

**HASQARD Focus Group**  
Meeting Minutes  
October 18, 2016

The meeting was called to order by Jonathan Sanwald, HASQARD Focus Group Chair at 2:03 PM on October 18, 2016 in Conference Room 308 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), Taffy Almeida (Battelle - Pacific Northwest National Laboratory (PNNL)), Marcus Aranda (Wastren Advantage Inc. Wastren Hanford Laboratory (WHL)), Jeff Bramson (CH2M HILL Plateau Remediation Company (CHPRC)), Glen Clark (Washington River Protection Solutions (WRPS)), Dan Coughlin (WRPS), Jim Douglas (CHPRC), Kathi Dunbar (WRPS), Scot Fitzgerald (CHPRC), Judy McCluskey (WRPS), Sarah Nagel (CHPRC), Matt Perrott (MSA), Noe'l Smith-Jackson (Washington State Department of Ecology), Chris Sutton (CHPRC), Chris Thompson (PNNL).

- I. Jonathan Sanwald requested review and approval of the meeting minutes from the last quarterly meeting of the HASQARD Focus Group held on August 23, 2016. Hearing no comments on the draft meeting minutes, the minutes were approved.
- II. Because there were some new HASQARD Focus Group meeting attendees in the room, Jonathan Sanwald requested all attendees to introduce themselves and state their affiliation with the group.
- III. The status of action items from previous meetings were discussed:
  - a. Jonathan Sanwald stated he has worked with Rich Weiss to complete a final draft audit checklist for Volumes 1 and 4 of HASQARD Rev. 4. Jonathan continued to work with Rich to remove the gap notations and to remove redundant requirements in creating the final draft of the checklists. Jonathan stated he would distribute the draft checklists to the Focus Group.

Jeff Bramson inquired whether any progress had been made by anyone on a checklist for auditing to HASQARD Volume 2. Jonathan stated he was not aware of anyone working on that effort and asked the group if anyone was. There was no response to indicate this effort has begun. Jonathan stated that he was aware of checklists for Volume 2 of HASQARD Rev. 3 but this would likely not be too helpful for Volume 2 Rev. 4 because the volume was entirely rewritten between Revisions 3 and 4. Chris Sutton agreed that not much of the "Baseline" provided by a Volume 2 checklist written to HASQARD revisions prior to Revision 4 would be helpful.

Chris added that the material in Volume 2 is much the same between Revisions 3 and 4, but the Volume was significantly reorganized in preparing Revision 4 and the repetitive content found in Volume 1 of HASQARD was removed from Volume 2. Jonathan Sanwald committed to taking on the preparation of a Volume 2 checklist.

- b. The relationship of the DOECAP, HASQARD and the MSA Acquisition Verification Services (AVS) laboratory services Evaluated Suppliers List (ESL) was discussed.

Jonathan Sanwald began this discussion by revisiting the idea discussed at the August HASQARD Focus Group meeting that the position be taken that HASQARD is applicable to sampling and analysis activities conducted on the Hanford Site only (i.e., is not applicable to commercial laboratories). Glen Clark stated that he took a look at HASQARD and believes much of it relates to samplers, data users and, given the completeness of the DOECAP audits, is not as applicable for commercial laboratories. Glen also stated that he believes that if any of the HASQARD requirements that are not being included in the DOECAP audits (i.e., are not in the Quality Systems Manual (QSM) used by DOECAP as their standard) is extremely important to the Focus Group, we could request inclusion of those requirements in one of the revisions to the QSM. Jeff Bramson reiterated the issue with requiring HASQARD application to commercial laboratories. The specific issue is that MSA AVS is not allowing statements of work (SOWs) to commercial laboratories be written with HASQARD referenced. This practice is a result of DOE direction to MSA to utilize DOECAP and to not conduct redundant audits at commercial laboratories. The DOECAP audits are to the QSM and not HASQARD, leading to a requirement disconnect. The current practices have led to CHPRC receiving an audit finding from their corporate office because it appears they are not flowing down requirements stated in HASQARD to commercial laboratories (i.e., that HASQARD is applicable). Jeff stated that CHPRC is in the process of revising CHPRC-00189, "*CH2M HILL Plateau Remediation Company Environmental Quality Assurance Program* to state that HASQARD is not applicable to commercial laboratories. However, this will not resolve the fact that HASQARD is incorporated as a requirement in the CHPRC contract and the text of HASQARD states, "The HASQARD is designed to meet the needs of the Hanford Site for maintaining a consistent level of quality for sampling and for field and laboratory analytical services provided by contractor and commercial field and laboratory analytical operations. The HASQARD serves as the quality basis for all sampling and field/laboratory analytical services provided to support the Hanford Site environmental clean-up mission. This includes services performed by contractors, subcontractors, and/or commercial laboratories and covers both radiological and non-radiological analyses."

