

HASQARD Focus Group

Meeting Minutes

January 15, 2013

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:02 PM on January 15, 2013 in Conference Room 308 at 2420 Stevens.

Those attending were: Huei Meznarich (Focus Group Chair), Cliff Watkins (Focus Group Secretary), Glen Clark, Scot Fitzgerald, Larry Markel, Karl Pool, Dave St. John, Chris Sutton, Chris Thompson, Steve Trent, Amanda Tuttle and Eric Wyse.

- I. Huei Meznarich requested comments on the minutes from the December 18, 2012 meeting. One issue raised in a comment the Secretary received on the draft minutes was the fact that the next meeting date was incorrect in the draft. The Secretary stated that he had corrected this error in the final draft.

No HASQARD Focus Group members present stated any other comments on the December meeting minutes as revised and, after hearing no objections, the minutes were approved.

- II. The status of the activities to produce Revision 4 of HASQARD was discussed:
 - a. The status of the activities to produce Revision 4 of HASQARD Volume 1 was 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*" (hereinafter referred to as the DOE/RL-94-97 document). The Focus Group continues to research the applicability of this document particularly as it relates to DOE-ORP activities. Since the December meeting, Jeff Cheadle was contacted by the Focus Group Chair and is determining whether this document is referenced in contracts issued by ORP. Jeff was not present at the meeting to address this question and the

matter was tabled for later discussion.

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

- i. In the November Focus Group meeting, Steve Trent discussed the global issues for which unilateral comment resolution was not possible (see November meeting minutes). These global issues needed to be resolved in group review. The Focus Group was provided the draft of Volume 2 to review in December and the global issues were discussed.
- ii. The first global issue involves whether the Integrated Safety Management System (ISMS) should be discussed in great detail in Section 3.0. Knowing he would not be able to be present at the January meeting, Rich Weiss provided the Secretary with written comments concerning the global issues to be resolved for Volume 2 in an e-mail note. The Secretary read Rich's comments on inclusion of ISMS to the Focus Group members present. Rich's comments on inclusion of ISMS included:

“ISMS/EMS is broad based and applies to many other activities/processes than sampling. Inclusion of a large section of ISMS "boilerplate" at the front of Section 3.0 dilutes the definition of the specific criteria applicable to sampling later discussed. The "meat" of the current Section 3 was contained under "Sampling Systems" in rev 3. My thought is to delete all of the proposed Section 3.0 and rename Section 3.1 as "3.0 Sampling System Guiding Principles". This gets principle ISMS buzz words into the title. Remove the ISMS/EMS direct text but include an acknowledgement that the specifics noted are all under the ISMS umbrella. I've taken a shot at a rewrite. Also, note my specific comment on referencing ISMS/EMS. I've added the best references I could find this morning (hopefully these are not contract specific).”

Rich included an attached file with his e-mail where his suggested text revisions were included for consideration. This file was displayed on a viewing screen for the Focus Group members present to read Rich's suggestions. Eric Wyse agreed with Rich that ISMS is not specific to sampling and seemed a bit inappropriately over emphasized in the sampling volume while not mentioned in any of the laboratory of field methods volumes of HASQARD. Chris Sutton provided the basis for inclusion of ISMS concepts in the draft of Volume 2 being reviewed. Chris stated that this version of Volume 2 is a complete rewrite from revision 3. Section 3 of HASQARD Volume 2, revision 3 had a

section on “Facility Management.” The team that took on the task to revise Volume 2 felt that much of the Facility Management section was covered by the ISMS requirements used by all Hanford Contractors. Because of that the ISMS concepts were added to replace the Facility Management section. Dave St. John stated that perhaps the requirements of ISMS should be included in Volume 1 and Volume 2 should be specific to sampling. Huei Meznarich added a concern that mentioning ISMS requirements in HASQARD may be inappropriate for many reasons. Among Huei’s concerns was the fact that HASQARD becomes a document to which laboratory and sampling organizations are assessed. If ISMS is included in HASQARD, it becomes another set of requirements that assessment performers find themselves needing to address when auditing the organization’s compliance with HASQARD. Also, because commercial laboratories are required to comply with HASQARD, moving ISMS to Volume 1 would not be appropriate since the commercial laboratories would not be required to comply with this safety program that DOE has implemented with its Contractors. Eric Wyse agreed that the on-site laboratories and sampling organizations will be audited to ISMS compliance by organizations not using HASQARD as the basis for the requirements, therefore ISMS seems too specific for the HASQARD scope. Also, the ISMS language would not be applicable to QA and therefore inappropriately placed if moved to Volume 1. Chris Thompson agreed that there is potential for “scope creep” in HASQARD if requirements from ISMS start getting included. Eric Wyse stated that ISMS would not be irrelevant to the commercial laboratories because the Hanford Contractors do have an expectation that those laboratories have a safety program, it just does not necessarily have to be ISMS. Chris Sutton stated that part of the motivation to include ISMS in Volume 2 came as a result of recent stop-work/corrective actions that the CHPRC sampling organization experienced. Chris stated that sampling requires a directed planning process that includes addressing the ISMS concepts. The working group that revised Volume 2 wanted to ensure relevant work management practices were addressed in HASQARD. Based on the discussion, Chris stated he will look at Section 3.1 in Revision 3 of Volume 2 and see if the Facility Management text can be included in Revision 4 without specific reference to ISMS. Steve Trent will work with Chris Sutton to incorporate any revisions Chris suggests in the draft of Revision 4 of Volume 2.

