

HASQARD Focus Group
Meeting Minutes
March 19, 2013

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:06 PM on March 19, 2013 in Conference Room 308 at 2420 Stevens.

Those attending were: Huei Meznarich (Focus Group Chair), Cliff Watkins (Focus Group Secretary), Jeff Cheadle, Glen Clark, Scot Fitzgerald, Shannan Johnson, Joan Kessner, Larry Markel, Mary McCormick-Barger, Karl Pool, Dave St. John, Steve Smith, Noe'l Smith-Jackson, Chris Sutton, Steve Trent, Rich Weiss and Eric Wyse.

- I. Huei Meznarich requested comments on the minutes from the February 26, 2013 meeting. The Focus Group Secretary highlighted the comments he had received since sending out the draft minutes for review. No HASQARD Focus Group members present stated they had any additional comments on the February 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. At the February meeting the fact that the WRPS QAPD did not require HASQARD flow-down to commercial laboratories was discussed. Between the February and March meetings, Glen Clark provided a proposed revision to the Introduction to Volume 1 that would specify that HASQARD was the standard for environmental analyses conducted by laboratories operated by Hanford Site contractors and adding a sentence to say: "For analytical services provided by subcontracted commercial laboratories in support of the Hanford Site environmental clean-up mission, contractors are responsible to flow down and verify implementation of the quality requirements stipulated in their contracts with DOE and as described in their Quality Assurance Programs." This language was forwarded to the Focus Group for comment. The language proposed by Glen was discussed.

Rich Weiss spoke to say he was totally against Glen's proposed revision to section 1.0 of Volume 1. Rich believes it functionally guts the intent of the section. Rich stated the purpose of HASQARD is best summed up in the text found in Volume 1, Section 1.0 that says:

“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 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.”

Rich stated that HASQARD is the analytical “rock” from which all services should begin. It has been that rock for over 20 years. You cannot have two “standards.” Rich also recognized the need for exceptions. Rich recalled that there was an adequate exception clause but couldn’t find it in Rev. 3. Appropriate text did exist in Revs.1 & 2 (and probably Rev. 0 as well). Here is the useful text from Rev. 2 with some minor revisions to better fit the current need:

“The HASQARD QA/QC model supports the site cleanup mission. It recognizes a graded approach which bases the level of quality control in procedures and practices for data collection based upon the intended use of the data and the degree of confidence needed in their quality. The HASQARD will be used for all analytical/field work except as modified by client/project-specific DQOs/DQRs. In that case, clear written instructions must be received from the client and, field/laboratory concurrence must be obtained prior to submission of samples. It is recommended that the client work with the appropriate regulator or other affected stakeholders to establish required alternate quality criteria and to obtain approval. The client and the laboratory should then agree on the analytical approach to implement the unique quality requirements.”

Rich believes this proposed language fits reasonably well at the bottom of section 1.1. Rich provided the Secretary with a file with the added text and strongly recommended its inclusion. The specification of DOECAP as a client/project specific set of data quality requirements (DQRs) is within the scope of this text.

Rich added one more related comment on all this, HASQARD per se does not specify the use of on-site assessments (audits such as HASQARD-based or DOECAP-based) to establish/measure compliance to criteria. It simply requires; “Prospective suppliers shall be evaluated and selected on the basis of specified criteria. Processes to ensure that approved suppliers continue to provide acceptable items and services shall be established and implemented.” Audits are one tool and the information can be

used both directly and indirectly. Because of this language in HASQARD, the use of DOECAP audits to approve laboratories is not specifically prohibited by HASQARD.

Although not present at the February meeting, Noe'l Smith-Jackson reviewed the minutes of the February meeting where the matter of the WRPS QAPD not requiring a HASQARD specific audit was discussed. After reviewing those minutes, she sent the Focus Group a request for information regarding auditing practices for Hanford site contractor laboratories versus commercial laboratories. Input was received from the Focus Group members and discussed in the meeting.

Glen Clark stated DOECAP is not required for the on-site laboratories and also stated that based on a letter received from DOE-HQ, WRPS felt they had been directed by DOE-ORP to utilize the DOECAP system to audit commercial laboratories. Mary McCormick-Barger stated that she had discussed this with the ORP QA Manager, Jeff May. Jeff instructed Mary that if HASQARD is referenced in the WRPS contract, a letter from DOE-HQ cannot be used to override a contract requirement without a formal contract change coming from the Contracting Officer. Mary McCormick-Barger asked that rather than revise Volume 1 of HASQARD at this time that she and Glen discuss this matter separate from the Focus Group meeting and determine an appropriate path forward.

