

**HASQARD Focus Group**  
Meeting Minutes  
February 26, 2019

The HASQARD Focus Group Chair, Jonathan Sanwald, was unable to attend this meeting. As a result, the meeting was called to order by Cliff Watkins the HASQARD Focus Group Secretary at 2:03 PM on February 26, 2019 in Conference Room 308 at 2420 Stevens Center Place.

Those attending were: Cliff Watkins - Focus Group Secretary (Corporate Allocation Services, U.S. Department of Energy – Richland Operations Office (RL) Support Contractor), Glen Clark (Washington River Protection Solutions (WRPS)), Jim Douglas (CH2MHILL Plateau Remediation Company (CHPRC)), Anthony Nagel (CHPRC), Matt Perrott (Mission Support Alliance (MSA)), Paula Sellers (Waste Treatment Completion Contractor (WTCC)), Chris Thompson (PNNL), Rich Weiss (MSA), Tricia Wood (Wastren Advantage Inc. Wastren Hanford Laboratory (WHL)).

- I. The Secretary requested review and approval of the meeting minutes from the HASQARD Focus Group held on January 22, 2019. The draft minutes from the meeting were distributed and time was allowed for one final review. Hearing no comments on the draft meeting minutes, the minutes from the January 22, 2019 meeting were approved.
  
- II. Prior to the meeting, the Secretary received a suggestion to include a discussion topic on the agenda regarding the fact that the DOE/DoD Quality System Manual (QSM), Revision 5.2 has eliminated all requirements related to participation in the DOE Mixed Analyte Performance Evaluation Program (MAPEP).

Glen Clark stated that Steve Clark, DOE-HQ, has attempted to explain the basis for elimination of the requirement to participate in the DOE MAPEP proficiency testing (PT) program in a frequently asked questions (FAQ) flyer that he distributed to DOE and Contractor personnel that are interested in the DOE-HQ Analytical Services Program efforts. The FAQ clarifies that PT samples used for accreditation must be certified Analyte-Matrix-Method (AMM) samples. The MAPEP PT samples are not AMM materials. The MAPEP samples are performance-based PT samples. The DOECAP-AP ABs are required by the accreditation to accredit laboratories for specific analytes measured using specific methods. Therefore, only AMM samples can be used to determine acceptable performance by a laboratory. Rich Weiss stated that the main issue with this change is that there may not be AMM PT samples available for some radionuclide analyses. Steve Clark has indicated that the ABs will work with MAPEP as a need for specific radionuclide analysis accreditation is required.

Chris Thompson asked if this change means the MAPEP program could be in jeopardy due to lack of a requirement for its use. Glen Clark stated that MAPEP is not in jeopardy. There are more than 80 laboratories participating in the MAPEP program for one reason or another. Only about 12 of those 80 laboratories are performing MAPEP analyses to satisfy QSM/DOECAP PT program participation requirements. The MAPEP participation can still be required by individual contracts set-up with laboratories. That participation will not be driven by a QSM requirement. Tricia Wood stated that elimination of MAPEP as a requirement is beneficial for her laboratory. To be successful on the MAPEP samples, the 222S laboratory has to modify their procedures from the way they typically handle Hanford samples. This results in a PT sample analysis effort that provides no benefit to the Hanford data user because the results are not produced in a manner relevant to the samples analyzed for Hanford clients. For example, to prepare MAPEP samples in a manner that provides an acceptable result for the MAPEP requires sample preparation using hydrofluoric acid. That reagent is not used with Hanford samples. Jim Douglas added that the QSM Version 5.2 states that a laboratory is to treat PT samples exactly as regular samples are treated (i.e., prepared and analyzed). The MAPEP does not determine acceptable results on a “per method” basis. The MAPEP knows what the total concentration of an analyte is in the matrix provided and expects that result regardless of method used. Therefore, MAPEP is not an appropriate program for determining adequate PT results in compliance with the QSM. Tricia Wood agreed and stated that she prefers for the 222S Laboratory to not be required to analyze MAPEP samples and would rather purchase AMM samples from a commercial vendor (e.g., ERA).

