

HASQARD Focus Group
Meeting Minutes
October 22, 2015

The meeting was called to order by Cliff Watkins, HASQARD Focus Group Secretary at 2:05 PM on October 22, 2015 in Conference Room 328 at 2420 Stevens.

Those attending were: Jonathan Sanwald (Mission Support Alliance (MSA), Focus Group Chair), Cliff Watkins (Corporate Allocation Services, DOE-RL Support Contractor, Focus Group Secretary), Glen Clark (Washington River Protection Solution (WRPS)), Fred Dunhour (DOE-ORP), Joan Kessner (Washington Closure Hanford (WCH)), Karl Pool (Pacific Northwest National Laboratory (PNNL)), Matt Romano (WRPS), Noe'l Smith-Jackson (Washington State Department of Ecology), Chris Sutton (CH2MHILL Plateau Remediation Company (CHPRC)), Chris Thompson (PNNL), Wendy Thompson (MSA), Rich Weiss (WCH) and Eric Wyse (Advanced Technologies and Laboratories International (ATL)).

- I. Cliff Watkins stated that in accordance with the HASQARD Focus Group Charter, the Contractor having contractual responsibility for coordination of HASQARD, MSA, is to nominate the Focus Group Chair at the October meeting. The Secretary stated that the QA Manager at MSA has nominated Jonathan Sanwald to serve as the Focus Group Chair and voting member for MSA. One of the voting members (Joe Archuleta-CHPRC) was not present at the meeting, but a Focus Group member present from the company the absent members represents (Chris Sutton) stated he was delegated voting authority for this meeting. The Secretary requested a vote from the voting members concerning the nomination of Jonathan Sanwald to serve as Focus Group Chair for FY 2016. By unanimous vote, Jonathan Sanwald was elected to serve as the HASQARD Focus Group Chair for FY 2016.

- II. The Secretary requested input on whether in the contracts for the various members of the Focus Group that were present have been formally modified to require implementation of Revision 4 of HASQARD. The DOE-ORP contractors have not implemented HASQARD Revision 4 because the related proposal from WRPS (222S Laboratory Operator) is still under evaluation and the new contract to perform routine analyses at the 222S Laboratory was recently awarded to Wastren. The solicitation for the 222S contract referenced HASQARD Revision 3 and therefore all proposals received from prospective companies contained costs associated with managing the analytical services in accordance with HASQARD Revision 3. Wastren has not fully transitioned to management of the laboratory. When the results of subsequent negotiations are finalized, DOE-ORP will issue contract modifications to WRPS and Wastren to implement HASQARD Revision 4. The representatives from CHPRC and WCH indicated they both have received direction from DOE-RL to implement HASQARD Revision 4. The direction

to CHPRC was received less than a month prior to the October 20 Focus Group meeting. Jonathan Sanwald stated that MSA has implemented HASQARD Rev 4.

- III. The status of action items from the May 26 meeting were discussed:
- a. It was stated that Joe Archuleta is working on updating audit checklists for HASQARD to reflect the HASQARD Rev 4 requirements. Jonathan Sanwald stated he would contact Joe Archuleta to discuss this effort. Glen Clark stated that WRPS won't be updating their checklists until HASQARD Revision 4 is directed as a requirement in their contract.
 - b. At the May 26 meeting, Rich Weiss took the action item to look into the language in the Note in Volume 4, Section 6.4.2 that is causing a technical issue. The note states, "NOTE: The laboratory must be capable of achieving an EQL less than or equal to 10 percent (for cyanide, hexavalent chromium, and IC) or 50 percent of the decision level or must negotiate an acceptable alternative. All affected samples in the preparation batch will be re-prepared and analyzed if the preparation blank (method blank) fails to meet the acceptance criteria." The issue with this language is that none of the laboratories CHPRC has under contract can achieve an EQL of 10% of the decision level for hexavalent chromium. Chris Sutton noted that for some constituents, Ecology is using the statistical mean of the EQLs reported by accredited laboratories for clean-up level. This practice results in about 50% of all accredited laboratories not being able to achieve an EQL that provides usable data. Rich stated that in researching the issue he found several similar notes throughout HASQARD Revision 4. Rich stated that he would suggest that if these notes are retained in Revision 5 of HASQARD that neither MDLs nor EQLs should be referenced in comparison to risk-based concentrations or defer to something closer to the language the Washington State Department of Ecology is using to reference quantitation limits. The Focus Group also agreed that it may be possible to eliminate the notes in question in favor of the quality control limit tables that are already present in the document.
- IV. New business that was provided to the Secretary for addition to the meeting agenda was discussed:
- a. Jonathan Sanwald asked about when HASQARD compliance is mandatory for analytical laboratories providing analytical services to the Hanford contractors. Jonathan's question was based on confusing direction he is getting from MSA management regarding conduct of HASQARD audits on commercial laboratories. Jonathan stated that he was recently instructed that the MSA AVS organization approves commercial laboratories based on the results of DOECAP audits which are

