



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



FEB 14 2012

CERTIFIED MAIL - RETURN RECEIPT

Mr. John Kieling, Acting Bureau Chief
 Hazardous Materials Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505-6303

Subject: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports, January 2012

Dear Mr. Kieling:

Enclosed is the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports (NCRs), transmitted pursuant to the requirements contained in the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3-13, *Nonconformance to DQOs*. The report lists site-generated NCRs received at CBFO during the period of January 1-31, 2012.

An electronic version of this documentation is provided as a courtesy for use by the New Mexico Environment Department, but is not to be regarded as the formal submittal.

I certify under penalty of law that this document and all enclosures 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 fines and imprisonment for knowing violations.

If you have any questions or concerns, please contact Mr. Randy Unger, Office of Quality Assurance Director, at (575) 234-7065.

Sincerely,

Jose R. Franco
 Manager

Enclosure

cc: w/enclosure

S. Holmes, NMED * ED
 T. Hall, NMED ED
 T. Kliphuis, NMED ED
 R. Maestas, NMED ED
 E. Ziemianski, CBFO ED

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 WIPP Operating Record ED
 CBFO QA File
 CBFO M&RC
 *ED denotes electronic distributi



MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
January 2012

This summary is submitted pursuant to the requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3, Paragraph C3-13, Nonconformance to DQOs.

During the period of January 1 through January 31, 2012, the Carlsbad Field Office received seven reportable nonconformance reports, generated by the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP), Los Alamos National Laboratory/Central Characterization Project (CCP), and the Savannah River Site/Central Characterization Project (CCP).

List of ALL Reportable NCRs Between the following Dates:

Latest Start Date = 1/1/2012

Earliest End Date = 1/31/2012

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

<u>NCR Number: CBFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
404 NCR-SRS- 0103-12, Rev. 0	CS Savannah River Site / CCP	1/10/2012 Carolina Soatema	1/12/2012	OPEN	<p>Process: NDE Batch Data Report #(s): SR4RTR0223 Container #(s): SWD071155</p> <p>Waste does not match the waste stream description. Drum contains batteries.</p> <p>Requirement Violated: Section C-3c of CCP-PO-001, Rev. 20, states in part, "if radiography and/or VE indicate that the waste does not match the waste stream description produced by AK characterization, a non-conformance report (NCR) is completed and the inconsistency is resolved as specified in section C4 (Q5)."</p> <p>CCP-TP-053, Rev. 11, Section 4.4.2 [H.2], "if the waste form DOES NOT match the Waste Stream Description and/or the Waste Matrix Code. THEN initiate an NCR in accordance with CCP-QP-005, AND record NCR number in Section 1 of Attachment 2 and a description in the Comments block.</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Responsible Manager send this NCR to the AK Expert for re-evaluation in accordance with CP-TP-005. 2. AK Expert perform the AK re-evaluation and include a copy of documented results as an attachment to this NCR. 3. SPM determine Final Disposition (block 19) based on the results of the AK Expert for re-evaluation. <p>Comments: None</p>
405 NCR-LANL- 0083-12, Rev. 0	CL Los Alamos National Laboratory / CCP	1/12/2012 Richard Kantrowitz	1/13/2012	OPEN	<p>Process: NDE Batch Data Report #(s): LA-RTR2-10-0024 Container #(s): 64208</p> <p>This drum is assigned to Waste Stream LA-MIN04-S.001, which is predominately pyrochemical salt. RTR examination of this drum revealed the waste is ash. This does not match the Waste Stream description.</p> <p>This drum is assigned to Waste Stream LA-MIN04-S.001, which is predominately pyrochemical salt. RTR examination of this drum revealed the waste is ash. This does not match the Waste Stream description.</p> <p>Requirement Violated: CCP-TP-053, Revision 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.4.2 [H.2] states "IF the waste form DOES NOT match the Waste Stream description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-QP-005."</p> <p>Actions:</p> <ol style="list-style-type: none"> 1. Responsible Manager to send this NCR to the AKE for re-evaluation in accordance with CCP-TP-005. 2. AKE perform the AK re-evaluation and include documented results as an attachment to this NCR. 3. Responsible Manager to determine Final Disposition based on AKE re-evaluation. <p>Comments: None</p>
406 NCR-SRS- 0105-12, Rev. 1	CS Savannah River Site / CCP	1/17/2012 Carolina Soatema	1/17/2012	OPEN	<p>Process: NDE Batch Data Report #(s): SRSRTR0540 SRSRTR0541</p> <p>Attachment 3 - CCP Radiography Independent Technical Reviewer Checklist, Question 14, answered incorrectly.</p>

<u>NCR Number- CBFO Assigned</u>	<u>Responsible Organization</u>	<u>Date Identified</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
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Site Assigned

By:

Revision 1: Added BDR SRSRTR0541 to NCR.

Requirement Violated: CCP-TP-053, Rev. 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.10.2. "Review BDR to the criteria in the checklist of Attachment 3, AND document the results."

