

## **HASQARD Focus Group**

### **Meeting Minutes**

June 12, 2012

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:06 PM on June 12, 2012 in Conference Room 308 at 2420 Stevens.

Those attending were: Huei Meznarich (Focus Group Chair), Cliff Watkins (Focus Group Secretary), Jeff Cheadle, Glen Clark, Shannan Johnson, Joan Kessner, Larry Markel, Karl Pool, Steve Smith, Noe'l Smith-Jackson, Chris Sutton, Cindy Taylor, Chris Thomson, Amanda Tuttle, Sam Vega, Rick Warriner and Eric Wyse.

- I. Huei Meznarich requested comments on the minutes from the May 15, 2012 meeting. No HASQARD Focus Group members present stated any comments on the May meeting minutes and, after hearing no objections, the minutes were approved.
- II. The status of open and recently closed action items was discussed.
  - a. A few hours before the May 15 meeting, Rich Weiss sent an e-mail to the Focus Group to propose revised language for the last paragraph in Section 5.3 containing the sentence about measured radioactivity being reported along with its total propagated uncertainty but without comparison to the estimates *a priori* MDC. At the May 15 meeting, the Chair asked the group to review this e-mail, provide Rich comments as necessary and be prepared to approve the revision at the next Focus Group meeting in June. Because Rich was not present at the June meeting, it could not be determined if he had received any comments on this. The action will be left open with a planned completion date of July 17.
  - b. At the May 15 meeting, Huei Meznarich reported that she looked up the definition of high purity water currently used in Section 6.1.1 and found it is equivalent to ASTM Type II water. Also at the May 15 meeting, Rich Weiss agreed to look into this matter and determine if a more appropriate definition can be specified in HASQARD. Because Rich was not present at the June meeting, it is not known if he has had time to research and/or propose a better definition for high purity water. The action will be left open with a planned completion date of July 17.
  - c. Huei Meznarich reported that checked MARLAP and QSAS for acceptance criteria for analyte concentrations measured in method blanks and provided options for use as an alternative set of criteria for this QC element in Table 6-1. In the QSAS an acceptable blank result criteria is one where the measured activity is less than two times the total

propagated uncertainty ( $<2\times$  TPU). This criterion is found in the QSAS Section D.4, DOE-4. For MARLAP, if the blank result is  $>2\times$  the TPU it is in the warning limit range and if the result is  $>3\times$  the TPU the blank is considered to be greater than the control limit. In another words, the MARLAP acceptance criteria is blank results  $<3\times$  TPU. Both QSAS and MARLAP use TPU to evaluate blank results. QSAS uses  $2\times$  TPU and MARLAP uses  $3\times$  TPU. The Focus Group did not seem prepared to approve a revised criteria at the June meeting. A new action item was identified to “Evaluate the alternative criteria for method blank acceptance for Table 6-1 and approve the criteria” and was assigned the entire Focus Group. The action item to research alternative criteria and provide them to the Focus Group was closed and moved to the completed actions list.

- d. A few hours before the May 15 meeting, Rich Weiss sent e-mail to the Focus Group to propose revised language for the definition of the terms “Tracer” and “Carrier” for Sections 6.2.6 and 6.2.7 respectively. The Focus Group also discussed whether a volume-specific glossary should be added to each Volume. At the May 15 meeting, the Chair asked the group to review the e-mail, provide Rich comments as necessary and be prepared to approve the revision at the next Focus Group meeting in June. Because Rich was not present at the June meeting, it could not be determined if he had received any comments on this. The action will be left open with a planned completion date of July 17.
- e. Prior to the Focus Group meeting on May 15 a sub-committee met on the detection limit language found in Section 7.5 of HASQARD. Huei Meznarich used the input received at that meeting to propose new language for inclusion in this section. That language was distributed in an e-mail on June 12. Because most of the MDL sub-committee had not had time to review and comment on this language, comments will be resolved at the next Focus Group meeting in July. A new action item was identified to “Evaluate the method detection limit language Huei proposed and approve revised language” and was assigned the entire Focus Group. The action item to convene a sub-committee on the topic of detection limits is closed and moved to the completed action list.
- f. At the April 17 Focus Group meeting, the Focus Group Secretary was given the action item to redistribute the write-up on detection limits provided several months ago in an e-mail by Eric Wyse. That action item was completed on May 1, 2012 and supported the May 15 meeting of the sub-committee discussed above. The action item is closed and has been moved to the completed actions list.
- g. At the April 17 Focus Group meeting, Kris Kuhl-Klinger agreed to refresh her memory and remind the Focus Group what the reference to Section 4.1.5.1 DOE-1 in the QSAS says that provides relevance to the comment

