hazardous Waste Facility Permit, Section B3-15, Changes to WAP-Related Plans or Procedures, and Section B5-2, Document Review, Approval, and Control.

During the period of March 1, 2003 through March 31, 2003, there were fourteen reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Central Characterization Project (CCP)*, the *Hanford Site*, the *Idaho National Engineering and Environmental Laboratory (INEEL)*, and the *Rocky Flats Environmental Technology Site (RFETS)*. The changes were approved by CBFO during March 2003.

Plan and Procedure Change Report

Start Date: 3/1/2003

End Date: 3/31/2003

CCP

Change Description

Tracking # CBFO Approval Date Document Title

03-1603 3/26/2003 CCP-TP-005, R12, Draft B, CCP Acceptable Knowledge Documentation
 Clarified waste matrix code assignment.

Hanford

Change Description

Tracking # CBFO Approval Date Document Title

03-1341 3/19/2003 LO-090-450, R E-0, TRU Project Sample Chain of Custody, Storage, Acceptance, and Disposal
 Added requirement to maintain documentation of temperature range as a quality record.

03-1397 3/26/2003 WMP-400, Section 7.1.1, R14, TRU Waste Characterization Data Quality Objectives Reconciliation and Reporting
 Added BDRS from VE technique.

03-1392 3/26/2003 WMP-400, Section 7.1.4, R11, Sampling Design and Data Analysis for RCRA Characterization and Visual Examination of TRU Waste
 Removed note excluding solids sampling in preparation for June audit of solids sampling.

Plan and Procedure Change Report

Start Date: 3/1/2003
End Date: 3/31/2003

03-1617	3/27/2003	WMP-400, Section 7.1.6, R11, TRU Waste Project Level Data Validation and Verification	Added text to allow use of other site's WAP-compliant characterization data.
03-1610	3/27/2003	HNF-2599, R8, Hanford Site TRU Waste Characterization Quality Assurance Project Plan (QAPP)	Added: RTR/VE recordings to lifetime recs req'd; reqs. for sampling thru a filter vent hole for POCs; use of other certified site's analysis data.

INEEL

Tracking # CBFO Approval Date Document Title

Tracking #	CBFO Approval Date	Document Title	Change Description
03-1611	3/27/2003	NT-AP-09, R5, TWCP Visual Examination Expert (VEE) Functions and Process	Clarified that the VEE's decision not to open packages is documented on the data form.

RFETS

Tracking # CBFO Approval Date Document Title

Tracking #	CBFO Approval Date	Document Title	Change Description
03-1302	3/3/2003	PRO-940-WIPP-010, R17, WIPP TRU Waste Characterization Project Level Data Review & Reporting	Clarified release of HSG samples by the SPM.

Plan and Procedure Change Report

Start Date: 3/1/2003
End Date: 3/31/2003

ID	Date	Description	Notes
03-1321	3/7/2003	PRO-1265-SS-001, R1, CHG-02, Building 774 and Tank T-207 Aqueous Sludge Removal and Characterization Plan	Clarified selection of drums for sludge sampling.
03-1324	3/7/2003	L-4035-N, ICN-02 Metals Data Verification and Validation, Data Generation Level	Clarified that samples are cooled to 4 degrees C.
03-1322	3/7/2003	L-4039-I, ICN-01, WIPP Data Review and Validation for Semi-Volatile Compounds (SVOCs) in Solid Samples	Added step for verification of successful PDP participation.
03-1323	3/7/2003	L-4038-G, ICN-01, WIPP Data Review and Validation for Volatile Organic Compounds (VOCs)	Added step for verification of successful PDP participation.
03-1312 &	3/7/2003	PRO-1351-440-SWB, R1, DC-02, Room 113 PermaCon Operations	Added steps for verification that containers meet the DAC and date of temperature reading is documented.

Plan and Procedure Change Report

Start Date: 3/1/2003
End Date: 3/31/2003

03-1357	3/18/2003	4-D99-WO-1100, R7, Solid Radioactive Waste Packaging Procedure, New TOC and Parts 1-4	Added steps for packaging TDOPs.
---------	-----------	---	----------------------------------