



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

June 30, 2004

ENTERED



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

**Subject:** 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 Nonconformance Report Summarization Report. The report lists site-generated NCRs received at CBFO during the period of May 24 through June 23, 2004. It is transmitted pursuant to the requirements 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 report lists document changes that affect performance criteria or data quality that were approved by CBFO during the period of May 1 through May 31, 2004. It is transmitted pursuant to 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 at (505) 234-7423.

Sincerely,

R. Paul Detwiler  
 Acting Manager

Enclosure

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



**MONTHLY SUMMARIZATION REPORT**  
**FOR**  
**SITE-GENERATED NONCONFORMANCE REPORTS**

**May 24, 2004 – June 23, 2004**

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 May 24 through June 23, 2004, there were two reportable Nonconformance Reports (NCRs), generated by the *Lawrence Livermore National Laboratory/Central Characterization Project (LLNL/CCP)* and 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 = 5/24/2004

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

Earliest End Date = 6/23/2004

NCR Number: CBFO Assigned	Responsible Organization	Date Identified	Date NCR Received	Date Closed	Deficiency
168	CLL Lawrence Livermore National Laboratory / CCP	6/1/2004 Billy Kirkes	6/1/2004	6/3/2004	During SPM review of Lawrence Livermore BDR# LL04-NDE-0010, it was discovered that drum LL85400574TRU had greater than 50% homogeneous solids with no associated NCR to reject the drum.  <b>Requirement Violated:</b> CCP-TP-102, Rev. 1, section 4.7.8[A] states, "Verify that the physical form of the waste matches the waste stream description, and the waste matrix code." Section 4.7.8[C] further states, "if the waste does not match, then initiate a NCR in accordance with CCP-QP-005."  <b>Actions:</b> The Vendor Project Manager will plan and implement corrective actions.  Disposition: Return this drum to LLNL for disposition. This is a non-remediable condition.  Final Disposition Approval (Responsible Manager and SPQAO/FQAO) signatures on 6/3/04. Final Disposition Complete (Responsible Manager) signature on 6/3/04. Final Disposition Verified (SPQAO/FQAO) signature on 6/3/04.
169	RF Rocky Flats Environmental Technology Site	6/16/2004 R.A. Eschenbaum	6/17/2004	6/16/2004	<b>Comments:</b> None  WIPP Related: Yes Item I.D. # / Description: D77188 was headspaced on 3/12/03 and the results are in HGAS-DP-00500. The headspace data must be voided. Location: 440 Bldg. Nonconformance Description: D77188 was headspaced on 3/12/03 and the results are in batch data report HGAS-DP_00500. This drum was part of the CAP for venting issues and the data was not removed from the batch data report at that time because the drum had gone through gas generation and TRU Programs wanted to retain the gas generation data. The drum was opened on 5/3/04 to confirm the liner had been vented. It had not but a needle hole was found. Due to the uncertainties associated with whether the sampling was adequately performed, the headspace data is being voided. The gas generation testing batch data had been invalidated due to technical issues.  PRO-1351-440-SWB  <b>Requirement Violated:</b> <b>Actions:</b> Immediate Actions Taken: Noted when drum was opened for venting. Validation: Significance Lvl: Minor; Operability Eval Required: No; Generic Implications: No (Responsible Manager Ed McCarthy, Signature date 6/16/04). Final Disposition: Scrap data from HGAS-DP-00500 and in WEMS. The data for this container will still be acceptable for satisfying HGAS quality control requirements if it was used for this purpose. Scrap. Scheduled Completion Date: 6/30/04. Disposition Performance Results: Acceptable. Results Verified By: E.L. D'Amico, Signature date 6/16/04.  Closure Results/Comments/Supporting Information: The headspace data associated with D77188 have been voided in HGAS-DP-00500 and in WEMS (see attached WEMS Samples Form). The PQAO or designee will verify insertion of this NCR in HGAS-DP-00500. This verification will be performed during Project Level Validation law PRO-940-WIPP-010. Final QA Review By: John Tressell, Signature date 6/16/04. Trend Code: WST-COM29.
2004-000434					<b>Comments:</b> None

## **PLAN AND PROCEDURE CHANGE REPORT**

**May 1, 2004 – May 31, 2004**

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 May 1 through May 31, 2004, there were three reportable document changes that affected performance criteria or data quality. These document changes were submitted for CBFO review and approval by the *Hanford Site*, and were approved by CBFO during May 2004.

# Plan and Procedure Change Report

Start Date: 5/1/2004

End Date: 5/31/2004

Hanford

Tracking #	CBFO Approval Date	Document Title	Change Description
04-1438	5/20/2004	ZO-170-057, RB, Change 0, Visual Examination Technique for PFP Debris Waste	Added procedure for VE of PFP debris waste.
04-1439	5/20/2004	FSP-PFP-5-8, Volume 2, R9, Change 0, Data Management	Added the use of new VE procedure, ZO-170-057.
04-1449	5/24/2004	WMP-400, Section 7.1.5, R11, WIPP Waste Information System Data Entry and Reporting	Clarified WWIS data entry responsibilities and independent WCO verification of WWIS data entry.