

HASQARD Focus Group

Meeting Minutes

February 26, 2013

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:02 PM on February 26, 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, Shannon Johnson, Joan Kessner, Larry Markel, Mary McCormick-Barger, Dave St. John, Steve Smith, Steve Trent and Eric Wyse.

- I. Huei Meznarich requested comments on the minutes from the January 22, 2013 meeting. No HASQARD Focus Group members present stated any comments on the January meeting minutes 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 was continuing to try to determine the best way to delete 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. On January 31, the Secretary received a call from the QA Sub-Group Chair, Steve Smith. Steve asked what was taking so long in accomplishing this activity. The Secretary relayed his trepidation in trying to make a large number of revisions to a document that had been edited to its current form by someone else. The main concern being that new material may be lost when trying to revise the document back to “the way it was originally.” Steve asked that the file be returned to him so he and Larry Markel of the QA Sub-group can revise as requested by the Focus Group. Steve reported that he hopes to have Volume 1 in a form ready for final review by Larry Markel by March 1. Once Steve and Larry are satisfied with the document, it will be transmitted to the Focus Group Secretary for subsequent transmittal to the Focus Group for final review.
 - 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 Chair contacted Jeff Cheadle to ask if this document is referenced in contracts issued by ORP. Jeff was not present at the meeting but the Chair stated that in discussion she held with Jeff, he indicated that it is not in the ORP contracts. Because Ecology has indicated they feel some of the text in this document is relevant to highly radioactive samples at Hanford, the Focus Group had proposed to incorporate most of the material in this document as an Appendix to Volume 1 of HASQARD. There is no known copy of this document in a Word format as it is believe it was written by Patti Morant when she was at Westinghouse Hanford. There are pdf file versions of this document available. The Secretary took the action item to convert a pdf file version of this document to Word format, attempt to reconcile the inevitable errors generated when a conversion is made from pdf to .doc formats and bring the file to the next Focus Group meeting where it will be reviewed and revised by those in attendance.

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

Steve Trent summarized the status of the Volume 2 preparation efforts. At the January meeting of the Focus Group, Steve received input from the group on several issues and worked on these actions with WCH personnel between the January and February meetings.

The first issue to be addressed was the language used regarding shipping and transportation requirements for samples. Steve reported that the WCH personnel have reviewed the language and all parties are satisfied with the currently proposed draft.

The second issue was to address Rich Weiss’ proposed method for addressing language for highly radioactive samples and have Larry Markel review the revision. Steve reported he has not had time to complete that action yet.

A third action was on the mention of software QA in Volume 2. Because more electronic technology for recordkeeping is being used in the field and Volume 2 currently references Volume 1 for software QA requirements, Steve will need the help of the QA Sub-group to resolve comments he has received on software QA language in Volume 2. Steve requested Steve Smith to support his efforts to appropriately address software QA in Volume 2 and Steve agreed to help.

The final action Steve had from the January meeting was to clean up the ISMS language from the current draft of Volume 2. Steve said that will be

completed prior to the next meeting of the Focus Group on March.

Steve hopes to have all of these actions completed prior to the next meeting of the Focus Group in March. If completed, the document will be forwarded to the Secretary who will forward it to the Focus Group for final review.

- 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 regarding requirements for logbooks and notebooks.
- 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 the final drafts of Volume 1 and Volume 2 have 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:

Prior to the February meeting, the Secretary transmitted 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. The Chair stated that one more month should be taken to review the de minimis proposal carefully to ensure it is satisfactory prior to taking a vote on this matter. A vote on the de minimis proposal was tabled to be taken up again at the March meeting of the Focus Group.

- IV. Prior to the February meeting, the Secretary received an e-mail from Glen Clark requesting an item to be added to the new business portion of the agenda for the February meeting. Glen summarized this new business to the Focus Group:

Glen wanted to discuss the topic of HASQARD compliance by commercial laboratories. The WRPS QAPD requires commercial laboratories to conduct analyses in compliance with the DOE Consolidated Audit Program (DOECAP) *Quality System for Analytical Services* (QSAS). Consequently, WRPS has not been requiring HASQARD compliance by commercial laboratories. Several years ago WRPS revised their QAPD to incorporate the DOECAP QSAS standard based on some earlier memoranda from DOE-HQ indicating a desire for the Field Office to implement DOECAP and the ORP response back to DOE-HQ. Glen wanted to know if the language in the HASQARD paragraph (HASQARD Volume 1, Section 1.0, 2nd paragraph) should be revised to also allow DOECAP QSAS compliance by commercial laboratories as an alternative to HASQARD.

“The HASQARD serves as the quality basis for all sampling and field/laboratory analytical services provided to support the Hanford Site environmental clean-up mission. This includes work performed by contractor and commercial laboratories and covers both radiological and non-radiological analyses. The HASQARD also applies to field sampling, field analytical, and research and development (R&D) activities that support work conducted under the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) (Ecology et al 2002) and regulatory permit applications, and applicable permit requirements described in Section 1.1.1 of this volume. HASQARD applies to work done to support process chemistry analysis (e.g., ongoing site waste treatment and characterization operations) and R&D projects related to the Hanford Site environmental clean-up mission. This ensures a uniform umbrella of quality to analytical site activities predicated on the concepts contained in the HASQARD. The use of the HASQARD will ensure data of known quality and technical defensibility of the methods used to obtain that data.”

Glen was especially interested to know Ecology's expectation and what the other contractors are required to flow down to commercial laboratories performing environmental cleanup analyses. Unfortunately, no representative from Ecology was present for the HASQARD meeting. Glen stated that the way HASQARD reads right now seems like a requirement for HASQARD compliance by commercial laboratories performing environmental cleanup analyses. Glen wanted to know how the other Contractors at Hanford are managing commercial laboratories relative to HASQARD and DOECAP.