- iii. The second global issue relates to Appendix A in the draft Revision 4 of Volume 2. Appendix A in the current draft includes

a table of sample collection bottles, preservatives, etc. Steve Trent had indicated that a working group assembled for a comment resolution meeting for the draft Revision 4 of Volume 2 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 a smaller sample due to radiation concerns, etc. The table in Appendix A is currently written for low level groundwater and soil samples. Rich Weiss's written comments were read to the group. These comments mention the proposed revisions Rich provided in the file attached to his e-mail note to the Secretary and included:

"I'm revising the document to downplay appendix A. The text changes are actually minimal. There are some major errors in the actual Appendix. I've fixed the ones I know about, probably good to get another set of eyes to look at the table. I'm not going to try to address omissions. Also note that the appendix doesn't address sample volumes, I'm deleting volumes from the table title and some volume related comments at the bottom."

The Focus Group members present looked at the file provided by Rich with his suggestions for Appendix A included. The Focus Group agreed with Rich's comments and added that some of the entries in the table could vary by which laboratory is accepting the sample for analysis, radiation levels in the sample, etc. The Focus Group members present felt Appendix A should be retained as a reference but no text in Volume 2 should be included to imply any of the entries in the appendix represent a requirement. Steve Trent took the action to incorporate the Focus Group's suggestions.

- iv. The third global issue is related to how to treat samples of relatively high radioactivity. The current draft of Revision 4 of Volume 2 includes several places where provisions for highly radioactive samples are included. The group assembled at the December meeting held to address Volume 2 comment resolution 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. The Secretary read Rich Weiss's comments on this global issue which included:

"The proposed revisions made to the document make this a little better, but it still doesn't feel right to me. One important input to what we (Hanford) does regarding highly radioactive samples will be the resolution of incorporation/disincorporation/cancelation of DOE/RL-94-97 Selection of Analytical Methods for Mixed Waste Analysis at the Hanford Site. This document defines the issues associated with tank sampling and much parroting the content of

that document was used for the high rad additions. If we keep/update DOE/RL-94-97 this really should cover the issues. If we keep the current draft text, it won't really impact WCH activities, however, I've found one hole (need to document regulator acceptance) that has to be fixed (see my comment in Section 2.1.1). The more I looked at the sections, the less I liked them. I've done a major revision. Most of this was to move the best of the high-level philosophy text to Section 2.1.1 where it really seems most appropriate. This leads to a lot of then redundant text in subsequent sections that I'm proposing to delete (totally kills some). I've generalized much of the remaining text and please look closely at my comments for discussion specific deletions.”

The Focus Group looked at the revisions Rich proposed. Larry Markel added that he would like a reference for where recommended containers for samples of higher radioactivity can be found. Because of that, when preparing the original version of the draft of Revision 4 for Volume 2 Larry had included specific language for relatively highly radioactive samples in all sections where the subject was relevant. The advantage to this is the fact that Volume 2 is used as a field reference by sampling teams. If the subject of relatively highly radioactive samples is confined to one section, the subtle differences allowed (or required) for these samples might be missed by sampling personnel turning to a different section of Volume to find requirements. Steve Trent said he would use the input provided by Rich and work with Larry Markel to ensure the subject is adequately included in the next version of the draft.

- v. Another global issue is that Section 4.4.7.2 of the current draft of Revision 4 of Volume 2 includes references to the International Air Transportation Association (IATA) requirements. Specifically, the draft Section includes the text:

“Materials are classified by DOT/IATA as radioactive material where both the activity concentration and the total activity in the consignment exceed the specified values. Samples shall be screened to determine if they exceed the activity concentration for exempt material and the activity limit for exempt consignment. When screening indicates the samples are radioactive, they shall be properly classified, described, packaged, marked, labeled, and transported according to applicable DOT/IATA regulations.”