Rich Weiss stated that MAPEP participation is required by a 1994 DOE-HQ (EM) memorandum. In fact, the MAPEP uses that memorandum on their website to drive interest and participation in the program. Rich indicated that the problem with reliance on the QSM requirement for use of an AMM PT sample is that there are no clearly defined “methods” for radiological analyses. There is not a set of EPA method numbers or any viable reference document that one can draw “standard” methods from. As a result, it is not clear what the QSM or DOECAP-AP will define as a “method.”

Tricia Wood concurred stating that at the 222S Laboratory, they state that radiological analyses are conducted in accordance with an internal procedure number for the analysis and others for the sample preparation (when applicable). Rich Weiss concurred that this is the case with all radiological analysis laboratories begging the question to the DOECAP-AP, “what exactly are they accrediting the laboratories to do?”

Jim Douglas asked for more clarification on the context of the issue. Rich Weiss elaborated that if an AMM PT material was available for radiological analysis, would it specify the technique used for both preparation

and analysis? If not, it would not be the definition of an AMM material. That is, would the PT material specify analysis by electroplating deposition followed by counting or is another technique allowed? If the technique is not specified, it is not an AMM material.

Glen Clark mentioned that the problem is similar to issues he has faced with American Industrial Hygiene Association (AIHA) accreditation. The AIHA accredits WRPS's 222-S Laboratory for thermo-desorption unit gas chromatography/mass spectrometry (TDU GC/MS) and passivated canister GC/MS. AIHA accredits WRPS's 222S Laboratory for both TDU and canister analyses based on results of analysis of TDU tube PT samples. Tricia Wood added that this is because the AIHA does not tell the laboratories how they have to prepare the sample.

Returning to the radiological analysis issue raised by Rich Weiss, Glen Clark agreed that this lack of AMM PT materials for radiological analysis needs to be addressed with the DOECAP-AP ABs and the PT providers. Glen added that given the availability of PT materials, a laboratory often uses the material available and modifies the method the AMM was developed for to get accredited for an alternative method or modifies the method for other reasons.

The Focus Group Secretary asked if there is a need to get clarification on the 1994 DOE-HQ memorandum since the MAPEP is being eliminated from the QSM. Several Focus Group members suggested that it would be helpful to know if that policy was still in place.

**Post meeting note:** The HASQARD Focus Group Secretary contacted Steve Clark to ask if the DOE-HQ policy requiring use of MAPEP would be rescinded based on the FAQ the DOECAP-AP has posted regarding the fact that QSM revision 5.2 has eliminated the MAPEP participation requirement. Steve Clark stated that he is in the DOE-HQ Office of the Associate Under Secretary for Environment, Health, Safety and Security (AU) organization and the policy was issued by the DOE-HQ Office of Environmental Management (EM). As a result, Steve has no authority to rescind or modify the policy expressed in an EM memorandum. The Secretary requested a copy of the FAQ so he could formulate an appropriate request for EM to rescind or modify the policy expressed in the 1994 memorandum.

Rich Weiss stated that he could provide a copy of the 1994 memorandum or that it is available on the MAPEP web site. Rich also stated that in October there was a webinar on the revisions being made to the QSM with the issuance of QSM Rev. 5.2. In the webinar, a slide from DoD gave an erroneous impression on the formal agreements between the DOECAP-AP ABs and MAPEP. Steve Clark has informed DOECAP personnel that the material on that slide is not true and that DoD and DOE have agreed to eliminate a MAPEP requirement from the QSM. In the QSM revision 5.2, a laboratory

must show successful PT sample performance for one year before they can be accredited by a DOECAP-AP AB. This can lead to a situation where one year can pass with a laboratory's accreditation status for a specific analyte/method in a given sample matrix being unknown. Glen Clark stated that a laboratory can alleviate this issue by requesting "quick study" PT materials from a PT provider. This is better than MAPEP participation where PT samples are only available once per year.

- III. The HASQARD Focus Group Secretary asked if everyone was aware of the DOE Data Quality Workgroup conference call schedule for February 28. Several Focus Group members had not heard of this call and the Secretary took an action item to forward the meeting notice to the Focus Group membership.
- IV. The HASQARD Focus Group has a standing agenda item to discuss the status of activities associated with the DOE Consolidated Audit Program – Accreditation Program (DOECAP-AP) at all HASQARD Focus Group meetings. This month, the following updates were discussed:

No assessments have been conducted by the DOECAP-AP ABs at laboratories used by Hanford Contractors since the last HASQARD Focus Group meeting in January. Therefore, no new observations from HASQARD Focus Group members assigned to observe the DOECAP-AP ABs were available.

