



U.S. DEPARTMENT OF **ENERGY**

ESHID-603672

National Nuclear Security Administration

Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, New Mexico 87544
(505) 667-5105/Fax (505) 667-5948

Environmental Management

Los Alamos Field Office
1200 Trinity Drive, Suite 400P
Los Alamos, New Mexico 87544
(240) 562-1122

Date: December 20, 2021

Mr. Rick Shean, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Fiscal Year 2021 Nonconformance Report, Los Alamos National Laboratory, EPA ID #NM0890010515

Dear Mr. Shean:

The United States Department of Energy (DOE) and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Environmental Management Los Alamos Field Office (EM-LA), together with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, submit the report, *Fiscal Year 2021 Nonconformance Report (NCR)* to the New Mexico Hazardous Waste Bureau (NMED-HWB). The submittal is in response to the NMED-HWB's July 9, 2020 correspondence requiring Los Alamos National Laboratory (LANL) to provide an annual report to "keep NMED apprised of the status of containers which do not meet the DOE Carlsbad Field Office Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria (WAC) due to the potential presence of incompatible wastes (i.e., nitric acids (D002) and organics) and which may require remediation, or are determined to have [an] D001 or D003 waste by the receiving facility." Per procedure *LANL P330-6 Rev. 18 Nonconformance Control and Reporting*, a "nonconformance" is defined as a deficiency in a characteristic, documentation, or procedure that renders the quality of an item or activity unacceptable or indeterminate. For clarification and perspective, a nonconformance designation does not equate to a LANL Hazardous Waste Facility Permit noncompliance. Rather, a nonconformance is only identified when a container destined for shipment to WIPP requires further evaluation including additional acceptable knowledge evaluation information or remediation in order to meet the stringent requirements of the WIPP WAC.

Enclosures 1 and 2 list, in table format, the containers for each respective Permittee that were identified to initially meet the criteria for the requested NCR reporting. The information presented in these enclosures satisfy the reporting requirements as discussed and approved by the NMED-HWB during the September 10, 2020, joint LANL/NMED teleconference call.

If you have questions or comments concerning this submittal for Triad, please contact Karen E. Armijo (NA-LA) at (505) 665-7314 or Patrick L. Padilla (Triad) at (505) 412-0462.

If you have questions or comments concerning this submittal for N3B, please contact Arturo Duran (EM-LA) at (575) 373-5966 or Emily Day (N3B) at (505) 695-4243.

Sincerely,

Karen E. Armijo Digitally signed by Karen E. Armijo
Date: 2021.12.17 10:54:24 -07'00'
Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

Sincerely,

 Digitally signed by BRIAN HARCEK
Date: 2021.12.20 10:43:53 -07'00' For
M. Lee Bishop, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office
U.S. Department of Energy

KEA:JEP:jlh

- Enclosures: 1) Fiscal Year 2021 Annual Nonconformance Report U.S. Department of Energy, National Nuclear Security Administration Los Alamos Field Office and Triad National Security, LLC
- 2) Fiscal Year 2021 Annual Nonconformance Report U.S. Department of Energy, Environmental Management Los Alamos Field Office and Newport News Nuclear BWXT-Los Alamos, LLC

cc w/enclosures:

- Laurie King, USEPA/Region 6, Dallas, TX, king.laurie@epa.gov
- Rick Shean, NMED-HWB, Santa Fe, NM, rick.shean@state.nm.us
- Neelam Dhawan, NMED-HWB, Santa Fe, NM neelam.dhawan@state.nm.us
- Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@state.nm.us
- Mitchell Schatz, NMED-HWB, Santa Fe, NM, mitchell.schatz@state.nm.us
- Theodore A. Wyka, NA-LA, theodore.wyka@nnsa.doe.gov
- Stephen Hoffman, NA-LA, stephen.hoffman@nnsa.doe.gov
- Erika Baeza-Wisdom, NA-LA, erika.wisdom@nnsa.doe.gov
- Darlene Rodriguez, NA-LA, darlene.rodriguez@nnsa.doe.gov
- Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
- Marcus Pinzel, NA-LA, marcus.pinzel@nnsa.doe.gov
- Michael Mikolanis, EM-LA, michael.mikolanis@em.doe.gov
- M. Lee Bishop, EM-LA, lee.bishop@em.doe.gov
- John Evans, EM-LA, john.h.evans@em.doe.gov
- David Nickless, EM-LA, david.nickless@em.doe.gov
- Cheryl Rodriguez, EM-LA, cheryl.rodriguez@em.doe.gov
- Arturo Duran, EM-LA, arturo.duran@em.doe.gov
- Jesse Kahler, EM-LA, jesse.kahler@em.doe.gov
- Elizabeth Churchill, EM-LA, elizabeth.churchill@em.doe.gov
- Michael W. Hazen, Triad, ALDESHQSS, mhazen@lanl.gov
- William R. Mairson, Triad, ALDESHQSS, wrmairson@lanl.gov
- Jeannette T. Hyatt, Triad, EWP, jhyatt@lanl.gov
- Cristina A. Mulcahy, Triad, GC-ESH, mulcahy@lanl.gov
- Jennifer E. Payne, Triad, EPC-DO, jpayne@lanl.gov
- Kristen A. Honig, Triad, EPC-DO, khonig@lanl.gov
- Andie McLaughlin-Kysar, Triad, EPC-DO, andiek@lanl.gov