Several members present at the Volume 2 comment resolution meeting held in December felt that Department of Transportation

(DOT) requirements adequately cover all matters associated with samples collected under HASQARD. At the December meeting, one representative present stated that their company's shipping organization believes reference to IATA is also necessary. Rich Weiss's written comments included a statement that he had no personal comments on this subject and suggested input for WCH come from Dave St. John. Chris Sutton stated that he had asked the CHPRC shippers to look at the section to determine if calling out specific IATA requirements is applicable since it is actually DOT regulations that Hanford shippers comply with. The DOT regulations incorporate IATA requirements by reference. The CHPRC shipping organization provided a proposed revision and Chris requested the WCH shippers to look at the revised text. Chris noted that the language on screening samples for radioactivity prior to shipment found in the current Revision 3 of Volume 2 is much more detailed than the proposed language for Revision 4 of Volume 2. The revision to Section 4.4.7.2 that deletes reference to IATA further "waters down" the subject of pre-shipment screening of samples. Dave Shea added that the requirement to check a laboratory's radioactive materials handling license and notify a laboratory of sample radiation levels prior to shipment needs to be maintained in the document. However, to ensure that the requirements in HASQARD are adequate and reflective of actual practice, Dave Shea suggested Rich Weiss review the final revision of this section to ensure accuracy of the text with WCH's standard practices. Dave St. John agreed to review the proposed revision again to ensure that the Sections that call out transportation requirements are appropriately worded.

- vi. The last global issue discussed involved the fact that 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. The Focus Group has pointed out that 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. Rich Weiss's written comments included the following on this global issue:

"This is really a potential deficiency in Volume 1... We need to find the services of a SQA person."

Steve Trent expressed a belief that the subject of SQA should be brought up to date in Volume 1. Amanda Tuttle confirmed this view in stating her experiences in conducting audits to HASQARD

SQA requirements at commercial laboratories. During some of these audits the laboratory information technology personnel have informed her that the requirements are out dated and don't always apply to common SQA practices today. The Focus Group agreed with the view that an individual with significant SQA expertise should be consulted to improve the language for SQA in HASQARD. Steve Trent took the action to identify an SQA subject matter expert to support the efforts to ensure the subject is appropriately covered in Revision 4 of Volume 1 and/or Volume 2.

- vii. Steve Trent said he would take the input received and revise the document accordingly. The document will be completed and ready for page by page review in the February meeting.
- c. The remaining actions to complete a draft revision to Volume 4 were discussed:

The unresolved issues with completing a draft of Revision 4 to Volume 4 are:

- The language in the sample receiving section concerning the expectations for review of chain-of-custody documentation may change based on the final language used on this topic in Volume 2.
- Section 5.0, "Data Collection" will need to be revised and reconciled with final draft of Volume 1.
- Technical editing to ensure format consistency and correct/consistent table and section call-outs.

The Focus Group requested that the Secretary send the working copy of the electronic file containing Volume 4 to the entire Focus Group. This allows Focus Group members 2 or 3 months for complete review of the draft final Revision 4 of Volume 4 in preparation for final discussions to occur as soon as Volume 2 has been discussed at upcoming Focus Group meetings.

- III. The proposed de minimis change to issue the QC Tables proposed for Revision 4 of Volume 4 immediately was discussed:

At the December meeting, the Focus Group members present suggested that the proposed de minimis introduction be revised to remove any discussion of new requirements. The Secretary took the action item to revise the de minimis proposal as stated and present it at the January 15 meeting for consideration by the Focus Group. The Secretary revised the proposal but displayed a file with both requirements changes and clarifications present in it. This was to allow Focus Group members to

observe the revisions made as the requirements versus clarifications in the tables were removed or retained. Following this editing exercise, the Secretary agreed to send out the file containing the draft final de minimis proposal to the Focus Group distribution to allow a vote on issuing the de minimis change to occur at the February meeting.

- IV. The Focus Group Chair asked if there was any new business. Chris Sutton stated that he understands that MSA is doing a statement of work (SOW) for obtaining commercial laboratory services. Chris is concerned that this SOW may be referencing HASQARD Revision 3 with Revision 4 very close to being issued. Huei Meznarich stated that she will work closely with the author of the SOW to ensure it contains no conflicts between requirements stated in the SOW, Revision 3 of HASQARD and the draft of Revision 4 of HASQARD.

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 3:50 PM.

The next meeting is scheduled for February 19, 2013 at 2:00 PM in 2420 Stevens, Room 308.