

**HASQARD Focus Group**  
Meeting Minutes  
April 17, 2019

The meeting was called to order by Jonathan Sanwald the HASQARD Focus Group Chair at 2:00 PM on April 17, 2019 in Conference Room 199 at 2430 Stevens Center Place.

Those attending were: Jonathan Sanwald – Focus Group Chair (Mission Support Alliance (MSA)), Cliff Watkins - Focus Group Secretary (Corporate Allocation Services, U.S. Department of Energy – Richland Operations Office (RL) Support Contractor), Samuel Adams (Battelle Memorial Institute – Pacific Northwest National Laboratory (PNNL)), Glen Clark (Washington River Protection Solutions (WRPS)), Jim Douglas (CH2MHILL Plateau Remediation Company (CHPRC)), Scot Fitzgerald (CHPRC), Anthony Nagel (CHPRC), Sarah Nagel (MSA), Karl Pool (PNNL), Walter Scott (U.S. Department of Energy – Office of River Protection), Chris Thompson (PNNL).

- I. The Chair requested review and approval of the meeting minutes from the HASQARD Focus Group held on March 19, 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 March 19, 2019 meeting were approved.
  
- II. The Chair announced that he has submitted his resignation from his position with MSA and will be moving to Oak Ridge before the next meeting. The Chair indicated that the MSA QA Manager has nominated Sarah Nagel for the position of Focus Group Chair. There was no objection to this nomination voiced at the meeting by the Focus Group members present. The attendance at the meeting did not include all of the Focus Group voting members. As a result, a formal vote on the nomination could not take place at the meeting. The Secretary took the action to review the Focus Group Charter and determine the steps required to ensure the nomination and placement of the new Chair is documented appropriately.
  
- III. 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:

The assessment that was originally scheduled to occur in April at GEL in Charleston, SC has been postponed and may not occur until July.

Jim Douglas stated that on April 16, Steve Clark (DOE-HQ, AU Analytical Services Program (ASP) Manager) sent email to the DOECAP-AP working group to inform them that the assessment at Test America – Denver will occur

April 29-May 3. This is approximately two months earlier than the original 2019 scheduled date for the Test America – Denver assessment. Jim said that only two DOE observers are planning to attend. The two observers will be Jim Douglas and Steve Clark.

Glen Clark added that the issue of inadequate forewarning on scheduled assessments continues to be an issue for the DOECAP-AP. Glen said this issue has been brought up with Steve Clark before but is difficult for Steve to control because the Accrediting Bodies (ABs) have a business to run and schedule adjustments are constant in their business.

Sarah Nagel stated that the DOECAP-AP is at the mercy of the AB's schedules. Sarah said that when she was working at a commercial laboratory, the ABs had a policy of trying to inform the laboratory 30 days prior to an upcoming assessment but stating that they would never send such notice with less than two weeks remaining until the on-site assessment date.

Glen Clark stated that the amount of forewarning on assessment dates in 2019 is consistent with what the ABs were doing in 2018. Scot Fitzgerald agreed saying that he had about two weeks' notice for the Test America – Denver assessment in 2018.

Sarah Nagel added that the DOE Data Quality Workgroup (DQW) had released two frequently asked questions (FAQs) recently for which they were soliciting responses from the DOE analytical services community. One of the two FAQs was on the frequency requirements for QC check sample analysis and the other was related to the new flashpoint method proposed for publication in SW-846. Jim Douglas added that EPA has distributed the new flashpoint method for review and comment.

It was mentioned that there will be some DOECAP training webinars coming up in June.

Glen Clark stated that Steve Clark is very committed to having DOE contractor personnel observe, or more accurately conduct oversight on, the ABs as they conduct the DOECAP-AP assessments. The DOE ASP's interest is to ensure the ABs are following the program, looking at proficiency testing scores at the laboratories assessed, etc.