Jessica L. Moseley, Triad, EPC-WMP, jmoseley@lanl.gov
Cecilia M. Trujillo, Triad, EPC-WMP, ceciliat@lanl.gov
Patrick L. Padilla, Triad, EPC-WMP, plpadilla@lanl.gov
Catherine Juarez, Triad, EPC-WMP, cjuarez@lanl.gov
Oral S. Saulters, Triad, EPC-WMP, osaulters@lanl.gov
Kristen Van Horn, Triad, EPC-WMP, klv@lanl.gov
Adam Olsen, Triad, NPI-6, adam.olsen@lanl.gov
Kim Lebak, N3B, kim.lebak@em-la.doe.gov
Joseph Legare, N3B, joseph.legare@em-la.doe.gov
Jeff Holland, N3B, jeff.holland@em-la.doe.gov
Dana Lindsay, N3B, dana.lindsay@em-la.doe.gov
Ellen Gammon, N3B, ellen.gammon@em-la.doe.gov
Pamela Maestas, N3B, pamela.maestas@em-la.doe.gov
Emily Day, N3B, emily.day@em-la.doe.gov
Jennifer Von Rohr, N3B, jennifer.vonrohr@em-la.doe.gov
William Alexander, N3B, william.alexander@em-la.doe.gov
rcra-prr@lanl.gov
adesh-records@lanl.gov
locatsteam@lanl.gov
epccorrespondence@lan.gov
EMLA.docs@em.doe.gov
n3brecords@em-la.doe.gov
interface@lanl.gov
N3Binterface@em-la.doe.gov



U.S. DEPARTMENT OF
ENERGY

COPY



National Nuclear Security Administration

Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, New Mexico 87544
(505) 667-5105/Fax (505) 667-5948

Environmental Management

Los Alamos Field Office
1200 Trinity Drive, Suite 400P
Los Alamos, New Mexico 87544
(240) 562-1122

Date: December 20, 2021

Mr. Rick Shean, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Fiscal Year 2021 Nonconformance Report, Los Alamos National Laboratory, EPA ID #NM0890010515

Dear Mr. Shean:

The United States Department of Energy (DOE) and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Environmental Management Los Alamos Field Office (EM-LA), together with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, submit the report, *Fiscal Year 2021 Nonconformance Report (NCR)* to the New Mexico Hazardous Waste Bureau (NMED-HWB). The submittal is in response to the NMED-HWB's July 9, 2020 correspondence requiring Los Alamos National Laboratory (LANL) to provide an annual report to "keep NMED apprised of the status of containers which do not meet the DOE Carlsbad Field Office Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria (WAC) due to the potential presence of incompatible wastes (i.e., nitric acids (D002) and organics) and which may require remediation, or are determined to have [an] D001 or D003 waste by the receiving facility." Per procedure *LANL P330-6 Rev. 18 Nonconformance Control and Reporting*, a "nonconformance" is defined as a deficiency in a characteristic, documentation, or procedure that renders the quality of an item or activity unacceptable or indeterminate. For clarification and perspective, a nonconformance designation does not equate to a LANL Hazardous Waste Facility Permit noncompliance. Rather, a nonconformance is only identified when a container destined for shipment to WIPP requires further evaluation including additional acceptable knowledge evaluation information or remediation in order to meet the stringent requirements of the WIPP WAC.