Glen Clark stated that he believes exempting commercial laboratories from HASQARD would be acceptable and likes the idea.

Chris Thompson stated that while this may be the simplest way to address the issues facing CHPRC and MSA AVS relative to maintaining a fully compliant posture, determining the impacts of making that change may not be a trivial matter. This statement was made in the context of truly understanding the differences between the QSM/DOECAP requirements and the HASQARD requirements. Chris Sutton added that QSM Revision 5.0 is the basis for the current DOECAP audits. The QSM is in the process of being revised to Revision 5.1. Chris Sutton stated there are many changes in QSM 5.1 relative to QSM 5.0 and this trend in ever changing requirements on an annual basis is likely to continue. For this reason, Chris Sutton stated he would like to see commercial laboratories audited under DOECAP/QSM since the HASQARD cannot expect to keep up with knowing the differences and responding to them. Chris Sutton also favors commercial laboratories being audited to the QSM because in most instances, the requirements are “tighter” or “more restrictive” than HASQARD. Chris added that the requirements are more prescriptive because the basis for the QSM requirements are those found in ISO 17025 and NELAC documents.

Marcus Aranda asked if commercial laboratories were currently being audited to HASQARD requirements. Jonathan Sanwald explained the current situation (i.e., MSA AVS and other Hanford Contractor personnel participate in DOECAP audits but do not have a comprehensive list of gaps to ensure the HASQARD requirements are assessed in addition to the QSM requirements being used by the DOECAP audit team and, even if they did, would not have time to assess them). Jonathan Sanwald added that some have been audited to HASQARD but it is the exception rather than the rule. For example, Noel Smith-Jackson recalled that WCH did a HASQARD audit of Test America in Richland in 2011. Jonathan added that some of the most recent assessments of laboratories’ ability to meet HASQARD requirements have been done using the DOECAP audit results. Glen Clark stated this has been accomplished by requesting additional information from the laboratory if necessary and conducting a desk review. The method for covering the “gaps” between HASQARD and QSM after (or during) the DOECAP audits is being handled by each Contractor using their own methods (i.e., there has been no consistent method devised for assessing gaps between HASQARD and DOECAP). Jeff Bramson asked if WRPS had incorporated their method of assessing gaps between DOECAP and HASQARD audits of commercial laboratories in a procedure. Glen Clark said that WRPS had done that and Jeff requested a copy of the procedure. Chris Sutton added that he has personnel in his organization that are qualified as DOECAP auditors, participate in DOECAP audits and assess differences between DOECAP

and HASQARD when possible. Chris added that this is a good practice whether HASQARD applies to commercial laboratories or not.

The Focus Group discussion was leading toward concurrence that eliminating commercial analytical laboratories from the scope of HASQARD was the best way to resolve the issues facing the members. The Secretary asked Noel Smith-Jackson whether this would create problems with the stakeholders. Noel stated that there are several entities that will be impacted if HASQARD is no longer as universally applied to environmental analyses. These entities include the permitting organizations that have HASQARD called out in permit documents, the Tribes as they are all aware of HASQARD and ensure it is being applied. Noel committed to communicating with her counterparts at Ecology, EPA and Washington State Department of Health regarding the fact that the Focus Group is considering eliminating commercial laboratories as being applicable to HASQARD. Any concerns raised will be provided to the Focus Group for consideration.

The fact that MSA AVS often has difficulty filling audit teams to conduct HASQARD-based audits of the on-site laboratories (222S and PNNL) was mentioned. It was stated that a letter from the DOE Contracting Officers stating an expectation that the Contractors provide qualified auditors for these HASQARD audits would help.

A Focus Group member brought up the Inter-Contractor Audit Team (ICAT) audits that used to take place to assess laboratories to HASQARD. It was stated that the last ICAT audit took place about ten years ago which was about the time DOE issued expectation to use DOECAP audits and not conduct redundant audits of laboratories. The ICAT audits evolved into AVS audits at Hanford. For example, the last audit of the WSCF laboratory at Hanford was an inter-contractor team led by AVS in July 2011.

Jonathan Sanwald asked how often the QSM is updated. Glen Clark says it is updated annually. This led the Focus Group to the realization that maintaining a gap analysis between HASQARD and DOECAP would be an unrealistic expectation.

Jonathan stated that he is familiar with the MSA, CHPRC and WRPS requirements for laboratory audits and, because MSA AVS does not conduct supplier evaluations for PNNL, asked Chris Thompson if PNNL would have any significant issues if the scope of HASQARD was revised to eliminate commercial laboratories. Chris Thompson stated that he believed that there would be no big issues as long as the overlap between the DOECAP QSM and HASQARD was significant enough to cover the primary attributes of laboratory operations that affect quality. Chris added

that both documents (HASQARD and the QSM) are large and the QSM changes frequently. Therefore keeping them synchronized will be difficult at best and most likely impossible.