Glen Clark stated that he continues to be concerned about the level of documentation available from the DOECAP-AP ABs. Glen stated two of the ABs provided him copies of the AB assessor's completed checklists, at the laboratory's request, but other AB (ANAB) has not. The ABs have not distributed the completed checklists to any of the laboratories used by WRPS. Glen stated that when he brings this up with Steve Clark, Steve indicates that he is getting push-back from the ABs. Steve will tell Glen that the ABs are accredited to ISO 17043 as accrediting bodies. The ABs feel that this is enough pedigree for the DOE to be able to trust the level of assessment that is done in accrediting the laboratories. Steve Clark tends to agree with this view. Steve Clark will add that he is allowing the DOE Contractors to conduct oversight of the ABs as observers on the assessments. Another concern raised was that the DOECAP observers are not allowed to observe the entire audit process (e.g., pre-audit planning, meetings that may be conducted outside the audited facility) Glen Clark stated that this means that he will make sure that someone from WRPS (or Hanford) is at all of the applicable DOECAP-AP assessments to do oversight of the AB, shadowing the assessors and looking at PT sample results to ensure they are applicable to the WRPS analytical services being ordered. The current system seems to leave a few "unknowns." For example, how do the DOECAP-AP ABs evaluate PT sample results? Glen stated that, for now, completed DOECAP-AP AB checklists will be only intermittently available (i.e., from the laboratories that

receive them from the AB that assessed them). Cliff Watkins asked if there needs to be a conference call on this subject and whether other DOE sites have expressed the same concern. The Focus Group members present stated that it needs to be discussed.

Rich Weiss asked if the announced closure of Test America – Richland (TARL) is an issue for any of the Hanford Contractors. Jim Douglas stated that it is a significant issue for CHPRC. The laboratory closure is mainly an issue because CHPRC sends TARL samples that are frequently collected for two analyses for which the holding time from sample collection until completion of analysis is very short. The two short holding time analyses are hexavalent chromium (24-hour holding time) and anions (specifically nitrate/nitrite/phosphate which has a 48-hour holding time). The current plan is to send the samples collected for anion analyses via overnight carrier to Test America – Colorado. The GEL laboratory in South Carolina will only analyze filtered groundwater samples. If a sample is received unfiltered, GEL will filter it for the customer prior to analysis. Some of CHPRC’s analytical needs are for these tests to be run on unfiltered samples. Therefore, Jim said the current plan is to send the filtered samples to GEL and the unfiltered samples to Test America – St. Louis (TASL). Glen Clark stated that he understood that the Columbia Basin Analytical Laboratory (CBAL) will be accredited by the Washington State Department of Ecology to perform anion analyses within the next week or so. Another Focus Group member asked if WHL could become accredited for hexavalent chromium. Tricia Wood said that’s a possibility but CHPRC would need to work with the laboratory on some of the logistics associated with use of the laboratory. For example, a project must provide funding for the fiscal year’s analytical needs (a practice colloquially referred to as “front loading”). Jim Douglas stated that he believes CHPRC would need to front load the laboratory and, if the entire work load funded is not used, they lose that funding with no benefit. Chris Thompson stated that PNNL can do anion analyses but they are not accredited by Ecology. Chris added that the front-loading issue would likely be present at PNNL.

Rich Weiss stated that closure of the TARL laboratory is a shame but a fact of life. Rich stated that no other laboratory entity has purchased the facility because it is not closing because Test America wants to close it. It is closing because Test America does not own the building and has always leased it from the Port of Benton. The Port of Benton recognizes the value of the land and is allowing the lease to expire so they can repossess the property. Rich stated that he has volunteered to participate in a close-out audit if anyone is coordinating one. Rich stated that he has participated in close-out audits before and can act as a resource for anyone wanting to know what they entail and accomplish. Glen Clark added that he has not heard whether close-out audits will be part of the DOECAP-AP scope or not. Rich stated that the DOECAP-AP, or at least the DOECAP user community should perform a

close-out audit at TARL. The main benefits/focus of the close-out audits are to determine how records are retained/dispositioned. In the case of TARL, Rich knows that half of the Laboratory Information management System (LIMS) is unique to the TARL facility. The other half is connected to the national Test America LIMS. But how the records that are in the unique LIMS will be archived should be of interest to the Hanford clients. Glen Clark added that raw data files from the instruments would be of interest also. Rich Weiss stated that all users of the TARL should request a case file purge from TARL to ensure the raw data files are provided prior to closure of the facility.