Enclosures 1 and 2 list, in table format, the containers for each respective Permittee that were identified to initially meet the criteria for the requested NCR reporting. The information presented in these enclosures satisfy the reporting requirements as discussed and approved by the NMED-HWB during the September 10, 2020, joint LANL/NMED teleconference call.

ENCLOSURE 1

Fiscal Year 2021 Annual Nonconformance Report
U.S. Department of Energy,
National Nuclear Security Administration
Los Alamos Field Office and Triad National Security, LLC

EPC-DO: 21-372

LA-UR-21-31800

Date: DEC 20 2021

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
LA00000067822	NCR-LANL046120	Oxidizing chemicals that are the sole component of waste Basis of Knowledge (BoK) 24 Addendum 2 Section 4.8.	LA00000067822 4/10/2015	TA-55	D005-D011 5/9/2013	The Acceptable Knowledge Evaluation (AKE) demonstrated waste contains residual dried nitric acid. The container is currently waiting for the Central Characterization Project (CCP) re-evaluation and closure of the NCR.	Open
LA00000068155	NCR-LANL045719	This container contains nitric acid neutralized with sodium hydroxide to a pH of 7. The waste was then absorbed with 3 cups of Waste Lock 770. Less than 1 liter of the mixture was absorbed on to Waste Lock 770 and gray polypropylene pig wipes.	62450 3/7/2014	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 3/25/2014	The container was shipped and received at WIPP on October 15, 2020.	Closed
LA00000068163	NCR LANL045219	This container includes a repackaged fiberglass re-enforced plywood box and plastic. An unknown amount of liquid waste was potentially absorbed either on an engineered organic polymer absorbent or with an inorganic absorbent. Per the BoK process, it is assumed that Waste Lock 770 was used as the absorbent. It is not possible to do a defensible mass balance for this container. Conservative measures require the container to be returned to the host site for additional information.	57457 3/7/2014	TA-03-0029 (CMR)	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 3/25/2014	The container has passed the BoK and the NCR has been closed.	Closed
LA00000069506	NCR LANL045219	Lead-lined gloves, plastic vials, wood, plastic, cheesecloth, and 3 oz. of containerized absorbed liquid. The BoK process conservatively assumes that all liquid is nitric acid. In addition, the BoK process assumes that polyol organic kitty litter (10 kg) was utilized to absorb the 3 oz. of liquid.	53700 02/27/2014	TA-03-0029 (CMR)	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 11/01/2017	The AKE information was provided to CCP for BoK re-certification on the next LA-MHD03.001 evaluation.	Open
LA00000073621	NCR-LANL0472200	The container has trace sulfamic acid that is not currently covered by the current CCE 18 LA-MHD01.001 revision 2.	09/05/2019 LA00000073621	TA-55	D005-D011 9/5/2019	The CCP has evaluated sulfamic acid and will be adding it to the newest revision of the Chemical Compatibility Evaluation (CCE). The CCE revision (CCE19) is still in the final review stage. When the CCE is revision is complete, the NCR will be closed, and the container can proceed through the certification process.	Open

TRU only

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
93960	NCR-LANL0292210	This container failed the BoK for the possible use of vermiculite to absorb free liquids. The BoK does not allow the use of vermiculite (inorganic absorbent) for treating oxidizing chemicals. Per the BoK, the host site is to provide additional information on the type of absorbent or treat the waste to remove the inorganic absorbent.	56896 06/01/1998; 93960 7/03/2013	TA-55 PF4	D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005 Date codes assigned 08/23/2013	Remediation efforts are being planned for this container.	Open
93960	NCR-LANL0283210	This container failed BoK because of the possible use of vermiculite (inorganic absorbent) to absorb free liquids. The BOK does not allow the use of vermiculite for treating oxidizing chemicals. Per the BoK, the host site is to provide additional information on the type of absorbent or treat the waste to remove the inorganic absorbent.	56896 06/01/1998; 93960 7/03/2013	TA-55 PF4	D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005 Date codes assigned 08/23/2013	Remediation have been completed for this container.	Closed
62024	NCR-LANL0314210	This container failed the BoK for the possible use of vermiculite to absorb free liquids. The BoK does not allow the use of vermiculite (inorganic absorbent) for treating oxidizing chemicals. Per the BoK, the host site is to provide additional information on the type of absorbent or treat the waste to remove the inorganic absorbent.	62024 4/12/2007	TA-03-0029 (CMR)	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 12/06/2005	Remediation efforts are being planned for this container	Open
LA00000073668	NCR-LANL-0285211	The CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1 Pyrophoric Materials Section 3.5.1 [A.1] "Non-radionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 MAY contain potentially pyrophoric titanium material.	LA00000073668 1/29/2020	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 2/19/2020	This container has High Efficiency Particulate Air (HEPA) filters that may have originated from a process that produces titanium metal fume particulates in an inert environment. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream.	Open

