

**HASQARD Focus Group**  
Meeting Minutes  
February 15, 2011

The meeting was called to order by Dave Crawford, Focus Group Chairman at 2:10 PM on February 15, 2011 in Conference Room 153 at 2420 Stevens.

Those attending were: Dave Crawford (Chair), Cliff Watkins (Secretary), Heather Anastos, Jeff Cheadle, Glen Clark, Robert Elkins, Scot Fitzgerald, Greg Holte, Jim Jewett, Joan Kessner, Jeffrey Lyon, Larry Markel, Huei Meznarich, Karl Pool, Steve Smith, Noe'l Smith-Jackson, Chris Sutton, Cindy Taylor, Chris Thompson, Amanda Tuttle, Rich Weiss, Eric Wyse.

I. Dave Crawford requested approval of the minutes from the January 18, 2011 meeting. The Secretary noted that comments were made and inadvertent omissions were also shown in the text of the minutes distributed. No objections were raised to the January meeting minutes other than a typographical error being pointed out and hearing no objections the minutes were approved. The January meeting minutes recorded that the Secretary would forward proposed revised language on MDL requirements to the sub-committee coordinators. That action had been completed by the Secretary, but because the sub-committee coordinators had not further distributed the proposal to their sub-committee members, it was requested that the Secretary distribute the proposal to the entire Focus Group. The Secretary accepted the **Action Item** to distribute the proposal as requested.

II. The Action Tracking matrix was discussed:

a. Chris Sutton reported that the action to determine if language pertaining to storage of sample containers in a "contaminant-free" environment has been revised in the Volume 2 revision being prepared is completed. Chris worked with Steve Smith and Scott Conley. They agreed to language that has been inserted in the revision to Volume 2 of HASQARD and all Focus Group members will get a look at that language upon review of the document. The proposed language says,

"Containers shall be capped and stored in an environment which minimizes the possibility of contamination of the sample containers. If contamination of the stored sample containers occurs, corrective actions shall be implemented to prevent reoccurrences. Contaminants can be defined to be volatile or semi-volatile chemicals such as spray lubricants, cleaning chemicals etc, that if leaked, spilled, sprayed, used, or otherwise discharged have the potential to contaminate the sample containers."

The action item is closed and will be moved to the completed action matrix.

- b. The action to prepare an annual report document the 2010 HASQARD Focus Group activities was discussed. This effort was discussed with MSA senior management and because there is no requirement to complete an annual report and the value of the document seemed negligible, it was determined this activity would be cancelled.

The action item is closed and will be moved to the completed action matrix.

- c. The action item related to organizing a working group to address the HASQARD language regarding independent assessments to ensure the language addresses all organizations requiring assessments (i.e., sampling organizations and laboratories), acceptable methods for meeting the independent assessment requirement, the thoroughness of the assessment and the frequency required was discussed. There have been no new suggestions or activities toward completing this action since the last meeting. The action was deferred one more month.
- d. The issue of the posted deminimis language for use of custody seals was discussed. Huei Meznarich and Jim Conca had the action to present new proposed language to the Focus Group at this Focus Group meeting. No progress had been made on this issue since the January meeting and the matter was deferred until the April meeting.
- e. There has been no change in the schedule for presentation of the subcommittee recommendations for revision to the HASQARD document. Therefore, an updated schedule was not printed or provided for this meeting. The schedule will be update based on input at this meeting and provided at the March meeting.
- f. At the January 18 meeting, a discussion on the QSAS language concerning blank contamination was held during the organic subcommittee's presentation of proposed revisions to HASQARD. Eric Wyse accepted the action to provide revised language for consideration for Volume 4, Section 6.1 on actions required when blank contamination is encountered. Eric provided the proposed language and it was discussed. Eric's main goal in his proposal was delineating the fact that when you identify a source of contamination and remove it that this is enough of a corrective action rather than needing to perform and/or document additional actions to prevent recurrence. Eric provided additional rationale for his proposed revision to the QSAS wording. The Focus Group provided slight adjustments and the personnel present seemed satisfied with the final wording inserted in the organic subcommittee's proposed revisions.

The action item is closed and will be moved to the completed action matrix.

g. At the January 18 meeting, a discussion on the QSAS language concerning second column qualitative analyte confirmation was held during the organic subcommittee's presentation of proposed revisions to HASQARD. Huei Meznarich accepted the action to provide revised language for consideration for Volume 4 concerning confirmation requirements. A long discussion with no final resolution was held. The result was deferring this discussion one additional month during which Rich Weiss and Huei Meznarich will work together to draft proposed language for inclusion in the organic subcommittees proposed revisions to the HASQARD.

III. Larry Markel requested that an agenda item be added to this month's meeting to provide time for an Integrated Contractor Assessment Team (ICAT) discussion on HASQARD audits and Evaluated Suppliers List (ESL) listing needs for WRPS provided by MSA. The issue is that MSA provides WRPS vendor auditing services through the AVS organization. The AVS maintains an Evaluated suppliers listing for, among other things, laboratories utilized by WRPS. The WSCF laboratory is not currently listed on the MSA ESL. WSCF is listed on the WRPS and CHPRC ESLs with an expiration date of the end of August 2011. PNNL is 18 months past-due their triennial audit by AVS. The PNNL expiration date on the MSA ESL has been extended because AVS said they have not had the auditing resources to support the triennial audit. When WRPS QA personnel asked AVS if the PNNL audit will occur as scheduled, they were told that AVS is expending all resources trying to get new suppliers initially qualified and re-evaluations are taking a lower priority. Glen Clark took the **Action Item** to contact the AVS, inform them of the need/desire to audit the laboratories and volunteer to provide HASQARD auditors from the HASQARD Focus Group that would have no conflict of interest at the laboratory being audited.