V. The status of production of Revision 5 of HASQARD was discussed.

The status of Volume 1 was discussed. At the January meeting of the HASQARD Focus Group it was suggested that Volume 1 was in a final form and ready for Focus Group voting member vote. In early February, the Volume 1 subcommittee received additional comments on Volume 1 some of which were incorporated in the draft. Because this latest revision had not been distributed to the voting members, Volume 1 was not ready for vote/approval at the February Focus Group meeting.

Chris Thompson brought up language in the proposed Volume 1, Section 1.1.2. This section specifies activities outside the scope of HASQARD and includes a bullet that would state:

“Exploratory research. The very nature of exploratory research leaves researchers and scientists with the latitude to use their professional judgment during investigations and studies. Sampling and analysis during the exploratory research process is not constrained or limited by pre-determined QA/QC requirements. However, where HASQARD requirements were not followed, analytical data generated cannot be used for regulatory decision-making purposes.”

Chris Thompson stated that without a definition of what is meant by “regulatory decision-making,” he would disagree with the last sentence in the bullet. This is because some decisions relative to regulations (e.g., CERCLA Treatability Studies) may be made based on results from exploratory research. Chris stated that he would be OK with the intent the bullet (i.e., that exploratory research be excluded from HASQARD) and the language of the bullet if the last sentence in the current wording was removed. Geoff Schramm asked if QA plans are written for exploratory research projects at PNNL. Chris Thompson stated that QA Plans are one of several documents produced or applied to exploratory research projects.

Chris Thompson also suggested that the Atomic Energy Act be added to the

list of inapplicable regulations for which HASQARD is to be implemented.

The Volume 2 subcommittee chair, Geoff Schramm stated that he believes Volume 2 is ready for a vote of approval. The Focus Group Secretary requested a copy of the final electronic version so he could distribute it for final approval/vote or comments that would preclude the vote.

The Volume 3 & 4 subcommittee Chair, Jim Douglas stated that he is working with Glen Clark on Volume 4 and that Volume 3 will require a larger effort than usual because of the reduction of Volume 1. Glen Clark stated that he is going through the DOECAP Module 2 checklists. Glen has discovered that there are a lot of QSM requirements in Module 2 that are not covered by HASQARD. Because the 222S Laboratory is accredited by AIHA, there are requirements in Module 2 that are covered in the 222-S Laboratory's AIHA compliant QA program plans that are not covered in HASQARD. Glen stated that there may be similar impacts on PNNL. As a result, Glen believes the subcommittee may want to add words to Volume 4 to allow flexibility for on-site laboratories to address their specific situations in their QA Program Plans. Tricia Wood added that implementing the QSM at the 222S Laboratory will be onerous but by doing it they will become a better laboratory. Tricia gave examples of needing a revised QAP to meet the QSM requirements, a need to enhance their LIMS integrity and a few other things. Jim Douglas added that the subcommittee wants to be sure they address (and avoid) issues like the temperature monitoring requirements that made HASQARD Revision 4 an unimplementable document at the 222S Laboratory. Glen Clark stated that we can include language in Volume 4 that allows on-site laboratories flexibility to deviate from some requirements with client approval. Tricia added that working with the QSM by itself is difficult. Jim Douglas concurred and said that one must have The NELAC Institute (TNI) standards and ISO 17025 in front of them with the QSM to appreciate the entire set of requirements being invoked by the QSM.

VI. Cliff Watkins asked if there was any new business to be discussed.

Hearing no new business, Cliff Watkins adjourned the meeting at 3:32 PM.

The next meeting of the HASQARD Focus Group will be at 2:00 PM on March 19, 2019 in Conference Room 308 at 2420 Stevens Center Place.