made on Section 7.7 of HASQARD. Kris provided a write-up that was subsequently provided to the Focus Group. After review of the material Kris provided, the Focus Group decided to strike the proposed revision from the document. The action item is closed and has been moved to the completed action list.

- h. As stated in item e above, a proposed revision to the MDL language was distributed in an e-mail on June 12. Because most of the MDL sub-committee had not had time to review and comment on this language, comments will be resolved at the next Focus Group meeting in July. A new action item was identified to “Evaluate the method detection limit language Huei proposed and approve revised language” and was assigned the entire Focus Group. The action item to provide detection limit language for Section 7.5 is closed and moved to the completed action list.
- i. At the May 15 meeting, Chris Sutton accepted an action item to review the list of information expected to be found on a chain-of-custody form in Volume 4, Section 3.3 and compare it to that required to be listed on a chain-of-custody form in Volume 2. On May 24, Chris Sutton provided an e-mail showing the language contained in Volume 2 (Rev. 3 and 4) and Volume 4. This e-mail was reviewed and commented on by several individuals from the Focus Group via e-mail exchange. At the June 12 meeting, the Focus Group requested Chris to provide the current set of required and optional information listed on a chain-of-custody form (as specified in the current proposed Rev 4 to Volume 2) to the Secretary. The Secretary will use track changes to show this language in the file showing the Volume 4 mark-up for the Focus Group to review and comment on at the July 17 meeting. The action for Chris to review the list of information expected to be found on a chain-of-custody form in Volume 4, Section 3.3 and compare it to that required to be listed on a chain-of-custody form in Volume 2 is closed and will be moved to the completed actions list.
- j. At the May 15 meeting, Huei Meznarich accepted the action to check the accuracy of the statement found in Section 7.7 of Volume 4 of HASQARD that says, “Additional information on the application, development, and use of control charts can be found in Washington State Department of Ecology (Ecology) 02-03-055, Procedural Manual for the Environmental Laboratory Accreditation Program.” Huei reported that the reference needs to be changed to: “Washington State Department of Ecology (Ecology) 10-03-048, Procedural Manual for the Environmental Laboratory Accreditation Program.” That change was approved and made to the working file containing Volume 4 at the June 12 meeting of the HASQARD Focus Group. The action for Huei to check the accuracy of the reference was closed and moved to the completed actions list.

- k. At the May 15 meeting, Steve Smith accepted the action to address issues identified with the notebooks and logbooks language in Section 6.3.3 of HASQARD and propose revised language. This action was completed and the proposed language was included in the version of Volume 1 that was reviewed later in the meeting. The action for Steve to address these issues was closed and moved to the completed actions list.

III. The status of the preparations of Revision 4 for Volume 2 was discussed.

- a. The status of the review for Volume 2 was reported by Chris Sutton. Chris reported that he accepted and incorporated most comments received. He completed addressing 7 of the 15 pages of comments received from WCH. Chris commented that interestingly enough, many comments were to sections of the document that had not been revised from the language contained in Revision 3. Chris stated that he believes that the changes will result in an improved document in the end.

