

HASQARD Focus Group
Meeting Minutes
July 23, 2013

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:05 PM on July 23, 2013 in Conference Room 308 at 2420 Stevens.

Those attending were: Huei Meznarich (Focus Group Chair), Cliff Watkins (Focus Group Secretary), Jeff Cheadle, Glen Clark, Joan Kessner, Charleston Ramos, Chris Sutton, Steve Smith, Rich Weiss and Eric Wyse.

- I. Huei Meznarich requested comments on the minutes from the June 18, 2013 meeting. One Focus Group member provided a comment on the June meeting minutes and, after addressing the comment and hearing no objections, the minutes were approved.

- II. Announcements relative to the composition of the Focus Group were made. Larry Markel has retired and, as a result, will no longer be a Focus Group member. Additionally, Charleston Ramos of MSA Environmental Surveillance was introduced as a new member. The remaining Focus Group members present introduced themselves to Charleston and identified their company and organizational affiliations.

- III. A discussion of the latest efforts to complete Revision 4 of HASQARD Volume 1 was held:
 - a. Glen Clark provided comments on the latest proposed revisions to Volume 1 that had been distributed to the Focus Group prior to the meeting. The comments that required editorial changes to the document were made in the working electronic version.

 - b. At the June meeting Rich Weiss had presented a proposed revision to Volume 1, Section 4. The group generally concurred with the recommendations made as documented in the June meeting minutes. At the July meeting, it was suggested that the term “modification” be defined more clearly as it relates to the title of Section 4.7 “Modification of Required Regulatory Methods.” Rich Weiss agreed to prepare proposed language to address the need for this definition.

Chris Sutton noted that modification is currently defined in HASQARD Revision 3 (Section 4.3.2.2.3) as:

“Definition. Modification changes the character of a procedure, and potentially limits a procedure’s ability to meet the originally stated precision, accuracy, detection limit, selectivity, and QC criteria. Because

the impact of such a modification cannot be ascertained before implementation, it must be demonstrated by application. Documentation requirements are discussed in Section 4.3.3.2.3.

Examples. Examples include using closed vessel digestion instead of standard beaker digestion, using alternate reagents for waste management or safe handling considerations, using different sample sizes accompanied by non-ratioed reagent addition, using alternate analytical technology, and using extended holding times.

Mixed waste samples provide a good example of the need for method modification. These samples can contain high levels of radioactivity that can create the necessity for analytical procedure modifications. In particular, Hanford Site samples may contain salts that negatively impact the efficiency of published methods designed for the preparation of waters, soils, and sludges. Disposal of mixed waste also impacts the decision to use a procedure as-is or to modify it to reduce the amount of waste produced during processing. Special handling techniques might need to be employed to keep the exposure to radioactive agents to a level as low as reasonably achievable (ALARA); the ALARA principle might also impact holding times.”

- c. The Focus Group spent a great deal of time discussing language that has been proposed for removal from HASQARD Volume 1. This discussion occurred because the working file of Volume 1 that was distributed prior to the meeting had not been completely reconciled with Rich Weiss’s proposed revision to Volume 1, Section 4. Specifically, the Focus Group discussed the difference between a major and minor change and the level of reviews required to approve changes at these “levels.” The language concerning major and minor changes has been proposed for deletion, but the Focus Group debated its retention. The Focus Group agreed that it’s difficult to have a group consensus on what constitutes a “major” or a “minor” change and agreed with the Rich Weiss’s proposed Section 4 which will delete references to major and minor procedural changes.
- d. In discussing Section 6.1 of the proposed revision to Volume 1, the Focus Group discussed the language concerning review of a procedure. The language in HASQARD says, “Revisions to instructions, procedures, and drawings that affect the process or are technical in nature shall receive the same level of review and approval as the original document. Editorial changes may be made to instructions, procedures, and drawings without review and approval.” The Focus Group discussed whether to have the same “level of review” for any changes or whether this applies to only “major” changes. Similar language exists in NQA-1-2008, Section 301 stating that “major changes” to documents “...shall be reviewed and approved by the same organizations that performed the original review

and approval unless other organizations are specifically designated.” Some members present at the meeting expressed an opinion that the current language in Revision 3 of the HASQARD concerning the level of review and approval for changes made to procedures, instructions, and drawings is satisfactory. However, one member expressed concerns about the HASQARD wording on level of review and approval. The Focus Group members will evaluate this issue and discuss it again.

- e. The Focus Group discussed the applicability of DOE Order 200.1. This order requires archived information to have an access log present showing names of people that have accessed the documents. The Focus Group agreed that this not need be addressed specifically in HASQARD since records are managed by each company’s records management procedures in a manner consistent with the Order.

- f. In Section 6.3.3 was a statement saying, “When no more entries are to be made on a page, unused portions of the page will be struck out, signed/initialed, and dated by the person who performed the last activity documented. This occurs at the end of the last activity performed or as soon as practical thereafter.” The Focus Group discussed actual practices in the laboratories represented in the meeting. The Focus Group also agreed that the second sentence is too subjective and the basis for the requirement was not clear other than a notation that it was drawn from the Quality System of Analytical Services (QSAS), Section 4.12.2.4, Note 4.12 DOE-6. Therefore the Focus Group agreed to revised languages saying: “When no more entries are to be made on a page, unused portions of the page will be struck out, signed/initialed, and dated.” The Focus Group also discussed when logbook pages are required to be signed. The Focus Group determined that the language on this requirement currently in the draft revision is satisfactory.

The Focus Group Chair recognized that the meeting time was ending and suggested that the meeting be adjourned. Hearing no objections, the Chair adjourned the meeting at 4:25 PM.

The next meeting is scheduled for August 20, 2013 at 2:00 PM in 2420 Stevens, Room 308.