The Secretary stated that if HASQARD is revised to state it is inapplicable to commercial laboratories with the expectation that commercial laboratories are audited to DOECAP, then references to HASQARD in regulatory documents (e.g., permits) would not have to change.

Jonathan Sanwald stated that one final summary of the gaps between HASQARD and the current DOECAP QSM should be reviewed by the Contractor QA personnel and, if agreed, commercial laboratory compliance with HASQARD should be eliminated from the document. Glen Clark took the action item to do a thorough review of Rev. 3 of HASQARD and the DOECAP QSM to identify gaps between the two documents and provide that to the Focus Group before the next meeting. The Secretary stated that if a revision to HASQARD will be done to eliminate the HASQARD's applicability to commercial laboratories, then all of the other "parking lot" items that he has been collecting for inclusion in HASQARD Revision 5 should be included in the revision effort. Chris Sutton added that while the Focus Group is engaged in revising the document, all issues identified since Revision 4 was published should be addressed. For example, the latest revision of SW-846 has requirements for acceptable blanks contamination that is not currently found in HASQARD.

Because of the time it took to produce Revision 4 of HASQARD, the Secretary suggested that meetings of the HASQARD Focus Group go back to a monthly schedule until Revision 5 is published. Some Focus Group members stated that while they agree with that idea, their hope is that this revision will not take as long. The Secretary took the actions to schedule the conference room to support monthly meetings beginning in January 2017 and to provide initial draft language for Section 1.0 of Volume 1 of HASQARD that will eliminate commercial laboratories from the scope of HASQARD.

#### IV. New Business

- a. The fact that the link to HASQARD on the DOE Administrative Record web site was no longer present was mentioned by Noe'l Smith-Jackson. Noe'l stated that many of her colleagues utilize that link to access HASQARD and requested that it be returned. The Secretary stated that an email was sent to the webmaster for the rl.gov web sites the week of October 3, but no response had ever been received. The Secretary took the action to follow-up on this issue.

- b. Jonathan Sanwald mentioned that the gap analysis between HASQARD and the DOECAP QSM is hindered by the fact that there are 26 instances of “should” statements in HASQARD. Jonathan mentioned that he has discussed this with Rich Weiss. Rich’s recollection was that these are requirements that many HASQARD Focus Group members consider to be requirements. Chris Sutton and Chris Thompson recalled that mainly because of differences in the way the Hanford laboratories were conducting business, a consensus could not be reached on making these “should” statements requirements indicated with the word “shall.” Scott Fitzgerald recalled that some of the “should” statements were retained to indicate what the Focus Group considered to be best practice without making them a hard requirement. The compromise position was to add the “should” statement. Jonathan stated that from the perspective of an auditor, should statements are guidance and cannot be added to an audit checklist. Jonathan stated that the Focus Group needs to look at all of these should statements in HASQARD as part of creating Rev 5. Jeff Bramson added that if should statements are retained, it should be clearly stated what the expectation toward should statements are. Taffy Almeida and Jonathan Sanwald added that if the term “should” is found in HASQARD Rev 5, the definitions of “should” and “shall” should be added to the glossary. The Focus Group members agreed with someone adding that because the document will only apply to one laboratory, the “should” statements can either be revised to shall statements or they can be eliminated during this revision effort. Jeff Bramson stated that while it is true Volume 4 will apply to only one laboratory, there are “should” and “shall” statements in Volume 2 that will need to be revisited also and may result in the need for the definition of the terms “should” and “shall.” Chris Sutton added that while consolidating the “should” and “shall” terms in Volume 2 may be helpful, it may not be applicable because it is likely that each Contractor company will end up with an audit checklist for Volume 2. This is because the media to be sampled by the different Contractors varies widely. Jonathan Sanwald said that the other approach would be one Volume 2 checklist with an auditor simply indicating “NA” for lines of inquiry not applicable to the media sampled by that company.
- c. Chris Sutton mentioned that an auditor on a recent CH2M HILL corporate audit of CHPRC felt that Volume 3 was not inclusive enough. The auditor felt that the scope did not necessarily exclude analytical techniques like downhole geophysics. Chris recommended that during the production of Rev 5 of HASQARD the Focus Group take a good look at Volume 3 to either add requirements applicable to commonly used field characterization techniques or provide statement to specifically exclude them.

Hearing no additional new business, the Focus Group Chair adjourned the meeting at 3:27 PM. The next meeting of the HASQARD Focus Group will be January 24, 2017 in Conference Room 308 at 2420 Stevens.