IV. Actions to Complete Draft of HASQARD Volume 4, Revision 4

At the May 15 meeting of the Focus Group, action items were identified associated with all of the residual comments that make the final draft of Revision 4 to Volume 4 incomplete. The status of these action items is discussed in Section II of these minutes. Resolution of the actions is still in process. In addition to the actions listed in Section II of these minutes, one action remains that the Focus Group deferred until the draft of Revision 4 to Volume 1 is finalized. Specifically, that action is:

A comment made on Section 5.1, "Data Review" stated the entire section needed to be revised and reconciled against Volume 1. The Focus Group agreed to take no action on this outstanding commitment until the review of Volume 1 was completed. This comment remains an outstanding issue requiring resolution prior to completion of the final draft Revision 4 to Volume 4.

V. Discussion of Proposed Revisions to HASQARD Volume 1

The Focus Group Secretary had been provided another version of a file containing tracked changes showing the proposed Revision 4 to Volume 1. This version of the file shows the material discussed at the May Focus Group meeting (i.e., the results of the QA sub-group's gap analysis between QSAS requirements and HASQARD) and the movement of existing text found in Revision 3 of Volume 1 into new Sections that the QA sub-committee suggests is more appropriate for Revision 4 to this Volume. The Focus Group began reviewing the electronic file with the following discussions resulting:

In Section 1.0, “Introduction” of Revision 3 of HASQARD Volume 1 is the statement, “The HASQARD establishes quality requirements in response to DOE Order 414.1C, Quality Assurance.” The Focus Group discussed this and agreed that this is an inaccurate statement. The statement was struck from the document.

The QA subcommittee added a statement to Section 1.0, “Introduction” to say, “In addition, the HASQARD satisfies the requirement from DOE Order 450.1A, Environmental Protection Program, Attachment 1, Contractor Requirements Document, Section 1.b(6), to provide assurance that analytical work for environmental and effluent monitoring supports data quality objectives, using a documented approach for collecting, assessing, and reporting environmental data.” The subcommittee added this statement for clarification and to address an open action item from a 2010 DOE-RL oversight activity. However, since that time, DOE Order 450.1A has been rescinded. The Focus Group discussed this and agreed that this is an inaccurate statement. The statement was struck from the document.

The QA Subcommittee suggested adding material to Section 2.1, “Management Policy” to add content found in QSAS Section 4.2.6, 4.2.7 and 4.4. The original Section 2.1, said:

Management shall have documented policies that address and direct the implementation of safety and quality standards. These policies shall address the overall objectives and assign responsibilities (e.g., stop work authority) and the organizational independence for those personnel assigned to safety and quality oversight. Each field/laboratory’s QA plan and/or documentation shall define its policy regarding and its commitment to ethical standards, client confidentiality, and quality performance in field/laboratory operations.

The proposed revision added additional material to the last sentence in the section and a new section 2.1.1 to say:

Management shall have documented policies that address and direct the implementation of safety and quality standards. These policies shall address the overall objectives and assign responsibilities (e.g., stop work authority) and the organizational independence for those personnel assigned to safety and quality oversight. Each field/laboratory’s QA plan and/or documentation shall define its policy regarding and its commitment to ethical standards, client confidentiality, and quality performance in field/laboratory operations, including electronic transfer and transmission of results.

Data integrity procedures shall be established and maintained. These procedures shall be defined in detail within the quality plan. The data integrity procedures shall be signed and dated by senior management, and shall include the following:

- a) data integrity training,
- b) signed data integrity documentation for all laboratory employees,
- c) in-depth, periodic monitoring of data integrity, and
- d) data integrity procedure documentation.

Processes shall be established to ensure that management and personnel are free from any undue internal and external commercial, financial and other pressures and influences that may adversely affect the quality of their work. These procedures and the associated implementation records shall be properly maintained and made available for assessor review. The data integrity procedures shall be annually reviewed and updated by management. Such identification shall include the date of issue and/or revision identification, page numbering, the total number of pages or a mark or signify the end of the document, and the issuing authority(ies).

