

**HASQARD Focus Group**  
Meeting Minutes  
September 18, 2019

The meeting was called to order by Cliff Watkins the HASQARD Focus Group Secretary at 2:00 PM on September 18, 2019 in Conference Room 199 at 2430 Stevens Center Place. The HASQARD Focus Group Chair, Sarah Nagel had competing obligations and was unable to attend this month's meeting.

Those attending were: 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)), Erika Cutsforth (CH2MHILL Plateau Remediation Company (CHPRC)), Jim Douglas (CHPRC), Heather Medley (CHPRC), Walter Scott (U.S. Department of Energy – Office of River Protection (ORP)), Rich Weiss (Mission Support Alliance (MSA)).

- I. The Secretary requested review and approval of the meeting minutes from the HASQARD Focus Group held on August 21, 2019. The draft minutes were distributed and time was allowed for one final review. Hearing no additional comments and no objections to approval, the minutes from the August 21, 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:
  - A. There were no DOECAP-AP assessments in August that Hanford contractor personnel observed. Glen Clark stated that on September 9-10, the DOECAP-AP accrediting body (AB) Perry Johnson Laboratory Accreditation, Inc. (PJLA) conducted a DOECAP-AP assessment at the ALS Environmental laboratory in Salt Lake City. Glen stated that while the AB did a good job of assessing the laboratory, the Hanford observer returned with some concerns about the quality of services being rendered by the laboratory as a result of the assessment. The Hanford observer for this assessment was Robert Elkins. Therefore, Glen qualified his statements as being what he recalls from conversations he has had with Robert regarding the assessment. Glen stated that ALS is accredited by AIHA and the AIHA requirements have been relaxed in recent years. Glen said that it is a good thing that the DOECAP-AP is accrediting laboratories to the *DoD/DOE Consolidated Quality System Manual for Analytical Services (QSM)* because that document contains more specific requirements for laboratory quality assurance (QA). At the ALS assessment, the AB assessor wanted to look into a specific method and Robert Elkins suggested he look at hexavalent chromium because that was an analyte that WRPS frequently requests ALS to test samples

for. The ALS personnel stated that they analyze for hexavalent chromium using high performance liquid chromatography (HPLC). The method used by ALS is the Occupational Safety and Health Administration (OSHA) method ID 215. The OSHA ID 215 method is a ion chromatography method that ALS has adapted to be done using HPLC. The PJLA assessor asked the analyst for a chromatogram for a continuing calibration verification (CCV) analysis. The assessor asked how the retention time windows are established for the analytes of interest. This question was asked because the assessor noticed that the peak for the analyte of interest was not completely integrated. The chromatogram showed that the edges of the peak were not included in the integration of the peak. After observing this, the assessor asked what method was being used and was told the method was OSHA ID 215. Because ALS uses OSHA ID 215 as their standard operating procedure, the assessor asked if ALS runs the method exactly as stated in the published method. The analyst produced an operator aid that was not a controlled document that provided instructions on performing the method. The assessor asked if there was a formal procedure for calibrating the GC methods and was told there was not one. The lack of controlled operator aids will result in findings associated with this assessment at ALS. It is to be determined how many findings the assessor will have. Glen Clark discussed some of the details regarding why the ALS laboratory, an American Industrial Hygiene Association (AIHA) accredited laboratory, may be starting to show some of the quality issues identified by the DOECAP-AP assessment. Glen said that when the International Standards Organization (ISO) issued the 2017 revision to the document ISO-17025, *General Requirements for the Competence of Testing and Calibration Laboratories*, they relaxed some of the requirements. For example, previous revisions of this standard required an analyst to demonstrate competence with an analytical method once every six months. That requirement was removed from ISO 17025 in 2017. When ISO relaxed requirements in ISO 17025, the AIHA relaxed requirements also. The requirements for an analyst to demonstrate competence with an analytical method once every six months has been removed. The National Environmental Laboratory Accreditation Conference (NELAC) Institute (TNI) requirements are for an analyst to demonstrate competency with a method once every 12-months. It is not known if the ALS analysts comply with the TNI requirement. Glen said this shows the value of the DOECAP-AP and QSM. If there was no DOECAP-AP assessment and WRPS relied only on AIHA accreditation, the issues identified with the analyst's performance on OSHA Method ID 215, lack of controlled work instructions, etc. would not have been identified. As a result of the concerns raised by the assessor and observed by the WRPS observer at this assessment, WRPS is conducting additional reviews of data packages received for hexavalent chromium analysis from ALS Salt Lake City to see if they indicate issues. Robert Elkins told Glen that he felt the assessors were very good, did a good job assessing the laboratory given the amount of time allotted, but that the two days allotted turned out to be not enough time. More time was necessary given the number of issues encountered and the less than cooperative posture encountered with the laboratory personnel. Glen said that Robert's bottom line was that Robert was happy with the assessors and

not happy with the laboratory.

Cliff Watkins asked if there were any other DOECAP or DOECAP-AP assessment activities involving HASQARD Focus Group members since the last meeting of the Focus Group. No other assessments have occurred in that time frame.

- B. Cliff Watkins asked about the upcoming schedule for DOECAP-AP assessments. Glen Clark stated that he is still scheduled to observe the Eurofins assessment scheduled at the new facility in Fife, WA. That assessment is scheduled for October 16-18, 2019. The Eurofins facility in Fife is an existing Test America environmental laboratory and much of the equipment being installed there is moving from the facility closing in Bothell, WA. The DOECAP-AP assessment will be a full assessment this year. This assessment will be conducted by the DOECAP-AP AB PJLA.

