

HASQARD Focus Group
Meeting Minutes
February 27, 2018

The meeting was called to order by Jonathan Sanwald, HASQARD Focus Group Chair at 2:07 PM on February 27, 2018 in Conference Room 223 at 2430 Stevens Place.

Those attending were: Jonathan Sanwald, HASQARD Focus Group Chair (Mission Support Alliance (MSA)), Cliff Watkins - Focus Group Secretary (Corporate Allocation Services, DOE-RL Support Contractor), Taffy Almeida (Battelle – Pacific Northwest National Laboratory (PNNL)), Marcus Aranda (Wastren Advantage Inc. Wastren Hanford Laboratory (WHL)), Linda Carr (PNNL), Steve Chalk (U.S. Department of Energy – Richland Operations Office (DOE-RL)), Glen Clark (Washington River Protection Solutions (WRPS)), Jim Douglas (CH2M HILL Plateau Remediation Company (CHPRC)), Fred Dunhour (DOE - Office of River Protection (DOE-ORP)), Joel Hebdon (WRPS), Sarah Nagel (CHPRC), Geoff Schramm, (WRPS), Paula Sellers (Waste Treatment Completion Contractor (WTCC)), Chris Sutton (CHPRC), Chris Thompson (PNNL), Rich Weiss (MSA) Tricia Wood (WHL).

- I. The Chair requested review and approval of the meeting minutes from the HASQARD Focus Group held on November 28, 2017. The draft minutes from the meeting were distributed and time was allowed for one final review. Hearing no additional comments on the draft meeting minutes, the minutes from the November 28, 2017 meeting were approved.

- II. At the November meeting of the Focus Group, a revision to the HASQARD Focus Group Charter was approved by vote of the voting members present at the Focus Group meeting. In December 2017, the Secretary started to obtain signatures from the company's QA Managers on the version of the revised Charter that was approved at the November Focus Group meeting. After getting all but one signature, the Secretary received a call from Glen Clark and Greg Hayward. These gentlemen contacted the Secretary to issue a concern that the Charter being signed stated that measures voted on only required passage by a majority vote. At the November meeting, where the Focus Group Charter was voted on, the voting member for WRPS (Glen Clark) was not present. The concern was that the HASQARD document could be revised and issued without a consensus vote. The Secretary agreed that this needed to be addressed, revised the language concerning measures and votes in the Charter and presented the revised language to the Focus Group. No comments on this revised language were heard. The Secretary also added language to the Charter to address the fact that some of the Hanford Prime Contractors have delegated their voting membership to personnel that are employees of companies that are subcontracted to the Hanford Prime Contractor. To ensure this practice was understood as being acceptable, the Secretary provided new proposed language for the Charter specifying that

delegation of voting membership to a subcontractor is allowed. No objections to this addition to the Charter were heard. The Chair called for a vote on the revised HASQARD Focus Group Charter.

All voting members were present and the revised Charter was approved by unanimous vote.

The Secretary took the action to obtain signatures on the Charter and, once obtained, send the signed Charter to the Focus Group membership.

Also in December 2017, a representative of WRPS management, Joel Hebdon, contacted the HASQARD Focus Group Secretary to issue a concern that the HASQARD Focus Group was not operating with the same level of visibility and authority as some of the other site-wide committees. Joel requested a meeting between himself, the Focus Group Secretary and several members of DOE-RL and DOE-ORP to discuss this. The meeting was held on December 20, 2017. The Secretary asked Joel if he would like to brief the Focus Group on the purpose of the meeting and his position. Joel stated that he believes that the HASQARD Focus Group and HASQARD document should be considered on the same level as the site-wide committees that develop the Hanford Site safety manuals (e.g., the Hoisting and Rigging, Fall Protection Program and confined Space Program manuals). If HASQARD was at the same level as these safety manuals it would have Senior Management Team (SMT) buy-in and visibility. This level of representation and oversight would ensure greater knowledge of, and compliance with, HASQARD across the site.

For example, Joel stated that as a member of WRPS management he should have been (but never was) presented with the letter from the DOE-ORP Contracting Officer (CO) requesting the WRPS position on the costs associated with implementing Revision 4 of HASQARD. Joel stated that WRPS has recently hired Geoff Schramm to integrate environmental QA (including compliance with HASQARD) across the company. Both Geoff and Joel stated that SMT oversight of HASQARD would enhance their ability to ensure compliance with the document within the company. Geoff stated that many environmental sampling documents will reference compliance to HASQARD but many of the document authors (and/or field personnel implementing the documents) don't know what that means. At WRPS, the subject matter expertise relevant to HASQARD has been largely isolated to the 222S Laboratory operations. There have been very few assessments to determine HASQARD compliance in the field sampling being conducted and a good knowledge of how to approach HASQARD in the tank farms environmental work has been almost non-existent.