IV. The schedule status of the subcommittees established to compare the QSAS and HASQARD requirements and propose revisions to the HASQARD accordingly was discussed.

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

Chris Sutton reported that the draft of the revision to Volume 2 has been completed and has been sent to the document preparation team for one final review and comment prior to presenting it to the Focus Group.

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

Heather Anastos reported that the inorganic subcommittee is on schedule

to meet all milestones shown on the last updated schedule.

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

Joan Kessner reported that the radiochemistry subcommittee is on schedule to meet all milestones shown on the last updated schedule.

## V. New Business

There was no new business brought to the Focus Group this month other than that detailed in item III above.

### HASQARD Revision 4 Proposals:

Steve Smith, the HASQARD Management Systems Subcommittee Chairperson, presented the proposed revisions to HASQARD Volume 1 as a result of the DOECAP/QSAS/HASQARD gap analysis conducted by the subcommittee.

The proposed additional language for Section 2.0 drew a long discussion by the Focus Group members present. The prevailing opinion amongst the Focus Group membership was that some of the proposed new language was better suited for contractual language and/or statements of work produced at the time laboratory services are procured.

Other comments recorded during the discussion of the proposed new bullets for Section 2.0 include:

A discussion of the use of the term “data integrity” ensued. There was a variety of opinions on what this term meant. The group liked the concept of using the term as long as what is meant by “data integrity” is defined in the document. Steve Smith committed to add a proposed definition of “data integrity” to the Volume 1 proposed revisions.

A new section on “Contract Review” requiring the laboratories to review contracts received to ensure properly trained personnel were used, the correct methods used as specified in HASQARD, etc. was discussed. Eric Wyse stated that the QSAS was developed based on ISO 17025, which includes a section on Contract Review. The placement of this language in the HASQARD versus in contract statements of work was debated.

Chris Sutton suggested that any reference to contractual requirements in HASQARD should also look this topic in the context of flow down of requirements. He also added that the subcontracting that is done from the requestors of analytical services to commercial laboratories may provide

additional credence for a need for language in HASQARD requiring review on contractual requirements.

The action taken by Steve Smith on this section was to look at the proposed revisions in the context of what is already typically captured in laboratory SOWs and add only that material that is not covered in SOWs.

A revision to Section 2.2 that would specify requirements for protection of confidentiality and proprietary rights was discussed. The Focus Group members present suggested that this language was better suited for contracts to off-site laboratories and is already covered by the confidentiality agreements signed by all on-site personnel at the on-site laboratories.

A proposed revision to Section 2.2.1 on organizational structure would specify that staff and management shall be free from undue pressure due to internal or external pressures due to financial, production, schedule, etc. constraints. Chris Sutton mentioned that this statement is covered in a general statement in management policy in section 2.1. Heather Anastos commented that with all the proposed revisions the groups come up with, we should be looking at whether the new wording adds value to the document. She felt that in this case some of the words would be a good addition. None of the Focus Group members present disagreed with this position. Steve Smith said the subcommittee would try to combine the general statement to with the greater specificity in the proposed revision in order to retain the good parts of this statement.

A proposed revision to Section 3.3 adding specificity to the requirements for training records was accepted by the membership without comment.

The group proposed a revision to Section 4.1.4 specifying requirements for reporting analytical results. The Focus Group members present seemed to think this material was misplaced in Section 4.1.4, “Analytical Procedures” and should be captured in HASQARD in another location. The subcommittee took the action to add a separate section to this part of the document titled “Reporting Analytical Results” or find a more appropriate location for the proposed revision.

A proposed revision to Section 5.1, “Corrective Action,” was discussed. The proposed language concerned the actions required when customer complaints are received. Rich Weiss took the **Action Item** to determine if the material concerning customer complaints shouldn’t be placed elsewhere in the document, but the Focus Group members present concurred that the portion of the proposed revision concerning corrective action should be retained in this section.

A revision to Section 5.0, “Corrective Action and Quality Improvement,”

detailing the time frame within which quality problem must be identified was discussed. The HASQARD currently specifies no time frame and the QSAS uses the word “immediately.” The Focus Group members present felt that the words “as soon as practicable” were more appropriate and reasonably achievable.

A proposed revision to Section 5.1 included a long bullet stating that when data quality is impacted, the actions to be taken are to notify the client and agree to corrective action was accepted without comment by the Focus Group members present.

A proposed revision to Section 6.1, “Document Control,” requiring the same people that reviewed the document initially to review revisions to controlled documents prior to their approval for use was approved by the Focus Group members present with no comments because it was language equivalent to NQA-1 language on the same subject.

The subcommittee proposed a large revision to Section 6.1 that the Focus Group members present suggested the last paragraph be moved to Section 6.3 and the other three new revisions be retained in Section 6.1.

Because the end time for the meeting was reached, and hearing neither additional new business nor objections to the proposal to adjourn, the meeting was adjourned at 3:57 PM. The next meeting is scheduled for March 15, 2011 at 2425 Stevens, Room 208.