TRU only

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
LA00000067822	NCR-LANL046120	Oxidizing chemicals that are the sole component of waste Basis of Knowledge (BoK) 24 Addendum 2 Section 4.8.	LA00000067822 4/10/2015	TA-55	D005-D011 5/9/2013	The Acceptable Knowledge Evaluation (AKE) demonstrated waste contains residual dried nitric acid. The container is currently waiting for the Central Characterization Project (CCP) re-evaluation and closure of the NCR.	Open
LA00000068155	NCR-LANL045719	This container contains nitric acid neutralized with sodium hydroxide to a pH of 7. The waste was then absorbed with 3 cups of Waste Lock 770. Less than 1 liter of the mixture was absorbed on to Waste Lock 770 and gray polypropylene pig wipes.	62450 3/7/2014	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 3/25/2014	The container was shipped and received at WIPP on October 15, 2020.	Closed
LA00000068163	NCR LANL045219	This container includes a repackaged fiberglass re-enforced plywood box and plastic. An unknown amount of liquid waste was potentially absorbed either on an engineered organic polymer absorbent or with an inorganic absorbent. Per the BoK process, it is assumed that Waste Lock 770 was used as the absorbent. It is not possible to do a defensible mass balance for this container. Conservative measures require the container to be returned to the host site for additional information.	57457 3/7/2014	TA-03-0029 (CMR)	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 3/25/2014	The container has passed the BoK and the NCR has been closed.	Closed
LA00000069506	NCR LANL045219	Lead-lined gloves, plastic vials, wood, plastic, cheesecloth, and 3 oz. of containerized absorbed liquid. The BoK process conservatively assumes that all liquid is nitric acid. In addition, the BoK process assumes that polyol organic kitty litter (10 kg) was utilized to absorb the 3 oz. of liquid.	53700 02/27/2014	TA-03-0029 (CMR)	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 11/01/2017	The AKE information was provided to CCP for BoK re-certification on the next LA-MHD03.001 evaluation.	Open
LA00000073621	NCR-LANL0472200	The container has trace sulfamic acid that is not currently covered by the current CCE 18 LA-MHD01.001 revision 2.	09/05/2019 LA00000073621	TA-55	D005-D011 9/5/2019	The CCP has evaluated sulfamic acid and will be adding it to the newest revision of the Chemical Compatibility Evaluation (CCE). The CCE revision (CCE19) is still in the final review stage. When the CCE is revision is complete, the NCR will be closed, and the container can proceed through the certification process.	Open

TRU only

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
93960	NCR-LANL0292210	This container failed the BoK for the possible use of vermiculite to absorb free liquids. The BoK does not allow the use of vermiculite (inorganic absorbent) for treating oxidizing chemicals. Per the BoK, the host site is to provide additional information on the type of absorbent or treat the waste to remove the inorganic absorbent.	56896 06/01/1998; 93960 7/03/2013	TA-55 PF4	D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005 Date codes assigned 08/23/2013	Remediation efforts are being planned for this container.	Open
93960	NCR-LANL0283210	This container failed BoK because of the possible use of vermiculite (inorganic absorbent) to absorb free liquids. The BOK does not allow the use of vermiculite for treating oxidizing chemicals. Per the BoK, the host site is to provide additional information on the type of absorbent or treat the waste to remove the inorganic absorbent.	56896 06/01/1998; 93960 7/03/2013	TA-55 PF4	D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005 Date codes assigned 08/23/2013	Remediation have been completed for this container.	Closed
62024	NCR-LANL0314210	This container failed the BoK for the possible use of vermiculite to absorb free liquids. The BoK does not allow the use of vermiculite (inorganic absorbent) for treating oxidizing chemicals. Per the BoK, the host site is to provide additional information on the type of absorbent or treat the waste to remove the inorganic absorbent.	62024 4/12/2007	TA-03-0029 (CMR)	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 12/06/2005	Remediation efforts are being planned for this container	Open
LA00000073668	NCR-LANL-0285211	The CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1 Pyrophoric Materials Section 3.5.1 [A.1] "Non-radionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 MAY contain potentially pyrophoric titanium material.	LA00000073668 1/29/2020	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 2/19/2020	This container has High Efficiency Particulate Air (HEPA) filters that may have originated from a process that produces titanium metal fume particulates in an inert environment. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream.	Open