Heather Medley stated that Scot Fitzgerald is scheduled to observe the DOECAP-AP assessment at the Test America laboratory in St. Louis in December. Heather also stated that one of the DOECAP-AP ABs is supposed to conduct a desk top evaluation of the ALS laboratory located in Ft. Collins, Colorado but the schedule for that is not clear.

- C. The recent activities associated with the DOE Data Quality Workgroup (the DOE advisory group to the committee responsible for the *DoD/DOE Consolidated Quality System Manual for Analytical Services* (QSM)) were discussed.

Prior to the HASQARD Focus Group meeting held on August 21, Glen Clark provided the Focus Group with a copy of a table containing the QSM Appendix E, HASQARD Gap Checklist, showing columns to show the HASQARD Checklist Item Number, Proposed Location for the requirements in QSM Rev. 5.3, proposed wording of the QSM if the HASQARD requirement is accepted, the HASQARD Line of Inquiry, the source of the requirement in HASQARD, the source of the requirement from other QA references and a discussion/recommendation. At the August meeting, the Focus Group had concurred with Glen's recommendations on all but three of the items. As detailed in the minutes of the August 21 Focus Group meeting, Rich Weiss had accepted the action to research the three items (QSM Appendix E items number 2.3, 2.4 and 5.2) and provide the group with a recommendation at the September Focus Group meeting. Prior to the September meeting, Rich provided the Secretary with his recommendations which were printed and provided to the Focus Group members assembled to review. Rich's written recommendations on all three items were that they were no longer relevant and/or required given the requirements already present in the QSM. The Focus Group members concurred and Glen Clark took the action to finalize the language that will be presented to the DQW in suggesting the HASQARD requirements be included in the text of Revision 6 of the QSM and Appendix E be deleted from that revision. After the

language is finalized, the HASQARD Focus Group Secretary will communicate with the DOE-HQ Analytical Services Program (ASP) manager and forward the request to him for subsequent DQW consideration.

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

- A. The status of Revision 5 to Volume 1 is that it is waiting for Volume 3 and 4 to be finalized prior to being able to complete the revision.
- B. The status of Revision 5 to Volume 2 is that it is ready for Focus Group review as long as Volume 1 does not result in additional revisions being required.
- C. Prior to the September meeting, Jim Douglas provided the Secretary with a draft-final version of Revision 5 of HASQARD Volume 3. Those Focus Group members present that had an opportunity to look at the draft stated that they believe it is ready for formal Focus Group review and comment prior to being voted on for approval.
- D. The status of Revision 5 of Volume 4 is that the 222-S Laboratory and PNNL are reviewing the revision to determine if they will be able to comply with the revision as written. This is likely going to be problematic because the revision to Volume 4 will invoke the DoD/DOE QSM as the source of requirements and not all of DoD/DOE QSM requirements can be met at those two laboratories. The work of reconciling requirements and determining exceptions that will be required is on-going by 222-S and PNNL.

Based on the status of the preparation to the revised HASQARD Volumes, the Focus Group discussed the next steps to take in completing the task of publishing Revision 5 to HASQARD.

Heather Medley stated she has some comments on Revision 5 of HASQARD Volume 3 but they are minor editorial comments in nature.

Glen Clark suggested that, for the on-site laboratories (222-S and PNNL), Volume 4 allow for exceptions to the QSM be justified in a laboratory's specific QA plan. These exceptions need to be based on sound technical issues (e.g., ALARA, security, exceedingly high cost to implement) and need to be specified in the laboratory's documentation. Glen Clark noted that, to date, ORP has not been auditing the 222-S laboratory to the laboratory QAP or to HASQARD. Walter Scott verified that Glen's statement was correct.

Glen Clark asked the Focus Group members if there was a convenience or desire in releasing Revision 5 or Volumes 1, 2 and 4 ahead of Volume 3. The Focus Group members assembled expressed the belief that Volume 3 is ready for the same level of

review as the other volumes and the effort should be to publish Revision 5 to all four volumes at the same time.

Jim Douglas stated that he had sent the current draft of Revision 5 of Volume 2 to the CHPRC sampling organization for an initial review and received an email with the generic comment that the revision to Volume 2 would make their program better and would not be difficult to implement.

Glen Clark suggested that all volumes be distributed by the Focus Group Secretary for final review. The Focus Group Secretary stated that he will send the latest revisions of the Volumes 1-4 to the Focus Group and request that comments be documented on some kind of review comment record (RCR) form. Use of the form will allow the Focus Group to document all comments received, how they were resolved and the commenter's concurrence on the resolution.

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

No new business was identified.

Cliff Watkins summarized the action items she collected from the discussion:

1. Cliff Watkins will forward the latest draft volumes of Revision 5 of HASQARD to the Focus Group along with an example RCR form requesting review and comment on the revision.
2. Cliff Watkins will receive the final request for inclusion of HASQARD requirements in the QSM text and elimination of QSM Appendix E from Glen Clark and forward that request to the DOE HQ ASP manager.

Hearing no additional new business, Cliff Watkins adjourned the meeting at 2:42 PM.

The next meeting of the HASQARD Focus Group was announced as being scheduled for 2:00 PM on Wednesday October 16, 2019 in Conference Room 199 at 2430 Stevens Center Place.