Glen Clark added that a cost analysis for implementation of Revision 4 of HASQARD was done at the 222S Laboratory and the price tag was

approximately \$750K. This resulted in DOE-ORP instructing WRPS to not implement Revision 4 of HASQARD and continue to work to Revision 3. Glen said the intent will be to get the wording that caused the cost increase to exist fixed as part of the effort to produce Revision 5 of HASQARD. Glen also stated that hiring Geoff Schramm to address environmental QA more comprehensively will help the company.

Chris Sutton stated that when the DOE-RL CO sent the letter to CHPRC requesting cost impacts associated with implantation of Revision 4 of HASQARD, the letter was distributed to all groups within the company. All groups in the company were required to provide feedback.

Fred Dunhour said that DOE-ORP did receive the evaluation of costs associated with implementation of Revision 4 of HASQARD from WRPS which resulted in the decision to not implement Revision 4.

Joel Hebdon stated that the SMT should sponsor HASQARD also which would give more authority to any initiatives the Focus Group may undertake. Joel suggested that the Focus Group Secretary look into the SMT processes and procedures and see if HASQARD is a good fit. Joel believes that it would be good for the HASQARD Focus Group to have visibility on the SMT and it may lead to better outcomes when costs are assessed as the document is revised.

III. The Focus Group began discussing the efforts to produce Revision 5 of HASQARD.

One Focus Group member stated that the HASQARD and one organization's QA Plan contradict each other.

Steve Chalk stated that HASQARD should not be viewed as a QA Program Plan because it does not contain all elements required in a QA Program Plan. Rather, it should be viewed as something closer to an implementing procedure that explains the "how" behind how the larger QA program or DOE Order 414.1D is implemented to meet requirements.

Chris Sutton stated that some personnel that are newer to the intent and use of HASQARD have interpreted compliance with the document meaning that every organization in the company needs to comply with HASQARD at all times.

Geoff Schramm added to these points by saying that we need Revision 5 to specify what HASQARD is intended to be and not be more clearly. That is, is it just applicable to laboratory operations and field sampling? If so, why are there procurement requirements in it? These sections lead to confusion in the QA groups implementing HASQARD.

Chris Sutton agreed saying that this clarification is the direction HASQARD needs to go in its next revision. Chris used the Assessments section as an example. It needs to be clear that the assessments discussed in HASQARD are those that are expected at the laboratories being used to analyze samples. While the scope section of HASQARD states it is applicable to laboratories and field sampling organizations, it does not mean that all of the assessments mentioned in HASQARD are necessarily meant to be applicable to all field sampling organizations and therefore are assessments that the Contractor's QA organization needs to do at the frequency specified in HASQARD.

Rich Weiss stated the intent of HASQARD was to provide requirements and guidance for sampling and analytical processes. The ramifications of that led to broadening the applicable scope to look at all company systems. Language probably needs to be added to ensure the document remains focused on sampling and analysis.

Paula Sellers stated that the TPA Action Plan provided the basis for development of HASQARD.

Joel Hebdon added that the TPA language has been modified through the years. He stated that to him, it is very confusing. The laboratories have a handle on their responsibilities relative to implementation of HASQARD. The field organizations, on the other hand, will say it does not apply to them or it applies in some specific fashion but it does not all apply. This leaves the interpretation of HASQARD to the performing organizations.

Chris Sutton stated that the last revision of HASQARD focused primarily on Volume 4. Not much effort was spent on Volumes 1 and 3. Volume 2 was completely rewritten and once comments were accepted was set aside while the work on the other Volumes concluded.

Glen Clark stated that there are some potential applications for HASQARD where its applicability has been questioned or it is not clear whether it applies or not. For example, air analyses. Glen said that one could ask the question, does HASQARD apply to air analyses? In reviewing the scope statements in the document, the answer would be yes, if the air analyses are being conducted for environmental cleanup purposes.

The Secretary stated he has been capturing "parking lot" comments and issues with HASQARD for inclusion in Revision 5. However, the idea of putting the document up on a screen in a Focus Group meeting and beginning to revise it as a group seemed terribly inefficient. He asked if the approach should be to form subcommittees focused on each volume and bring the proposed revisions to the Focus Group for discussion.