Jonathan Sanwald stated that the issue seems to be with the consistency with which different ABs apply the process. Glen Clark stated that it has been a problem to be able to see the AB assessors' completed checklists. Karl Pool asked if we need to draft a formal concern regarding the issues we are noticing. Glen Clark stated that he did not believe we should be that alarmed at the present. He believes that we don't really have a problem with the DOECAP-AP, we are just frustrated with the level of documentation we as

DOE observers are allowed access to. Glen continued by saying that this emphasizes the need to ensure Hanford observers are available to go to the applicable DOECAP-AP assessments to ensure the ABs are looking at the correct analytes and methods. For example, when Robert Elkins went to observe the DOECAP-AP gap assessment at Eurofins, the AB assessor was assessing them for methyl mercury analysis when WRPS uses that laboratory for dimethyl mercury analysis. The Hanford observers need to assure that the assessors are assessing the analytes and methods the laboratory uses for Hanford clients.

Jim Douglas said that the observers that have been present to represent Hanford so far have had more of a concern about the system (e.g., forewarning on schedule, ensuring proper analytes and methods are assessed) than on the technical ability of the assessors. Except for one AB's assessment where Jim did not feel the assessor did a credible job, the other assessors seemed to be very capable. Glen Clark concurred with Jim's opinion and said that the issue with the assessor Jim mentioned was documented on an observer evaluation form and Steve Clark reported that this issue is being addressed.

Chris Thompson asked if we have heard any feedback of dissatisfaction from other DOE sites. None of the Focus Group members present had talked to anyone from other DOE sites regarding their opinion on DOECAP-AP effectiveness/credibility. Jonathan Sanwald mentioned that he had seen a note from Heather Medley to other sites concerning hexavalent chromium analysis needs, but had not seen any multi-site correspondence on the subject of the DOECAP-AP. Scot Fitzgerald added that he has been on two DOECAP-AP assessments and has not seen any site represented as observers other than Hanford. Chris Thompson asked if any of the other sites have spoken up on any of the DOECAP conference calls expressing concerns. Glen Clark said there have been no concerns on the lack of documentation or detail of documentation available to observers. There have been issues raised on conference calls regarding the number of observers planning to attend the GEL assessment. The DOECAP-AP AB is asking if some of the DOE observers can drop out of that assessment. Because GEL is a laboratory WRPS uses extensively, they are not inclined to voluntarily drop out. Glen said he has raised the issue of insufficient documentation before and a representative from Oak Ridge has echoed that concern.

Jim Douglas stated that Scot Fitzgerald felt he was not seeing enough objective evidence cited in reports as a basis for conclusions made in the reports. Jim added a concern that without enough reference to objective evidence reviewed, it would be difficult for the site to defend the assessment as being technically sound if necessary. Glen Clark stated that Steve Clark has repeatedly stated that he wants DOE sites to observe the DOECAP-AP assessments and give him feedback on where the program can be improved. The ABs all meet ISO 17011 standards in carrying out their role as ABs.

Therefore, Glen suggested that Jim Douglas should send an email to Steve Clark expressing his specific concerns.

Anthony Nagel recalled that when the DOECAP-AP was first being discussed, the idea of DOE Observers was only supposed to last for a year or two. Anthony asked if the observer role would be forced to come to an end after this year. Glen Clark said no, the opportunity for DOE personnel to attend as observers will continue indefinitely. The DOECAP-AP started as a Department of Defense (DoD) accreditation program several years ago and they have always been allowed to participate as observers (although very few do anymore).

Karl Pool asked if there was an impression that we (Hanford and its contractors) risk losing credibility with the stakeholders. Scot Fitzgerald stated that he had a conversation with Steve Clark and Noe'l Smith-Jackson regarding what CHPRC's requirements are regarding using accredited laboratories. The State of Washington Department of Ecology (Ecology) has very little interest in whether a laboratory has been accredited by the DOECAP-AP. What matters to the State of Washington is whether the laboratory has been accredited by the State's program. Steve Clark told Scot the DOE-HQ has no policy in place requiring use of DOECAP-AP accredited laboratories. Glen Clark added that he talked with Ms. Wood at the Ecology laboratory regarding the possibility of recognizing DOECAP-AP accreditation as Washington State accreditation through reciprocity. Ms. Wood told Glen there is a possibility that could be done.