Joan Kessner stated that WCH requires HASQARD compliance by all laboratories (on-site or commercial).

Eric Wyse stated that the Tank Sampling and Analysis Plans (TSAPs) that serve as their work authorizing documents say that 1) laboratories (and Eric interprets this to mean all laboratories) analyzing the associated samples must comply with HASQARD, and 2) commercial laboratories must comply with QSAS, or have completed a DOECAP audit.

The TSAPs that are done by WRPS that indicate samples will be sent off-site to commercial laboratories reference the Quality System for Analytical Services (QSAS) document (the quality program to which DOECAP audits are conducted) and require a DOECAP approved laboratory.

Huei Meznarich stated that when commercial laboratories are used by MSA at WSCF, the SOW references HASQARD but the laboratories are approved for use by successful completion of a DOECAP audit.

The Focus Group asked Joan if WCH accepts a DOECAP audit or if they perform a separate HASQARD audit. Joan replied that due to a letter WCH received from DOE essentially reprimanding WCH for not approving laboratories to the HASQARD requirements, they have always done a HASQARD audit and have not recognized DOECAP audits as their commercial environmental laboratory analysis supplier evaluation and approval process. Joan stated that the Regulators at Hanford are comfortable with HASQARD. Also, because HASQARD is called out in the WCH contract, they have always found it appropriate to flow-down HASQARD requirements to the commercial laboratories. Joan added that there is likely no issue with recognizing a DOECAP audit to meet supplier evaluation requirements and invoke HASQARD in the contract SOW. The reason WCH continues to perform HASQARD audits at commercial laboratories, regardless of their DOECAP approval status, is due to direction received from DOE to do so.

Larry Markel stated that the WRPS QAPD was written to explicitly show a separation between HASQARD being applicable to Hanford Site laboratories and the QSAS and DOECAP being applicable to the commercial laboratories. This QAPD was reviewed and approved by DOE-ORP and therefore WRPS feels it was accepted as the supplier evaluation/approval and QA requirements flow-down process for commercial laboratories utilized by WRPS regardless of the mention of HASQARD in the WRPS contract.

Steve Smith mentioned that CHPRC's interpretation of the reference to HASQARD in their contract has always been that they must flow down HASQARD to all laboratories (on-site and commercial) performing the analyses to which HASQARD is applicable.

Larry Markel pointed out that HASQARD Volume 1, Section 8 mentions subcontracting and implies HASQARD applicability to subcontracting although does not specifically state that all of HASQARD shall be applied to subcontracts. Rather, Section 8 states, in part, that procurement controls shall be established to include, “Identifying applicable technical and administrative requirements from HASQARD for subcontracted services and items, including acceptance criteria.” Therefore, a Contractor could be in compliance with this requirement by establishing a procurement control stating that only those portions of HASQARD that are common to the QSAS are applicable for commercial laboratory procurements. Larry posed the idea of revising Volume 1 to explicitly allow another QA Standard to be applied to commercial laboratory procurements.

Joan Kessner stated that this would create confusion on when HASQARD is required and when it is not. Joan added that the WCH approach has been aimed at ensuring all data are produced under the same quality assurance system to attempt to obtain comparable data regardless of who produced the data.

The history behind the development of DOECAP was discussed. The DOECAP is the latest in an evolution of a consolidated (or shared) laboratory auditing programs that DOE developed after an Inspector General (IG) report criticized DOE for the duplication of effort that was occurring due to every DOE Contractor performing their own QA audits at commercial laboratories. The IG felt that there were insignificant differences between the lines of inquiry being investigated in the audits to justify the duplication.

Joan Kessner suggested that if WRPS is attempting to utilize the DOECAP to approve laboratories as a cost savings measure, where WCH has also conducted a HASQARD audit at a laboratory the DOECAP approval could be used along with a desk review of the WCH HASQARD audit. That is, HASQARD audits performed by WCH can also be utilized by other contractors’ supplier evaluation programs.

Glen Clark mentioned that WRPS is currently only using commercial laboratories for Industrial Hygiene (IH) analyses. The HASQARD is not applicable to IH analyses. However, some of the vadose zone samples that have gone to the commercial laboratories in the past are expected to be collected again soon and the analyses conducted on these samples are applicable to HASQARD.

Larry Markel stated that he needs to take the input provided by the Focus Group during this discussion and determine the best approach to take for ensuring WRPS conformance with their customers’ requirements. Glen

Clark also stated his intent to take the input provided and reconcile the WRPS QAPD to the way HASQARD is being implemented.

Huei Meznarich mentioned that as Revision 4 of HASQARD was being developed, the Focus Group made a conscious decision to do “gap analyses” to address QA requirements that are in the QSAS and not in HASQARD. Where the Focus Group felt the HASQARD would be improved by adding QSAS requirements, they have been added in the draft of Rev. 4 of HASQARD. Huei suggested that the Focus Group should look at it the other way next. That is, look at what is in HASQARD that is not also required by the QSAS. These gaps would need to be filled by a HASQARD audit because they would not be addressed in a DOECAP audit to the QSAS.

Cliff Watkins agreed that this would be a valuable effort but should be saved until Rev. 4 of HASQARD is approved and issued. This would allow the gaps between QSAS and HASQARD to be determined using the HASQARD after those elements of the QSAS accepted for inclusion in Rev. 4 of HASQARD by the Focus Group are present in the HASQARD document.

The Focus Group Chair asked if there was any additional new business. No requests to consider new business were made. After hearing no additional new business, the Chair suggested the meeting was complete. Hearing no objections, the Focus Group Chair adjourned the meeting at 3:07 PM.

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