Chris Sutton stated that he believes that if the right people got involved in the effort that we could make headway on Revision 5 in short order.

Marcus Aranda stated that if the subcommittee approach is taken, he would like to participate on the Volume 4 subcommittee because he knows the quality control limits expressed for several methods in HASQARD needs to be updated.

The Secretary stated that he will send out an email asking for volunteers to serve on the subcommittees and after two weeks contact the teams to let them know who they are. The Secretary recalled a comment in earlier HASQARD Focus Group meetings regarding Volume 3, its applicability, the redundancy between Volume 3 and 4, etc. He asked if Volume 3 is still needed.

Chris Sutton stated that there are groups within CHPRC that are conducting field analyses (e.g., at groundwater treatment facilities) and Volume 3 is a good source of QA requirements for them. Chris added that Volume 3 does contain a lot of content that is redundant with Volume 4. It is possible that Volume 3 could be reduced in size and maybe even made into an appendix to Volume 4.

Joel Hebdon added that the Industrial Hygiene (IH) group at WRPS has a QA Plan that states they implement HASQARD. One of the Focus Group members stated that the scope section of HASQARD mentions that it is not applicable to IH analyses. Sarah Nagel stated that while IH analyses are excluded in the scope section of HASQARD, it is stated that American Industrial Hygiene Association (AIHA) methods may be used in other sections of the document. This leads to a level of confusion regarding the applicability of IH analyses in HASQARD. Glen Clark mentioned that one of the reasons IH analyses were excluded from HASQARD was that laboratories contracted to conduct these analyses are not approved using the HASQARD as the basis of QA requirements. Rather, similar to the practices of DOD, IH laboratories are typically approved by the fact that they maintain an AIHA certification.

Regarding the applicability of Volume 3 to IH or any other analyses being conducted in the field, Glen Clark stated that the HASQARD should distinguish between analyses conducted to control a process (like the analyses that will likely be conducted at the analytical laboratory at the WTP) from those made to make an environmental regulatory decision. Chris Sutton agreed that the focus for the WTP in five years or so will likely be process control. Fred Dunhour added that the focus on the WTP analytical needs will be based on the yet to be approved waste analysis plan and/or waste acceptance plan.

Chris Sutton reiterated that the Volume 3 subcommittee should focus on elimination of redundant requirements. The Secretary recalled that there was

a basis for redundancy in Volume 3. Specifically, past efforts to produce Volume 3 wanted the Volume to be able to “stand alone” with Volumes 1 and 2. That way, a field organization that was going to be conducting field sampling and field analysis could use volumes 1, 2 and 3 without ever having to know what Volume 4 had in it.

The subject of whether HASQARD is a guidance document or requirements document was discussed. The Focus Group agrees that it is a requirements document that contains some best practice recommendations as guidance. Glen Clark stated that notes could be added to highlight guidance statements to ensure the rest of the document is viewed as requirements.

Joel Hebdon stated that if HASQARD is a guidance document, WRPS will only pull what they want from it. If it’s a requirements document, as he looks at it being now, then it is specifying policy and strategy.

Paula Sellers added that HASQARD should be viewed as an addition to the QA Manual specific to the area of environmental sampling and analysis.

- IV. The Secretary stated that DOE-RL has not received any communication from Steve Clark (DOE-HQ) regarding the status of the DOE Consolidated Audit Program – Accreditation Program (DOECAP-AP). He asked if anyone in the Focus Group could provide an update.

Rich Weiss stated that the DOECAP-AP is still in final stages of development. There was a recent conference call that he listened in on. One matter of concern was the Version 5.1.1 of the Quality Systems Manual (QSM) used as the basis of requirements for the DOECAP-AP was recently issued. Steve Clark provided the DOECAP auditors with a summary of the revisions that were made in Version 5.1.1 of the QSM. Rich found Steve’s summary to be inadequate to fully describe the significant changes. Specifically, his summary of the performance testing (PT) section was not adequate. The DOECAP-AP has initiated the observers program and held a conference call to train the observers. Someone asked if the revised audit checklists to support QSM Version 5.1.1 are out yet. None of the DOECAP auditors have seen the revised checklists. The first DOECAP-AP audit is still not scheduled. Rich stated that all of the laboratories have negotiated a schedule with the Accrediting Bodies (ABs).