Readdressing the issue of whether the DOECAP-AP is not meeting Hanford's needs, Jonathan Sanwald stated that we could raise the issue through formal communication if necessary. Jim Douglas stated that he would not want to do that unless a situation was egregious. That is, the observations he has had on some of the assessments has been discouraging but not indicative that the DOECAP-AP is totally broken. Glen Clark stated that if an assessment was really poor, Hanford personnel could stay longer or go back to fill in areas not acceptably addressed in the assessment. For example, Glen said he stayed an extra day when the DOECAP-AP did a DOE gap assessment at ALS-Salt Lake City to discuss specific contractual issues/requirements. Jim Douglas concurred saying he was hoping to spend some extra time in Denver after the Test America Denver DOECAP-AP assessment to do the same thing. Glen added that the ABs have not had any issue with the Hanford observers talking specific contractual issues with laboratory personnel during assessments also. They just want to know that's what the observer is talking to the laboratory about and they have no issues with it.

Karl Pool asked, philosophically speaking, at what point in the evolution of the DOECAP-AP do we anticipate the ABs saying, "Hanford, please stop sending observers." Glen Clark stated that DoD has had an accreditation

program, based on the QSM, in place since 2009 and still send observers occasionally. Because of this, Glen believes that DOE observers will always be able to observe DOECAP-AP assessments. Chris Thompson agreed saying everything he has heard from Steve Clark indicates he wants to work with us and keep the sites' needs met. Scot Fitzgerald agreed adding that in conversations he has had with Steve Clark, it is clear that Steve appreciates the value of feedback from people that are at the assessments observing.

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

The status of Volume 1 was discussed. The Chair of the Volume 1 subcommittee, Paula Sellers, was not present at the meeting. Glen Clark stated that he had forwarded a comment/question to Paula regarding the glossary asking why some terms have been removed. Glen stated that he had not received a reply from Paula on that as of the date/time of the Focus Group meeting. Other than the question Glen has, the thinking of the Volume 1 working group is that the Volume is completed and ready except for some edits that may be discovered as being necessary as Volumes 2, 3 and 4 are finalized.

Jonathan Sanwald asked about the progress on Volume 4.

Glen Clark stated that Tricia Wood has provided Glen with a list of implementation issues the 222-S laboratory would have if the QSM is used to specify all requirements that are not specified in HASQARD. Jonathan Sanwald stated that many of these issues may be common to any on-site laboratory and asked if the list could be shared with PNNL. Glen agreed to send the list to Karl Pool, Sam Adams and Chris Thompson.

Glen continued by saying that Tricia's comments have resulted in Glen wanting to revise Volume 4 to include specific exemptions from the QSM that can be afforded to the on-site laboratories. Tricia's comments included some things that the 222-S laboratory could do if provided funding, but are not currently in place (e.g., Laboratory information Management Systems (LIMS) upgrades). The comments provided by the 222-S laboratory result in Glen wanting to have Volume 4 state that some exemptions to requirements could be eliminated as exemptions if the funding to support the QSM requirements is provided while other requirements needing exemptions are never expected to be implemented. In asking about how long it would take the 222-S Laboratory to implement the QSM requirements with needed exemptions, Tricia told Glen an estimate of anywhere from 12-18 months. The approach Glen is proposing for revising Volume 4 is to generically mention an area where an exemption is/may be required and state that the individual laboratory's QA program and/or procedures need to address the exemption in detail. Cliff Watkins stated that it is sounding like Volume 4 would become more of instruction for on-site laboratories since off-site/commercial

laboratories will be under the QSM. Glen Clark agreed that this is becoming the vision for Volume 4.

