

HASQARD Focus Group
Meeting Minutes
July 20, 2010

The meeting was called to order by Dave Crawford, Focus Group Chairman, at 2:05 PM on July 20, 2010 in Conference Room 208 at 2425 Stevens.

Those attending were: Dave Crawford (Chair), Cliff Watkins (Secretary), Taffy Almeida, Heather Anastos, Mike Barnes, Jeff Cheadle, Glen Clark, Robert Elkins, Cindy English, Al Hawkins, Jim Jewett, Kris Kuhl-Klinger, Joan Kessner, Larry Markel, Huei Meznarich, Karl Pool, Noe'l Smith-Jackson, Andrew Stevens, Genesis Thomas, Chris Thompson, Rich Weiss and Eric Wyse.

- I. Dave Crawford requested approval of the minutes from the June 24 meeting and hearing no objections to the minutes as presented they were approved.
- II. Dave Crawford recognized Jeff Edwards from Intera. Chris Sutton was unable to attend the meeting and asked Jeff to complete his action item to present a vision for implementation of electronic chain of custody to the Focus Group. Jeff provided a presentation including hand outs to the Focus Group. No issues with the proposed approach or impacts on HASQARD were identified by anyone present during the presentation.
- III. The Action Tracking matrix was discussed. The following updates were provided:
 - a. The process for handling inclusion of interpretations to HASQARD requirements agreed to by the Focus Group has been determined. Interpretations and de minimis changes will be posted on the HASQARD web-site. The Secretary has made contact with the ORP personnel that manager the web site that currently hosts the HASQARD document (<http://www.hanford.gov/orp/?page=141&parent=14>). The Secretary has made repeated contacts with the personnel responsible to help develop the web site, but has been told it is of low priority. Al Hawkins took the **action item** to contact the people in charge of the web site and request support.
 - b. The issue concerning the required frequency for quality systems assessments in HASQARD was not discussed. At the May 20, 2010 meeting Dave Crawford volunteered to take the **action item** to review the MSA contract to determine if there is an assessment frequency requirement for the WSCF laboratory contained in that document. The matter was tabled for the next meeting.
 - c. The action item assigned to Chris Sutton to provide the Focus Group with several “story board” presentations on how electronic chain-of-custody

might be used was determined to be completed as a result of the presentation provided by Jeff Edwards at this meeting. The action was closed and will be moved to the completed actions matrix.

- d. The action to report to review the MSA contract to determine the exact contract language under which the requirement to do a DOECAP versus HASQARD review originates was completed by Dave Crawford. Dave handed out a paper where two related references to DOECAP and/or HASQARD were found in the contract language. These references state:

“RJLG will maintain the Hanford Analytical Services Quality Assurance Requirements Document (HASQARD) for the Hanford Site. RJLG will participate in auditing functions as part of the Department of Energy Consolidated Audit Program (DOECAP).”

“RJLG will provide all administrative, technical and quality assurance resources necessary to maintain HASQARD in accordance with all applicable regulations and standards. RJLG will also create and maintain a collaborative process to maintain the HASQARD which allows for all affected contractors, the Department of Energy, and regulators to participate in the process. Any revision to HASQARD or HASQARD related documents shall be dependent on approval from principals of affected contractors and by DOE. RJLG will compare and contrast both the DOECAP and HASQARD to ensure that all applicable DOECAP quality criteria have been included in the HASQARD.”

After reviewing this language, Al Hawkins stated that they have looked into the origins of this language at DOE-RL and determined that no additional clarification for DOE’s goals in including this language in the MSA SOW will be forthcoming. Therefore, it was determined the action item was completed and will be closed.

- IV. The discussion of the action item concerning the MSA contract language requiring MSA to compare and contrast both the DOECAP and HASQARD to ensure that all applicable DOECAP quality criteria have been included in the HASQARD was used as a transition to the agenda topic of discussing the philosophy behind the current effort. Several opinions and concerns were voiced and an attempt to capture them is made as follows:

Dave Crawford highlighted the fact that the language in the SOW states: “...to ensure that all **applicable** DOECAP quality criteria have been included in the HASQARD.” Dave believes this means it is up to the technical subject matter experts in the Focus Group to determine which requirements are applicable. It does not indicate a mandate to make the two programs equivalent. The HASQARD Focus Group should determine which requirements of DOECAP/QSAS are applicable and make that recommendation to DOE for

approval.

Chris Thomas repeated his concern from the June meeting that the group really needs to take a fundamental look at where the HASQARD is going, what its purpose is and how much detail it should contain. After that philosophy is determined, the effort to compare and contract with DOECAP/QSAS can be better defined.