Taffy Almeida said that she had attended a meeting recently where she sat by Mike Damon from Southwest Research Institute (SwRI). At that meeting, Mike told Taffy that SwRI did not intend to sign up to be audited and accredited by the DOECAP-AP. Sarah Nagel added that one of SwRI’s chemists had been talking with her recently and the chemist said that SwRI will participate in the DOECAP-AP with a very limited scope of accreditation. They want to be accredited for analysis of highly radioactive samples and for

research studies they perform for DOE clients but not for anything that would be considered “routine analytical services.”

Taffy Almeida stated that it was her understanding that the laboratories will identify to the AB whether they want the HASQARD scope added to their audit and that the ABs will charge more to laboratories that request the HASQARD audit scope. Glen Clark stated that as customers of the laboratories, they need to require the laboratories they contract to request the HASQARD portion of the DOECAP-AP. The Secretary added that this could be accomplished through a requirement specified in the SOW to the laboratories.

Glen Clark stated that on a recent DOECAP conference call the subject of a laboratory in Ohio (ALS Ohio) was discussed. This laboratory does not want to request DOECAP-AP accreditation because they only perform IH analyses. It was mentioned that the RJ Lee laboratory in Pasco also does not want to seek DOECAP-AP accreditation because they are only performing IH analyses at this time. Therefore, Hanford Contractors that are using RJ Lee will need to perform a supplier evaluation audit separate from the DOECAP-AP to maintain RJ Lee on the Evaluated Supplier List (ESL).

Rich Weiss stated that it is going to be very interesting to see what kind of information the DOECAP-AP ABs provide regarding the accredited laboratories. Rich used the Washington State Department of Ecology web site as an example. Rich stated that on that web site you can select a laboratory and see the analytes and analytical methods for which a laboratory is accredited. If this is all we will be able to see, it does not provide any information on a laboratory’s compliance to the QSM. One of the Focus Group members added that it was their understanding that the laboratory users in the DOE community will not be able to see the checklists that are completed by the ABs. Another member concurred that this will be the case, the checklists will not be made available. The Secretary added that this raises the issue of how the MSA Acquisition Verification Services (AVS) ESL will read. That is, will DOECAP-AP accreditation mean “automatic” placement on the MSA AVS ESL, or will each laboratory’s entry on the ESL have to be “qualified” to specify those analytes and analytical methods for which DOECAP-AP accreditation has been achieved.

Paula Sellers asked why the MSA AVS organization isn’t auditing the laboratories that the Hanford Contractors use to the HASQARD. The Focus Group members present provided a very brief history behind the Inspector General investigation of the 1990s, development of DOECAP, DOE direction to the contractors to participate in and recognize DOECAP, how HASQARD had been incorporated in the DOECAP audits and how HASQARD is now going to be used by the DOECAP-AP ABs.

Chris Sutton added that we need to emphasize to Steve Clark that a Hanford observer needs to be present on the DOECAP-AP audits at the laboratories used by Hanford contractors. The Secretary accepted the action to contact Steve Clark to request an update and ensure our desire to have observers present is reiterated to him. Rich Weiss added that there will have to be a DOECAP auditor present on the DOECAP-AP audits to cover the QSM module 6 checklists that are outside the scope and abilities of the DOECAP-AP ABs to assess.

Jim Douglas asked if the checklists used by the ABs will be identical to those that are available on the DOECAP website. Rich Weiss said he was not sure about that. Sarah Nagel added that the ABs will use their own checklists. The only individual that will complete the DOECAP checklist will be a member of the laboratory staff.

Paula Sellers asked how we will be assured the laboratory has completed the DOECAP and HASQARD gap checklists. Glen Clark responded that this will be one of the roles of the Hanford contractor that is sent as an observer for the audit. The fact that we can't actually audit, but must act as an observer, could prove to be problematic if things aren't being done as we expect they should.

V. The Chair asked if there was any new business to discuss.

Fred Dunhour mentioned that at the November meeting, members of the group were preparing for the DOECAP-AP train the trainer session and inquired about how the session went. At that session, the HASQARD gap checklist was discussed with the DOECAP-AP ABs. The Secretary stated that there was no feedback, questions or comments regarding the HASQARD gap checklist received from any of the DOE-HQ personnel, DOECAP personnel or DOECAP-AP ABs that were present on the conference call.

Hearing no additional new business, the Chair adjourned the meeting at 3:53 PM.

The next meeting of the HASQARD Focus Group will be at 2:00 PM on March 20, 2018 in Conference Room 223 at 2430 Stevens.