

HASQARD Focus Group
Meeting Minutes
November 27, 2012

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:09 PM on November 27, 2012 in Conference Room 308 at 2420 Stevens.

Those attending were: Huei Meznarich (Focus Group Chair), Cliff Watkins (Focus Group Secretary), Glen Clark, Robert Elkins, Joan Kessner, Larry Markel, Mary McCormick-Barger, Steve Trent, and Rich Weiss.

- I. Huei Meznarich requested comments on the minutes from the October 16, 2012 meeting. No HASQARD Focus Group members present stated any comments on the October meeting minutes and, after hearing no objections, the minutes were approved.
- II. The status of open action items was discussed.
 - a. Eric Wyse accepted an action to research the references for the duplicate acceptance criteria for inorganic analyses found in Table 6-2 to ensure they are accurate and that the methods from which these criteria derive are known and provide results of this research to the Focus Group at the August meeting. Eric was not present at the August meeting, so this action is deferred to the October Focus Group meeting. Eric stated that he had forgotten this action was still on his plate and that he believes the figure in HASQARD is not consistent with published methods (upon which most QC limits in HASQARD are based). Eric agreed to look into this and report his findings to the Secretary as soon as possible. Eric was away on family travel at the time of the November meeting. Between the October and November meeting, Eric provided input to the Focus Group Secretary. The Focus Group Secretary shared Eric's input and the group members present decided to not use the input provided by Eric but rather retain existing QC criteria for duplicate acceptance criteria for inorganic analyses found in Table 6-2 and revised the draft text of that table to read:

“ $\leq 20\%$ RPD when result $> \text{EQL}$ for liquids, $\leq 35\%$ RPD when result is $> \text{EQL}$ for solid samples.”
 - b. At the August meeting, the Focus Group Secretary took an action to act on a request to issue the revised QC Limit Tables proposed for Revision 4 of HASQARD as an initiative for the Focus Group voting members to vote on for immediate implementation as a de minimis change. As the Focus Group discussed the status of this action item, Eric Wyse voiced concern that issuing these tables would not meet the definition of a de minimis change and could therefore not be done. Rich Weiss pointed out that most

of the proposed revision falls in the category of providing clarification because methods upon which the QC limits are based have changed making the HASQARD revisions a clarification. The QC Limit Table should be evaluated quickly for issuing them as a de minimis change. This is because it would take a while for Revision 4 of all four volumes of HASQARD to be released. If there is no increase in contractual dollars for the laboratory, it is likely that the Contractors would not have a need for a Request for Equitable Adjustment (REA). The clarification for the proposed QC Tables would benefit laboratories, projects and DOE and would be available for use in a timelier manner if it were to be issued as a de minimis change. From the October meeting, the Secretary had the action to produce a proposed de minimis change that includes all of the Tables that have been revised and provide the Focus Group with the definition of de minimis change prior to the next Focus Group meeting so this can be discussed again at that time. At the November meeting, the draft de minimis change was reviewed in the new business portion of the meeting (Section IV of these minutes).

III. The status of the activities to produce Revision 4 of HASQARD was discussed:

- a. The status of the preparations of Revision 4 for Volume 2 was discussed. Steve Trent said that a meeting was held on November 26 concerning the comments Steve has received for the revision to Volume 2. There were a total of about 20 pages of comments to discuss. The assembled meeting attendees worked through all the comments. The resolutions agreed to will result in some work revising the current draft of the document. Steve's schedule goal is to complete the revisions during December. Once the draft is complete, Steve will forward the document to the Secretary for distribution to the entire Focus Group so discussion on the document can begin in January. Steve listed several issues that will be presented for discussion in future Focus Group meetings for resolution and incorporated into Volume 2 accordingly. These issues include:
 - i. The current draft of Volume 2 includes a program description of the Integrated Safety Management System (ISMS) in Section 3.0. A concern has been raised about what is ISMS changes or if it is "reinvented" under a different title. The group assembled at the comment resolution meeting stated maybe we should not be referencing that program so specifically in HASQARD.
 - ii. Appendix A in the current draft includes a table of sample collection bottles, preservatives, etc. The group assembled at the comment resolution meeting expressed a concern that this table may be out of place and may be too rigid for the needs of projects

that need to collect less sample due to radiation concerns, etc. The table is currently written for low level groundwater and soil samples.