Anthony Nagel mentioned that he had provided the Volume 4 subcommittee with some comments and wondered if they had been addressed. For example, Anthony has suggested that while data validation should be addressed in HASQARD, it is not a laboratory function and therefore should not be mentioned in Volume 4. Anthony stated that the laboratories do need to provide data validation ready data so that concept should be in HASQARD. Glen Clark concurred and asked if data validation and the data package content required to support it should be in Volume 1 or in a Statement of Work (SOW) provided to the laboratory for obtaining services. Scot Fitzgerald expressed the opinion that the general concepts of data validation should be retained in Volume 1. Glen Clark asked if any of the Focus Group members had time to take the language found in Volume 4, revise it and suggest a spot for it in Volume 1. Scot Fitzgerald stated that he would provide this input for Volume 1 and asked Anthony Nagel to review his proposed revision.

Glen Clark stated that there is a lot of language in the QSM that has to do with the accreditation program itself. Because the on-site laboratories will not want to/need to be accredited by the DOECAP-AP, Glen is assuming exemptions regarding the QSM language specific to the accreditation program will be necessary.

Scot Fitzgerald agreed that the on-site laboratories will likely never be DOECAP-AP accredited and said the on-site laboratories used to be audited by the inter-contractor audit team (ICAT) and asked if this was still happening. Glen Clark said the ICAT audits are not happening and mainly because it has become a funding issue. That is, the thinking at WRPS has been that if WRPS has a need to audit and approve the 222-S laboratory as a supplier, they will not pay other contractors on-site to audit the laboratory with them. That is, it is the responsibility of WRPS personnel only to audit the laboratory. One Focus Group member stated that it has been since June 2016 since the last ICAP audit was conducted at the 222-S laboratory. Sarah asked if there is any interest in resurrecting the ICAT audit teams to conduct an audit at 222-S and/or PNNL when necessary. Anthony Nagel suggested that these audits could become a HASQARD Focus Group function with a subcommittee formed to be the auditing entity. That way, the audit team could charge the same charge account as they charge to attend HASQARD meetings to do the audits. Glen Clark asked the hypothetical question of who will pay MSA AVS to audit the 222-S laboratory in order to include them on the ESL as an approved supplier. Jonathan Sanwald stated that the company position at MSA has become that the on-site laboratories have a DOE-approved QA program and therefore need not be audited as a supplier to be placed on the ESL. Jonathan then asked who it was that audited

PNNL to the HASQARD requirements recently. Chris Thompson said that CHPRC came and did an audit at the PNNL laboratories about two years ago.

Cliff Watkins stated that he assumed no progress has been made on the revision to HASQARD Volume 3.

Jim Douglas concurred with this and added that he can start working on it now that other work priorities seem to have abated. However, because he needs to prepare for to observe the upcoming DOECAP-AP assessment at Test America – Denver, it is likely that no progress will be made on revising Volume 3 before the May HASQARD Focus Group meeting.

V. Jonathan Sanwald asked if there was any new business to be discussed.

Karl Pool asked if any written concurrence with the DOE-HQ Environmental Management (EM) position on their verbally stated opinion no policy or direction requiring participation in the DOE Mixed Analyte Performance Evaluation Program (MAPEP) currently exists. Cliff Watkins reported that a draft email was prepared for, and provided to, the RL QA Team Lead. The intent of this email was to transmit it to EM personnel requesting that clarification on the lack of a MAPEP policy be stated in the form of a response to the email. As of the Focus Group meeting, the email had not been transmitted to EM.

Hearing no additional new business, Jonathan Sanwald adjourned the meeting at 3:22 PM.

The next meeting of the HASQARD Focus Group will be at 2:00 PM on Wednesday May 15, 2019 in Conference Room 199 at 2430 Stevens Center Place.