Al Hawkins stated that there would be two reasons to make changes to HASQARD: one would be to make it equivalent to DOECAP/QSAS the other would be to make some changes to add value to the HASQARD.

Joan Kessner provided historical perspective to the initiation of the DOECAP/QSAS efforts by DOE-HQ. The initiative seemed to gain momentum when Rocky Flats and Fernald had analytical contracts coming due for re-bid. The DOE-HQ National Analytical Management Program decided it was a good catalyst to use in developing an Inter-Contractor Procurement Team (ICPT) statement of work and auditing program. The ICPT SOW was developed first and the DOECAP followed. The QSAS was borrowed using the Air Force's similar document which is based on NELAC documents. Many DOE participants in DOECAP took exception to the original QSAS language (usually due to contractual requirements at their site or technical agreements the site had with their regulators). Therefore, the "gray boxes" were added to QSAS to clarify DOE expectations. Soon after DOECAP was implemented, Hanford asked DOE-HQ what their expectation for using DOECAP audits as the solitary audit for all DOE utilized laboratories was. No response was received from DOE-HQ on this question.

Al Hawkins does not think the DOECAP/QSAS are on the radar of the DOE-HQ QA group.

Noe'l Smith-Jackson commented that Ecology was always under the impression that the QSAS and HASQARD were essentially identical and therefore recognizing a DOECAP audit was not an issue.

Dave Crawford stated that perhaps all gaps between the DOECAP/QSAS and HASQARD should be identified and provided to the regulators before making any changes to HASQARD.

Noe'l Smith-Jackson pointed out that there was nobody from EPA present at this meeting and they should be included in the discussion. Laura Buelow had attended the first HASQARD Focus Group meeting but has not attended since.

Secretary's Note: Since conclusion of the July 20 meeting, Noe'l Smith-Jackson identified Larry Gadbois as the individual at EPA that will be tasked with following HASQARD efforts.

Larry Markel commented that the QA subcommittee is finding that there is a larger number of details than they originally anticipated that will have to come before the larger voting membership of the HASQARD Focus Group prior to approving a revision to the document.

Huei Meznarich agreed saying that especially in the radiochemistry area, QSAS is method specific. The HASQARD has never been that way and we need to decide if we would ever really want it to be written at that level of detail. Her feeling is that we wouldn't.

Joan Kessner added that the HASQARD philosophy has always been as the basis for allowing the laboratories to meet minimum expectations and then go do good work. The QSAS adds a level of detail the authors of HASQARD didn't need or want. She believes HASQARD would not be made better simply by adding everything that's in QSAS that's not in HASQARD.

Kris Kuhl Klinger agreed adding that the original intent of HASQARD was to interface with the DQO process. That is, the DQOs drive the level of specificity required for the analyses conducted for a project and specified in work orders to the laboratory. The HASQARD simply provides the base QA program requirements for analytical services.

Jim Jewett reminded the group that the QSAS is developed based on the NELAC requirements, and NELAC, in turn, is based on ISO-17025. He suggested that the NELAC standard might be about the right level of specificity.

Rich Weiss agreed that the QSAS is based on NELAC with the DOE gray boxes which may negate the NELAC material but mostly add requirements to the NELAC material in the document.

Eris Wyse stated that attempting to incorporate all QSAS details would result in so many changes that the Focus Group may end up bogged down in endless debate over one issue at a time. For example, he could envision us debating if an element of QSAS should be included in HASQARD even if it is not addressed at all by HASQARD in its current form.

Kris Kuhl Klinger stated that Eric's comments are another reason that seeing an example of another group's work would help us determine the appropriate level of effort in the other subcommittees.

Larry Markel stated that the HASQARD checklists were developed using the “shall” criteria in the HASQARD. The idea was to develop an equivalent analytical QA program from contractor to contractor at the Hanford Site. The original intent was to meet the need to look at all contractors with the same checklist to ensure consistency. Therefore, checklists should be based on all requirements in the overlying QA program document.

Rich Weiss stated that the DOECAP audits do not deviate from the checklists. He also wished that the language of the MSA contract required RJLG said: “...RJLG will compare and contrast both the DOECAP and HASQARD to ensure that all applicable DOECAP quality *concepts* have been included in the HASQARD.” Use of the word “concepts” would be preferable to “criteria” since criteria are very specific and would allow greater flexibility in the current effort at hand.