TRU only

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
LA00000074392	NCR-LANL-0285211	The CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Non-radionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000074392 10/10/2020	TA-55	D005-D011 Date Codes Assigned 3/16/2021	This container has High Efficiency Particulate Air (HEPA) filters that may have originated from a process that produces titanium metal fume particulates in an inert environment. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream.	Open
LA00000074720	NCR-LANL-0285211	The CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Non-radionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000074720 2/22/2021	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 3/16/2021	This container has High Efficiency Particulate Air (HEPA) filters that may have originated from a process that produces titanium metal fume particulates in an inert environment. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream.	Open
LA00000074722	NCR-LANL-0285211	The CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Non-radionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000074722 10/10/2020	TA-55	D005-D011 Date Codes Assigned 3/25/2021	This container has High Efficiency Particulate Air (HEPA) filters that may have originated from a process that produces titanium metal fume particulates in an inert environment. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream.	Open

TRU only

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
LA00000073611	NCR-LANL-0289212	The CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Non-radionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000073611 9/17/2019	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 5/04/2020	This container has debris material from a process that utilizes inert environments. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code.	Open
LA00000074866	NCR-LANL-0377210	The Host Site Personnel were loading a bagged-out bag into an output container (out of line) and lost a flashlight from their lanyard during the evolution that is thought to have possibly fallen into one of the waste containers.	LA00000074866 6/7/2021	TA-55	TRU only	The container was opened, and the flashlight was removed. This NCR will be closed.	Open
LA00000074868	NCR-LANL-0377210	The Host Site Personnel were loading a bagged-out waste bag into an output waste container (out of line) and lost a flashlight from their lanyard during the evolution that is thought to have possibly fallen into one of the waste containers.	LA00000074868 6/7/2021	TA-55	D005-D011 12/01/2021	The container was opened, and the flashlight was removed. This NCR will be closed.	Open
LA00000074382	NCR-LANL-0289212	CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Nonradionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000074382 2/21/2020	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 9/14/2020	This container has debris material from a process that utilizes inert environments. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code.	Open

TRU only

Annual Nonconformance Report
Triad/NA-LA
FY 2021

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
LA00000073442	NCR-LANL-0289212	CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Nonradionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000073442 12/12/2018	TA-55	D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005 Date Codes Assigned 1/15/2019	This container has debris material from a process that utilizes inert environments. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code.	Open
LA00000073650	NCR-LANL-0289212	CCP-PO-002, Revision 31 CCP Transuranic Waste Certification Plan Section 3.5.1, Pyrophoric Materials Section 3.5.1 [A.1] "Nonradionuclide pyrophoric materials are not acceptable at the WIPP." Containers identified in Block 3 may contain potentially pyrophoric titanium material.	LA00000073650 3/17/2020	TA-55	TRU only	This container has debris material from a process that utilizes inert environments. The CCP has placed a NCR on this container as a precaution to ensure that non-oxidized metal particulates do not enter the waste stream. Calculations based upon characterization review have shown that these containers do not warrant a D001 or D003 waste code.	Open

TRU only

ENCLOSURE 2

Fiscal Year 2021 Annual Nonconformance Report
U.S. Department of Energy, Environmental Management
Los Alamos Field Office and Newport News Nuclear BWXT-Los
Alamos, LLC

