

HASQARD Focus Group
Meeting Minutes
June 19, 2019

The meeting was called to order by Sarah Nagel the HASQARD Focus Group Chair at 2:04 PM on June 19, 2019 in Conference Room 199 at 2430 Stevens Center Place.

Those attending were: Sarah Nagel – 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)), Heather Medley (CHPRC), Anthony Nagel (CHPRC), Karl Pool (PNNL), Geoff Schramm (WRPS), Noe’l Smith-Jackson (Washington State Department of Ecology), Chris Thompson (PNNL), Tricia Wood (Wastren Hanford Laboratory (WHL)).

- I. The Chair requested review and approval of the meeting minutes from the HASQARD Focus Group held on May 22, 2019. The draft minutes from the meeting were distributed and time was allowed for one final review. One comment was received and incorporated prior to a motion for approval of them minutes being heard. Hearing no objections to the motion and no additional comments on the draft meeting minutes, the minutes from the May 22, 2019 meeting were approved.

- II. 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:

At the DOECAP-AP assessment recently conducted at the Test America – Arvada facility in Arvada, Colorado; Jim Douglas attended as an observer. During the assessment, one of the accrediting body (AB) assessors from the American Association for Laboratory Accreditation (A2LA) asked Jim for an interpretation of the HASQARD gap checklist. Of specific interest was how the HASQARD requirement could be acceptably met. The specific HASQARD checklist item from QSM 5.2, Appendix E is identified as line of inquiry (LOI) 2.9. This LOI is traceable to requirements in HASQARD Rev. 4, Volume 4, Section 5.1 and states: “The following information shall be traceable to the raw data output:” followed by a list of bullets identifying the required information. The seventh bullet in the list is: “procedure number including revision number.” The question from the AB assessor was whether this requirement could be met by listing an EPA method number (including revision if applicable) or is the expectation that the laboratory have a separate laboratory procedure that implements the method? Jim’s interpretation to the

assessor was discussed, and documented in the minutes, at the HASQARD Focus Group meeting held on May 22, 2019. At this meeting, the work to prepare a response agreeable to all of the Focus Group members was discussed, refined and agreed to. The Focus Group Secretary took the action to forward the response to the DOE-HQ Analytical Services Program (ASP) Manager, Steve Clark, so it could be posted with other responses on the ASP's DOECAP-AP website. The response to be sent to the ASP manager reads:

“This FAQ response is to provide clarification for the HASQARD checklist item found in the *DoD/DOE Consolidated Quality System Manual for Environmental Laboratories* (QSM) Version 5.2, Appendix E, line of inquiry (LOI) 2.9. The LOI is traceable to requirements found in the *Hanford Analytical Services Quality Assurance Requirements Document* (HASQARD), Revision 4, Volume 4, Section 5.1 which states “The following information shall be traceable to the raw data output:” followed by a list of bullets identifying the required information. The seventh bullet in the list is “procedure number including revision number.” This clarification results from an Accrediting Body assessor’s question: “Is this requirement met by listing an EPA method number (including revision if applicable) or must the laboratory cite its laboratory procedure number and revision number?”

Response: The intent of HASQARD Rev. 4, Volume 4, Section 5.1, is to require that raw data is traceable to the actual analytical steps (procedure) under which the raw data were collected. To meet the requirement, a traceable procedure shall be one of the following in this order of preference:

1. A unique laboratory procedure number/revision number controlled under the laboratory’s document control system, or
2. A published method identifier (including revision number if applicable) if the laboratory uses a published standard method *as is* with no additional laboratory-specific procedure step changes or revisions.

If a laboratory employs laboratory-specific procedure step changes or revisions, a unique laboratory procedure number/revision number, controlled under the laboratory’s document control system, must be used. In either of the two cases listed above, the laboratory must maintain recoverable copies of the procedures used for the same period of retention as the associated raw data.”

The Focus Group discussed observations made at the only DOECAP-AP assessment at a laboratory subcontracted by Hanford contractors since the last Focus Group meeting. This assessment was conducted by the American Association for Laboratory Accreditation (A2LA) at the GEL laboratory in Charleston, SC. Glen Clark reported that Judy McCluskey from WRPS attended this audit as an observer. Judy has stated that the assessment was very thorough. The two assessors A2LA sent to conduct the assessment arrived Monday morning and did not close out until Friday afternoon. Judy

told Glen that her impressions of the assessors was that they were very competent and did a good job. Cliff Watkins asked whether the AB assessors were completing an assessment checklist. Glen Clark said the Judy said she observed the assessors completing checklists. Noe'l Smith-Jackson commented that the reviews from observers at DOECAP-AP assessments being conducted by A2LA have been mostly positive and asked if A2LA is the best of the ABs. Jim Douglas stated that A2LA has been the best of the ABs he has observed.