#### 2.1.1 Contract Review

Procedures for the review of requests, tenders, and contracts shall be established and maintained. The policies and procedures for these reviews leading to a contract for environmental testing shall ensure that the requirements, including the methods to be used, are adequately defined, documented, and understood. These policies and procedures shall ensure that the laboratory has the capability and resources to meet the requirements. These policies and procedures shall ensure that the appropriate environmental test method is selected and capable of meeting the clients' requirements.

The review shall cover any work that is subcontracted by the laboratory. The current accreditation status of the laboratory must also be reviewed. Records of reviews, including any significant changes, shall be maintained. Records shall also be maintained of pertinent discussions with a client relating to the client's requirements or the results of the work during the period of execution of the contract. The client must be informed of the results of this review if it indicates any potential conflict, deficiency, lack of appropriate accreditation status, or inability on the laboratory's part to complete the client's work.

Any differences between the request or tender and the contract shall be resolved before any work commences. Each contract shall be acceptable both to the laboratory and to the client. The client shall be informed of any deviation from the contract. If a contract needs to be amended after work has commenced, the same contract review process shall be repeated and any amendments shall be communicated to all affected personnel.

Suspension of accreditation, revocation of accreditation, or voluntary withdrawal of accreditation must be reported to the client.

The Focus Group discussed this additional text and determined that this material is more appropriately placed in contracting documents used to procure laboratory services. The additional content was removed from the proposed Revision 3 to Volume 1.

The QA subcommittee proposed adding extra material to Section 3.3, "Training Records" to include:

The following administrative records shall be maintained:

- a) personnel qualifications, experience, and training records; and
- b) records of demonstration of capability for each analyst.

The Focus Group agreed to this change.

While discussing the QA subcommittee's suggested change to Section 3.3, the existing first sentence in this Section was also addressed. The sentence in Revision 3 of Volume 1 says, "Objective evidence of personnel job proficiency shall be documented and maintained for the duration of the project or activity affected, or longer if required by statute or organizational policy." The Focus Group discussed that it is not clear what is meant by "for the duration of the project or activity affected, or longer if required by statute or organizational policy." The Focus Group agreed to strike this portion of the sentence for Revision 4 of the document.

The Focus Group spent a great deal of time discussing the major revision proposed by the QA subcommittee on Section 4.0 "Procedures." The proposal includes revision the title of this Section to "Methods" and addressing only qualification and revisions to sampling and analytical methods. The reason for this proposed change is that the content of Revision 3 was addressing methods and documentation of these methods in a confusing fashion. The subcommittee sought to ensure that the subject of revising procedures is captured as a document control matter and that the subject of revising technical methods is addressed separately. Although much of the material presented was information already in Revision 3 of the HASQARD that was relocated with the previous location identified in the electronic version being displayed at the meeting, the Focus Group had a difficult time reaching consensus on such a major change in a meeting where this much material was presented for the first time. The outcome was to request the Secretary to send out files containing the new material for the Focus Group to review prior to the next Focus Group meeting where it can be discussed again. As part of the discussion, Glenn Clark accepted the **action item** to locate a white paper he is aware of on deviating from methods and provide it to the Focus Group for consideration of the material presented in this proposed new section.

The Focus Group discussed proposed changes to Section 5.0, "Corrective Action and Quality Improvement." The first sentence was revised to allow for a graded approach and to specify an expectation for timeliness to say, "A system based on a graded approach shall be established and implemented as soon as practical to identify, document, correct, and prevent quality problems." The Focus Group accepted this proposed change. A final sentence was also suggested to say, "Where the data quality is or may be impacted, the client is notified and appropriate resolution is agreed upon." The Focus Group also accepted this proposed change.

After discussing Section 5.0 of this version of the proposed changes to Volume 1, the Focus Group Chair noted the time for closing the meeting was at hand. Hearing no objections, the Focus Group Chair adjourned the meeting at 4:29 PM.

The next meeting is scheduled for July 17, 2012 at 2:00 PM in 2420 Stevens, Room 308.