Actions:

1. ITR to make corrections to Attachment 3.
2. Submit changes to Records
3. SPM to re-review BDR.

Comments: None

407	CS	1/17/2012	1/17/2012	OPEN	Process: NDE Batch Data Report #(s): SRSRTR0540 Container #(s): SR501615A SR510438A
<u>NCR-SRS- 0109-12, Rev. 0</u>	<u>Savannah River Site / CCP</u>	<u>Carolina Soatema</u>			

The containers do not match the Waste Stream Description, due to the Waste Packaging (no liner).

Requirement Violated: CCP-PO-001, Revision 20, Section C-3c, "If radiography and/or VE indicate that the waste does not match the waste stream Description produced by AK characterization, a nonconformance report (NCR) is completed and the inconsistency resolved As specified in Section C4 (Q5)"

CCP-TP-053, Rev. 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.4.2 [H2], "If the waste form DOES NOT Match the Waste Stream Description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-QP-005, and record in Section 1 of Attachment 2 and a description in the Comments block."

Actions:

1. Responsible Manager send this NCR to the AK expert for re-evaluation in accordance with CCP-TP-005.
2. AK Expert perform AK re-evaluation and include a copy of documented results as an attachment to this NCR.
3. SPM determine Final Disposition (block 19) based on the results of the AK Expert for re-evaluation.

Comments: None

408	CS	1/24/2012	1/25/2012	OPEN	Process: NDE Batch Data Report #(s): SRSRTR0542 Container #(s): SR513044
<u>NCR-SRS- 0109-12</u>	<u>Savannah River Site / CCP</u>	<u>Carolina Soatema</u>			

The containers do not match the waste stream description due to waste packaging (no liner).

Requirement Violated: CCP-PO-001, Revision 20, Section C-3c "If radiography and/or VE indicate that the waste does not match the waste stream description produced by AK characterization, a nonconformance report (NCR) is completed and the inconsistency resolved as specified in Section C4 (Q5)"

CCP-TP-053, Revision 11, Section 4.4.2 [H.2] "If the waste form DOES NOT match the Waste Stream Description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-QP-005, and record NCR number in Section 1 of Attachment 2 and a description in the Comments block."

Actions:

1. Responsible Manager send this NCR to the AK expert for re-evaluation in accordance with CCP-TP-005.
2. AK Expert perform the AK re-evaluation and include a copy of documented results as an attachment to this NCR.
3. SPM determine Final Disposition (block 19) based on the results of the AK Expert for re-evaluation.

Comments: None

<u>NCR Number:</u> <u>CBFO Assigned</u> <u>Site Assessment</u>	<u>Responsible Organization</u>	<u>Date Identified</u> <u>By:</u>	<u>Date NCR Received</u>	<u>Date Closed</u>	<u>Deficiency</u>
409 NCR-SRS-0110-12, Rev. 1	CS Savannah River Site / CCP	1/25/2012 Adela Cantu	1/26/2012	OPEN	<p>Process: HSG Batch Data Report #(s): SRHSG1202 Container #(s): SR46003R</p> <p>Operator selected the incorrect sampling scenario for container SR46003R on Attachment 2. Sample Container Data Form Revision 1: Revised to clarify the wrong Sampling Scenario was listed on Attachment 2.</p> <p>Requirement Violated: CCP-TP-093, Revision 16, CCP Sampling of TRU Waste Containers 4.3.1 For all the containers to be sampled, verify the DAC prior to Sampling by using Tables 1-5, as appropriate AND perform the following: {A.16} Permit Required Equilibrium Time (Days): (a) For Scenario 1 – Record the Summary Category Group (SCG) DAC from Table 2. (b) For Scenario 2 – In addition to meeting the Scenario 1 SCG DAC from Table 2, record the number of days listed in Table 3 for SCG, hole diameter and diffusivity rate. (c) For Scenario 3 – Record the number of days for the SCG listed in Table 5 for the Packaging Configuration Group, hole diameter and filter diffusivity.</p> <p>Actions: 1. DGL to correct sampling scenario for SR46003R and re-sign. 2. ITR to review corrections and re-sign checklist. 3. Submit corrections and copy of this NCR to records 4. SPM to insert the corrections and NCR into BDR and complete SPM review.</p> <p>Comments: None</p>
410 68577	IA INL Advanced Mixed Waste Treatment Project (formerly INEEL)	1/26/2012 George Byram	1/26/2012	OPEN	<p>Title: NCR not initiated for prohibited condition as required Affected Item Type: Container ID Source Type: As Found Condition Batch No. RTR11-00163 Container ID: 10178119</p> <p>During RTR of container 10178119, the waste was determined to contain impenetrable dense objects and the batch (RTR11-00163) marked accordingly; however an NCR was not generated as required per INST-OI-12, Section 4.7.37.1.</p> <p>Requirement Violated: INST-OI-12, 4.7.37.1</p> <p>Actions: Upon notification by SPM, Type-3 NCR 68392 was generated by ITR for this nonconforming condition. GTB 1/26/2012</p> <p>Comments: None</p>

Number of items on this report: 7