Sarah Nagel asked about the schedule for Hanford observation at upcoming DOECAP-AP assessments. Glen Clark stated that he is scheduled to go observe the DOECAP-AP assessment at Eurofins when they move to a new facility in Fife, WA. Heather Medley mentioned that the close-out assessment is due to be completed at Test America-Richland (TARL). The TARL facility is closed and Test America is clearing out the facility prior to demolition and return of the property for Port of Benton use. Glen Clark asked if this assessment would be done as a DOECAP audit or a DOECAP-AP assessment. Heather Medley said she did not know for sure noting that this audit was still on the DOECAP schedule. Sarah Nagel stated that discussions with Rich Weiss have indicated this close-out activity will be done as a DOECAP audit. Heather Medley recalled that the DOECAP audit schedule indicated that the TARL close-out would be conducted in August. Sarah Nagel said that she had heard that the Port of Benton wants the building to be leveled by the end of the calendar year. Sarah stated that this schedule would be aggressive. Sarah stated she will reach out to Steve Clark to ask if DOECAP will be doing the close-out at TARL. Heather Medley added that it would make sense because DOECAP did the close out at the Eberline laboratory when it was shut down. Glen Clark stated that he has heard that Rich Weiss has volunteered to be on the TARL close-out audit team.

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

Glen Clark initiated this discussion by saying that Volume 1 is on hold pending Volumes 2-4 being closer to final.

Geoff Schramm reported that Volume 2 is done and waiting for final Focus Group review. The Focus Group review for all volumes will need to occur at the same time due to the major revision to Volume 1.

Jim Douglas reported that he has made significant progress working on Volume 3. Jim stated that he had hoped to be done with his proposed revisions to Volume 3 by this meeting but ran into some questions on direction to proceed that he wanted to clear with the Focus Group before finishing the work. Because Revision 5 of HASQARD will have many requirements deleted from Volume 1 and 4 because the QSM will be referenced as the source for these requirements, Jim found Volume 3 growing

in size to be the stand alone source of the requirements addressed in Volumes 1 or 4 of Revision 4 of HASQARD. As a result, Jim wanted to get input from the Focus Group on how many of the requirements from Revision 4 HASQARD Volumes 1 and 4 should be included in Revision 5 of Volume 3 versus relying on the contractor's existing programs for subjects like personnel training and qualification. The work Jim has done to date was displayed and the Focus Group discussed the sections presented.

From the beginning of the document, Jim has revised the term "fixed laboratory" or "laboratory" to "fixed-site laboratory" to differentiate between permanently located laboratory facilities and locations where field analyses are performed. There was no disagreement to this term heard from Focus Group members.

Jim has introduced the term "field organization" to define the organization to whom the Volume 3 requirements would apply.

Revision 4 of Volume 3 includes a discussion of Data Quality Objectives (DQOs). Because the DQOs are not the responsibility of the laboratory or field organization, Jim suggests deleting this material from Volume 3. The Focus Group members present voiced agreement.

The revision being displayed showed that the introduction section included a sentence stating, "It does not cover the use of these techniques in support of the Radiation Control Program or Industrial Hygiene Program." The Focus Group agreed that this sentence could be deleted because that scope statement is covered in Volume 1.

Jim stated that some of the requirements stated in the introduction seem better placed elsewhere in the document and that he plans to move them.

One requirement found in Volume 3, Revision 4, Section 1.2, "Field Screening/Process Monitoring" states, "The following are general requirements for using field instruments to support field screening and process monitoring...3. The chance of false positives and false negatives shall be known." Jim stated that he was not exactly sure what that meant or how a field organization would determine this with any kind of quantitative or statistical certainty. Chris Thompson said that this statement is vague and not useful. Jim suggested replacing this entire statement (requirement) with a statement related to MDL and no objection to that was heard from the Focus Group members present.

Jim then discussed a new Section 2 that he has introduced to the Volume titled "Organization and Responsibility" because details on these requirements have been lost in the revisions planned for Volume 1. Jim stated that he will look to reference Volume 1 and defer many requirements to the company QA Plans

that govern general QA requirements such as training and qualification. Glen Clark agreed saying that the material in Volume 3 should stick to requirements specific to field analyses and let company QA programs or specific sampling and analysis plans (SAPs) be the source of other requirements. Anthony Nagel asked about the applicability of the documents that the CHPRC Sample Management and Reporting organization sends out such as groundwater or field sampling reports. Jim said he would evaluate including details on customer sampling and analysis requests in Volume 3.