Date: DEC 29 2021

Annual NCR Report
FY 2021 N3B/EM-LA

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
93960	NCR-LANL0292210	This container failed BOK for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	06/01/1998, 7/03/2013	TA-55 PF4, TA-50	Date codes assigned 08/23/2013. D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
69049	NCR-LANL0296210	This container failed BOK for the potential for Polyol organic sorbents used for absorbing free liquids. Per the BOK process, it is assumed to be organic kitty litter due to time of generation.	09/09/1981, S816609; 12/19/2013 68834	TA-50	Date codes assigned 12/6/2013. D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005	This container has the potential to contain liquids sorbed with organic kitty litter, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
62024	NCR-LANL0314210	This container failed BOK for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	4/12/2007	TA-03-0029 (CMR)	Date Codes Assigned 12/06/2005 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
53629	NCR-LANL0327210	This container failed BOK for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	10/12/1988	TA-50	Container 53629- D008; 53629 Overpacked into LASB02227 (2/26/14) and carries codes fo D001-D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, F003, F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
86432	NCR-LANL0329210	This container failed BOK for the potential for Polyol organic sorbents used for absorbing free liquids. Per the BoK process, is assumed that Waste Lock 770 was used as the sorbent. It is not possible to do a defensible mass balance for this container and is conservatively returned back to host site.	03/02/1983 S832395	TA-50	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
83187	NCR-LANL0329210	This container failed BOK for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	05/16/1982 S821867	TA-50	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
69349	NCR-LANL0341210	This container failed BOK for the potential to include leached solids rinsed with nitric acid.	09/18/1980 S803060	TA-55 PF4	Date Codes Assigned 02/03/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
94064	NCR-LANL0341210	This container failed BOK for the potential to include leached solids rinsed with nitric acid.	04/13/1983 S832554	TA-55 PF4	Container 94064- D008; 94064 Overpacked into LASB02201 (2/11/14) and carries codes fo D004-D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, F003, F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
69065	NCR-LANL0342210	This container failed BOK for the potential for Polyol organic sorbents used for absorbing free liquids. Per the BoK process, is assumed that Waste Lock 770 was used as the sorbent. It is not possible to do a defensible mass balance for this container and is conservatively returned back to host site. Per the BOK process, it is assumed to be organic kitty litter due to time of generation.	09/02/1982 S824413	TA-55 PF4	Date Codes Assigned 12/20/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
68273	NCR-LANL0343210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	10/19/1984, 50003	TA-50	Date Codes Assigned 02/07/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open

Annual NCR Report
FY 2021 N3B/EM-LA

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
68278	NCR-LANL0343210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	10/19/1984, 50003	TA-50	Date Codes Assigned 02/08/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
69206	NCR-LANL0694200	This container failed BOK for the potential for Polyol organic sorbents used for absorbing free liquids. Per the BOK process, it is assumed to be organic kitty litter due to time of generation.	06/19/1980 S802909, 68825	TA-55 PF4	Date Codes Assigned 01/14/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with organic kitty litter, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
93960	NCR-LANL0283210	This container failed BOK for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	06/01/1998, 7/03/2013	56896; TA-55 PF4, TA-50	Date codes assigned 08/23/2013. D004-D011; D018; D019; D021; D022; D035; D038; D039; D040; F001; F002; F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Closed
68704	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	11/3/1981	TA-50-1	Date Codes Assigned 02/12/2018. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68705	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	9/8/1981	TA-50-1	Date Codes Assigned 02/12/2018. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68709	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	5/15/1980	TA-50-1	Date Codes Assigned 11/7/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68769	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	8/3/1981	TA-50-1	Date Codes Assigned 11/7/17. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68770	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	10/4/1982	TA-50-1	Date Codes Assigned 1/23/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68774	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	11/7/1983	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68778	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/8/1982	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68795	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/4/1980	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed

Annual NCR Report
FY 2021 N3B/EM-LA

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	Path Forward for Remediation of Container	Resolved or Current Status
68859	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/8/1982 S822080	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68915	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	12/2/1980	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68916	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	12/2/1980	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68918	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	3/9/1982	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68919	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	3/1/1983	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68921	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	7/13/1983	TA-50-1	Date Codes Assigned 2/12/18 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68922	NCR-LANL0309210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	3/9/1982	TA-50-1	Date Codes Assigned 2/12/18 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MIN03-NC.001 and passed.	Closed
68163	NCR-LANL0320210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	06/26/2013 745634	TA-03-0029 (CMR)	Date Codes Assigned 09/15/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MHD03.001 and passed.	Closed
85072	NCR-LANL0320210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	12/1/1979 S792740, 02/12/2014 LASB02210	TA-03-0029 (CMR)	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MHD03.001 and passed.	Closed
69524	NCR-LANL0336210	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/9/1981	TA-55-PF4 TA-50-0069 (WCCRF)	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK exempt for LA-MHD01.001 and passed.	Closed
56895	NCR-LANL0479200	This container failed BOK for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	6/10/1998	TA-55 PF4	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Closed