- iii. The current draft of Volume 2 includes several places where provisions for highly radioactive samples are included. The group assembled at the comment resolution meeting expressed a concern that the level of detail with which highly radioactive samples are discussed in the Volume 2 draft is not consistent with the other Volumes of HASQARD.
 - iv. The current draft of Volume 2 includes references to the International Air Transportation Association (IATA) requirements. Several members present at the comment resolution meeting felt that Department of Transportation requirements adequately cover all matters associated with samples collected under HASQARD. One Contractor's shipping organization believes reference to IATA is necessary. This organization's representative agreed to work on this to achieve an appropriate resolution.
 - v. The current draft of Volume 2 includes provisions for electronic data gathering tools. Many of these tools may use custom developed software. Therefore, software quality assurance (SQA) requirements from Volume 1 will need to be incorporated by reference. However, in reviewing Volume 1, it appears that the SQA requirements are aimed at Laboratory Information Management Systems (LIMS) and do not address configuration control, software development, etc. as required by typical SQA programs.
- b. The remaining actions to complete a draft revision to Volume 4 were discussed:
- i. Between the October and November Focus Group meetings Steve Trent provided input on Section 3.3 to ensure requirements for reviewing chain-of-custody forms received are consistent with the required chain-of-custody form content specified in Volume 2. As a result, the draft language for Volume 4 now reads:

"Verify that the chain-of-custody documentation is complete and legible. The documentation shall include the following information:

- Client/Project or location name/number
- Client sample number
- Date, time and location (or traceable reference thereto) of sample

collection

- Signatures and printed names of individuals involved in sample transfer and storage, to include all dates, times, and locations as applicable”

It was recognized that this language in Volume 4 will need to be monitored as the review of the draft of Volume 2 is conducted to ensure requirements remain consistent between the two documents.

- ii. The frequency requirements for serial dilution analyses specified in Table 6-3 were discussed. The current revision of HASQARD requires these analyses once per every batch of samples prepared. The Focus Group members present agreed to change the frequency requirements to: “One per analytical batch or when internal standard or post-spike criteria failure occurs.” The serial dilution is performed at the analytical batch. In order to remove some confusion, the revised wording clarifies that frequency is once per analytical batch and removed the words “sample prepared” as is present in the current revision of HASQARD.
 - iii. An issue was identified in the organic analysis Section 6.7.2 where a sentence inappropriate referenced a paragraph relevant to inorganic analysis only. That sentence was revised from, “Subsequent routine performance checks are made using the equivalent of a CCV (see Section 6.5.3).” to “Subsequent routine performance checks are made using the equivalent of a CCV (see Section 6.7.3).” A typo was also corrected in Section 6.7.3, “All samples analyzed after the last acceptable CCV, (see Table 6-7 through Table 6-8) shall be reanalyzed.” The reference to Table 6-7 should be Table 6-5.
 - iv. The latest revision to the MDL/PQL language was discussed. Rich Weiss worked with Huei Meznarich to offer another version of the language that is close to gaining acceptance. In this latest revision, Rich stated the definition of QL was revised to remove the word of “minimum” from the definition of quantitation limit. The QL section (7.5.1.3) of the language was modified to remove the words “estimate” and “methods” and a few other places for clarification in Section 7.5. The latest revision was provided electronically to the Secretary for insertion in the working version of the draft revision to Volume 4.
- c. The actions to complete a draft of Revision 4 to Volume 1 of HASQARD were discussed.

- i. Based on input from the Focus Group at the August meeting, the Focus Group Secretary continues to work on deleting the language proposed by the QA Sub-group that would have divided the section on methods into one on procedures and a separate section on methods.
 - ii. In Section 4.3.5 of Volume 1, there is a sentence that reads: “Guidance in understanding when a particular method qualifies as a required regulatory method can be found in DOE/RL-94-97, *Selection of Analytical Methods for Mixed Waste Analysis at the Hanford Site*.” The Focus Group discussed the relevance and requirements in this document. Some of the language in this document sound like requirements that are in addition to HASQARD. The Focus Group members present discussed whether the applicable requirements would be better suited as call outs in HASQARD and the reference to the DOE/RL-94-97 dropped entirely. The age of the DOE/RL-94-97 document is evident in that it references HASQAP which was a predecessor document to HASQARD. The Focus Group members present agreed that as HASQARD is revised, the content of the DOE/RL-94-97 document should be considered and either the reference removed or the content of the document addressed as applicable and appropriate.
- IV. In the area of new business, the proposed de minimis change to issue the QC Tables proposed for Revision 4 of Volume 4 immediately was discussed:
- a. The Focus Group members present agreed that some of the changes to the QC Tables revise requirements as opposed to simply making a clarification. The Focus Group requested the Secretary to revise the language of the preamble to the de minimis change to clearly state that changes to requirements (identified by highlight) are not necessary to implement immediately but are anticipated changes to HASQARD that will be issued in Revision 4. Changes that are simply clarifications will not be highlighted in the final de minimis change and the preamble will state that all parts of the Tables, except those highlighted, will be effective immediately. The preamble will state that HASQARD users will have the option to perform work to the new requirements (if implementation does not require the Contractor to provide a Request for equitable Adjustment to DOE) or simply use the existing requirements until Revision 4 of HASQARD is formally issued. The Secretary took the action to revise the deminimis proposal as suggested and present it at the December 18 meeting for consideration by the Focus Group.

After discussing new business, and hearing no additional new business, the Chair suggested the meeting was complete. Hearing no objections, the Focus Group Chair adjourned the meeting at 4:05 PM.

The next meeting is scheduled for December 18, 2012 at 2:00 PM in 2420 Stevens, Room 308.