not using HASQARD as the basis for their QA requirements. Chris Sutton stated that CHPRC had to revise language in the SOW they are using to obtain analytical services from commercial laboratories because MSA would not be auditing laboratories to HASQARD. Glen Clark mentioned that WRPS and WCH both participate in DOECAP audits. Glen state that Robert Elkins has developed a “gap” checklist to ensure those elements of HASQARD not covered by the DOECAP audit are captured during the audit. Jonathan Sanwald stated he would follow-up with WRPS to obtain a copy of that gap checklist. Rich Weiss added that when he is participating as a DOECAP auditor, he also follows up at laboratories where a HASQARD-specific finding had been noted in previous audits. Joan Kessner stated that at one point during the WCH contract period, their QA organization asked them to conduct HASQARD audits at all of their analytical services suppliers and the DOECAP audits have served as a continuing approval tool since the time those audits were conducted. Therefore, someone from WCH has been to all the WCH laboratories to review HASQARD compliance at least once. Karl Pool stated that at PNNL there are some senior level QA personnel of the opinion that HASQARD compliance is not required at PNNL. Noe’l Smith-Jackson asked Jonathan to clarify that what he was saying was that MSA was going to evaluate DOECAP criteria only in upcoming laboratory audits or rely solely on DOECAP to approve laboratories. Jonathan stated that this is why he requested this topic be discussed as he was confused about the basis of requirements for HASQARD. Chris Sutton stated that performing HASQARD-specific audits would be construed as conducting duplicative audits which has been prohibited by DOE. Glen Clark stated that “policy” from DOE-HQ does not necessarily require implementation unless specifically placed in the contracts held by the contractors, especially if the policy contradicts other contractual obligations. Jonathan suggested that the Focus Group should issue a recommendation on how laboratories are to be approved, audited, evaluated, etc. given the confusion surrounding the requirements to comply with HASQARD. Rich Weiss stated that the Focus group would be the proper resource to compile and agree with a gap checklist for use during DOECAP audits. Jonathan Sanwald recently requested some DOECAP audit reports and received a warning saying that they are not to be construed as instruments of approval or certification in any way. He also stated that it is difficult to obtain these reports. Rich Weiss stated that the DOECAP web site is not restricted to auditors but access to audit reports must be requested by showing a documented need to know. Fred Dunhour stated that the company doing the procuring of the services would need access to the DOECAP reports. Chris Sutton reacted to the warnings on DOECAP reports that state the reports are not to be used as basis for approving a laboratory by saying that the CHPRC contract requires the company to use MSA AVS in approving suppliers of QL-1 activities, which analytical services are. Eric Wyse stated that the

introductory sections of HASQARD specify when HASQARD is required. He asked if the TPA references HASQARD specifically and was informed it does not. Apparently, there was intent to reference HASQARD in the TPA, but that did not happen in the final document. Glen Clark added that DOE has taken the position that we meet the TPA QA requirements for analytical measurements conducted in support of the TPA by complying with HASQARD. As a result, HASQARD has been flowed down in contracts where analytical services are required. After this discussion, Jonathan stated that it would be good to know how the different contractors view the relationship of DOECAP and HASQARD and how they suggest the approach be unified. Jonathan will contact Joan, Glen, Chris and Joe Archuleta to determine the best course of action.

- b. The HASQARD document contains a requirement that states:

“Records shall be classified, retained, and dispositioned in accordance with the *National Archives and Records Administration Act of 1984*, and DOE Order 200.1, *Information Management Program*. Written approval must be received from all affected clients, prior to disposal of any records associated with DOE analytical data.”

Prior to the meeting Jonathan Sanwald requested an agenda topic be added to discuss the intent of requiring compliance to the National Archives and Records Administration Act of 1985 and DOE Order 200.1A. From the perspective of the AVS auditing organization, further specifics on what parts of the Act are important for compliance are needed. Jonathan stated that after a HASQARD audit, one laboratory stated that there is no value for citing these two documents specifically in their QA Program. The laboratory had looked at the documents stated a belief that the laboratory was substantively compliant but could give no specifics. Jonathan wanted to know how the Focus Group would suggest the HASQARD auditors respond to this laboratory. He added that it could take a 10-15 page checklist to audit to the requirements of the cited documents and another 10 page checklist to verify NARA/200.1A may be more than is required for a HASQARD Audit. Eric Wyse concurred and suggested that there may be four or five elements of those documents that would be of greatest concern for the HASQARD user community. Rich Weiss gave the history of this requirement. Rich stated it was present in HASQARD Revision 1 and has been carried through with nobody bringing it up as an issue. Originally, the DOE Order reference was 1324.5B and when that Order was superseded by Order 200.1A, it appeared. DOE Order 200.1A is more applicable to electronic records and therefore, it is not really very applicable to cite it in the section where it appears in HASQARD. Chris Sutton and Rich Weiss concurred that there are likely a few requirements of the referenced documents that are of most importance and it is possible that those requirements are already specified in HASQARD. The

Secretary placed a comment in the Revision 5 working file that the requirement to adhere to the National Archives and Records Administration Act of 1985 and DOE Order 200.1A should be investigated for applicability and/or redundancy when preparing Revision 5 of HASQARD. Jonathan Sanwald will look at adding one or two lines of inquiry to the HASQARD auditing checklist to address critical requirements of the two referenced documents.

- c. Chris Sutton made everyone aware of the fact that EPA has now placed Update 5 of SW-846 on the SW-846 On-Line web site. He said that of specific interest to the Focus Group, based on discussions the group has had in the past, is the fact that Chapter 1 of SW-846 now contains no mention of the term method detection limit (MDL). The term lower limit of quantitation is now used to discuss detection of low concentrations of analytes. Chris also stated that the Federal Register recently contained EPA's proposed revision for 40 CFR Part 136 methods for determining MDLs. The net result of implementing this revision is that a laboratory's MDL will increase. Rich Weiss added that EPA is changing web sites so people may find that bookmarks to old EPA references may no longer work.

The Focus Group discussed the frequency at which Focus Group meetings should be held. The Focus Group stated that quarterly meetings should be held. The Secretary took the action to obtain a conference room and propose a meeting date that will likely be in January 2016. The meeting was adjourned at 4:12 PM.