Noel Smith-Jackson stated a concern that many SAPs currently reference HASQARD as a source of analytical requirements and have for a long time. The concern being that if requirements are referenced to other places, Ecology won't know the requirements under which the data were collected. The Focus Group agreed that this revision of HASQARD may result in some changes in the way SAPs address analytical services requirements. Glen Clark stated that when HASQARD Revision 5 is issued, the projects will need to be informed of the changes and write their documents accordingly. Noel said this may lead to more work for the authors. The Focus Group agreed but since the intent is to not have any requirements deleted, rather analytical requirements will now be referenced as being derived from the DoD/DOE QSM, a reference to HASQARD will still be a sufficient reference in SAPs. Geoff Schramm stated that while it will be different than it is now, it will be better and more clear on exactly what is being done. Other Focus Group members stated that because the effective date for Revision 5 will be known, data users will always be able to determine the revision under which a specific project was planned and executed.

Jim Douglas stated that he had received good comments and direction on how to proceed with revising Volume 3 and would continue based on this input.

The status of the revision to Volume 4 was discussed. Glen Clark said he continues working on how to apply Volume 4 to the on-site laboratories (222-S and PNNL). Because Volume 4 will defer to the QSM for the base requirements, there are several exemptions that will be required for the on-site laboratories. Glen recalled to the Focus Group that there are three primary categories of exemptions required. The first are those that could be addressed by procedural revisions and training personnel to the new procedures. The second category of exemptions are related to QSM requirements that could be met with an increase in resources and contract direction from DOE to complete facility upgrades. Largest in this category would be to fund an upgrade to the cold storage temperature monitoring system to allow 24-hour temperature excursion notification and an improved laboratory information management system (LIMS) that would allow the data integrity standards specified in the QSM to be met. The temperature monitoring system upgrade would require boring through thick concrete walls to install cabling to send the temperature monitoring signal outside the cold storage units. The

representatives from PNNL asked if a WiFi solution would work for this. Glen stated that he did not believe WiFi could penetrate the thickness of the wall. The PNNL representatives stated that they believe that perhaps there is a WiFi technology that would work. The third category of exemption the 222S laboratory will need from the QSM requirements is related to requirements that can never be met due to health and safety concerns raised by handling highly radioactive samples. Glen has been developing a table to specify all of the exemptions for 222-S Laboratory by category. Samuel Adams stated that he has been looking at Volume 4 and QSM from the same perspective to determine the QSM requirements that PNNL would also request exemption from. Sam said that he is approximately 25% complete with that effort.

Glen Clark stated that he is considering including a statement in Volume 4 concerning the exemptions required by the on-site laboratories. Some of these exemptions will always be required (due to the radioactive nature of the samples) and others will be granted based on DOE approval specifying those that could be met with facility upgrades (i.e., resources and contractual direction). Glen is also planning to provide a list of these known exemptions to DOE for consideration. Karl Pool suggested the list include an implementation plan for those that could be addressed with additional resources (e.g., a cost estimate and proposed schedule). Glen Clark agreed and stated that initial estimates for the temperature monitoring upgrade was \$500K. Glen stated that the other option for addressing this QSM requirement would be to state what the 222-S Laboratory does as an alternative to meeting the requirement. That is, a temperature wheel records the temperature all weekend and is observed Monday morning. If a temperature excursion has occurred, the customer is notified and asked how they want to proceed (e.g. continue with analysis, resample). In the past, the customer has always asked that the samples be analyzed regardless of the sample temperature excursion issue. Geoff Schramm stated that perhaps language indicating exceptions will be implemented using a graded approach. Glen stated that he will likely state a requirement in Volume 4 that exemptions from Volume 4 (QSM) requirements will be specified in laboratory QA Plans. Tricia Wood echoed the concern saying that serious thought needs to be given to requirements and how they can/cannot be met.

IV. Sarah Nagel asked if there was any new business to be discussed.

Glen Clark mentioned that the scheduled date for the next HASQARD Focus Group meeting (July 17) is the same week as the DOE-HQ ASP workshop in Denver. Glen will be attending the workshop, but if the HASQARD Focus group meeting is deferred to July 24 he would not be able to report on observations made/conversations held at the workshop because he will be out of the office the week that includes July 24 also. The Focus Group Secretary asked if any other Focus Group members were planning to attend the ASP workshop. Samuel Adams stated that he was planning to attend. Heather

Medley stated that one of her employees will be attending also. The Secretary said he would take all of this information into account in determining if the next HASQARD Focus Group meeting should be rescheduled.

Sarah Nagel had to leave the Focus Group meeting early due to a high priority conflict. Therefore, hearing no additional new business, Cliff Watkins adjourned the meeting at 2:52 PM.

The next meeting of the HASQARD Focus Group was announced as being scheduled for 2:00 PM on Wednesday July 17, 2019 in Conference Room 199 at 2430 Stevens Center Place.