- V. The status on the subcommittees established to compare the QSAS and HASQARD requirements was provided by the coordinator for each subcommittee:

- a. Sampling: Chris Sutton (Coordinator), Wendy Thompson;

Chris Sutton was absent at the meeting, but Heather Anastos said that Chris had called her to report that due to demands on sampling personnel no progress had been made since the last HASQARD meeting.

- b. Organic Analysis: Glen Clark (Coordinator), Robert Elkins and Cliff Watkins

Glen Clark reported that the organic sub-group has completed a review of the DOECAP audit checklist lines of inquiry and HASQARD requirements including a review of the QSAS Gray Boxes to determine the basis for the DOECAP checklist items. This resulted in only 8 to 10 changes to HASQARD Volumes 1 and 4 as a result of the review. The group has produced an electronic file of Volumes 1 and 4 (Rev. 3) in Word format with track changes used to highlight the proposed changes to the HASQARD resulting from the findings of the group. After hearing Eric Wyse’s concerns about the amount of material that would need to be changed to incorporate all of QSAS into HASQARD, Glen Clark performed a more thorough review of Sections 5.7, 5.8, 5.9, and Appendices C and D of the QSAS. As a result of that review, Glen prepared a summary of additional material that would impact organic analyses and other analysis types. The summary of his results were distributed to the subcommittee. Based upon a request from the rest of the HASQARD Focus Group the materials produced to date by the organic analysis subcommittee will be forwarded to the rest of the Focus Group as an example of a path to take on this effort. The Secretary took an **action**

item to distribute the materials.

- c. Inorganic Analysis: Heather Anastos (Coordinator), Chris Thompson, Jim Jewett, Eric Wyse

Heather Anastos reported that a similar effort to that of the organic team is underway. She stated the team has spent a great deal of time discussing the approach for how to recommend a change/deletion or what to ignore as this effort proceeds. The basic issue comes down to how prescriptive a requirements document we need HASQARD to be at this time. The group had looked at doing a complete revision to incorporate all QSAS but thought that was more detail and complexity than was worth the effort. Therefore, they contemplated going back to just looking at the checklists for DOECAP and addressing those criteria only. She stated that seeing an example of what others have done would allow a basis discussing what the approach to this effort should be.

- d. Radiochemistry: Joan Kessner (Coordinator), Rich Weiss, Huei Meznarich, Karl Pool, Eric Wyse

Rich Weiss reported that the radiochemistry group has reviewed the DOECAP checklists to see how well they incorporate the “shall” requirements of HASQARD, but they have not done the inverse to compare QSAS shall statements to HASQARD shall statement and HASQARD checklists. The intent of looking at the HASQARD shall statements and comparing that to the DOECAP checklists was to ensure DOECAP audits captured the criteria important to Hanford. Through this effort they are wondering if the HASQARD checklists should be expanded to include content of HASQARD that is not associated with a “shall” statement. His gut feeling is no, HASQARD should remain as guidance as opposed to overly prescriptive.

- e. Quality Assurance/Management Systems: Steve Smith (Coordinator), Taffy Almeida, Cindy English, Larry Markel, Kris Kuhl-Klinger, and Kathi Dunbar:

Kris Kuhl Klinger stated that they will share what they have done on the QA section of the document with the HASQARD Focus Group soon. They feel they are on schedule for completion of the task.

- f. Section 5:

Steve Smith was not present but had previously reported that efforts have not focused on Section 5 specifically. They intend to incorporate the material required from Section 5 in the HASQARD revisions they propose as a result of the QA subcommittee efforts. If an analysis-specific

requirement or revision is identified, it will be discussed with the applicable sub-group prior to incorporating it in the final HASQARD revision proposals.

VI. New Business

- a. The custody seal issue was raised again by Huei Meznarich. Huei described a specific situation in which the custody tape applied to bottles becomes a safety issue. The tape tends to flare at the ends as the adhesive loses contact with the bottle through time. This adhesive can stick to lab coat sleeves and result in bottles being inadvertently dragged out of the hood and broken on the floor. Huei has proposed additional language to emphasize the need to allow deviation from the current wording when safety concerns have been raised. The Secretary took the **action item** to distribute the newly proposed revision to the Focus Group and to look at the CLP Sampler's Guide to determine the specific language concerning custody seals contained in the guidance.
- b. Noe'l Smith-Jackson asked Al Hawkins if the regulators could meet with him to discuss the MSA contract language and the potential implications it may have to the HASQARD as a result of the DOECAP to HASQARD comparison. Al Hawkins agreed to that a meeting would be beneficial and Noe'l Smith-Jackson took action to determine who should represent EPA and to schedule a meeting.

Hearing no additional new business, Dave Crawford adjourned the meeting at 4:25 PM.