Steve Smith stated that he had discussed the letter received from DOE-HQ encouraging use of the DOECAP audits with his contracts personnel. The contracts personnel stated that they had also received a letter from DOE-RL encouraging use of the DOECAP audits. This letter was apparently signed by DOE-RL environmental organization personnel and had neither Contracting Officer direction nor anyone from DOE-RL QA on the signature of the letter. Therefore, CHPRC has taken no action on this and continues to flow-down HASQARD for all environmental analytical services performed.

Huei Mezmarich reminded the group that when Al Hawkins reinstituted the HASQARD Focus Group, one of the goals was to evaluate HASQARD against the DOECAP audit program. This meant evaluating HASQARD against the QA standard used by DOECAP, the QSAS. This has been done in the efforts to produce Revision 4 of HASQARD.

Steve Smith commented on Glen Clark's proposed revision to

HASQARD Volume 1 by saying that the Focus Group cannot put anything into HASQARD that is in conflict with one or more contractor's contract.

Chris Sutton stated that his samplers are required to go through MSA (WSCF) to obtain analytical services. When samples cannot be analyzed at WSCF due to insufficient capacity or capability to perform a required test, the analyses are subcontracted through MSA to commercial laboratories. Huei Meznarich stated that MSA uses the laboratories that have been approved on the ESL list. There are only four commercial laboratories on the ESL list and these four commercial laboratories have been used by Hanford contractors since 1990. WCH has conducted HASQARD audits at these four laboratories.

The history of the HASQARD and DOECAP programs was discussed. The precursor of the HASQARD was developed in the 1990s well before the first development of the QSAS precursor which was called the Environmental Management Consolidated Audit Program (EMCAP). The EMCAP was transitioned to the Office of Environment Safety & Health's Office of Quality Assurance Program (EH-31) in 2004 and subsequently became DOECAP. The scope of DOECAP is primarily to audit commercial laboratories that produce analytical data for multiple DOE sites. DOECAP also audits the commercial mixed and low-level waste treatment storage and disposal facilities.

Noe'l Smith-Jackson asked if any of the on-site laboratories anywhere in the DOE system are audited by DOECAP. Several personnel in the group were knowledgeable of the DOECAP operations and provided input that none of the Hanford site laboratories have been audited by DOECAP. A DOECAP audit is not required for any laboratory to be utilized by a DOE contractor (including the Hanford site contractor operated laboratories). DOECAP is simply a cost savings initiative developed by DOE-HQ (and initially run out of Oak Ridge) to reduce the number of redundant audits being performed. While primarily focused on commercial laboratories, there are DOE contractor-operated laboratories (e.g. at Oak Ridge and Portsmouth) that have had a DOECAP audit. Noe'l then asked to be certain whether WRPS is conducting HASQARD audits for their commercial laboratories. Glen Clark stated they are not. Huei Meznarich added that we should utilize the WCH audits and not create a situation where every site contractor has to be funded to independently conduct HASQARD audits at commercial laboratories.

An inquiry was made concerning the role of the MSA Acquisition Verification Services (AVS) organization in the supplier evaluation process for commercial laboratories. The Group members present indicated that AVS does not perform HASQARD audits (except when leading audits at the Hanford contractor laboratories). Chris Sutton stated that AVS does use HASQARD as part of their approval process for special projects. He did not specify if this was specific to Hanford Contractor laboratories only or all laboratories they are approving.

Karl Pool asked how the contractors are assessing any differences between the QSAS and HASQARD if they are using DOECAP audits as the basis for approval. Huei Meznarich stated that HASQARD audit information was shared with Hanford contractors when requested.

Noe'l Smith-Jackson asked if all the contractors are using the same off-site commercial laboratories. Huei Meznarich stated that she believes that except for some specialized analyses required by the CHPRC Groundwater program, there are only four off-site laboratories being used and WCH has audited all of them.

Karl Pool stated that a statement from the different contractors should be sought that specifies which laboratories are used for environmental testing, how they are approved and how it is assured that the flow-down of requirements to those laboratories includes conformance to HASQARD. Glen Clark stated that as of right now, WRPS is not flowing down HASQARD to the commercial laboratories.

Larry Markel stated that this is the case because the intent was to follow the DOE-HQ guidance to recognize DOECAP and not duplicate efforts in auditing laboratories. The WRPS attorneys and contracts folks did not catch the fact that the DOE-HQ letter was in conflict with the contract requirement to comply with HASQARD. So, when the DOE-HQ letter was received, no reply was made by WRPS to DOE-ORP asking DOE to remove HASQARD from their contract in order to comply with the request. Rich Weiss stated that when the DOE-HQ letter was received by WCH, their contracts people asked DOE for a definitive answer on the conflict between honoring the DOECAP audits (and therefore not assessing the commercial laboratories' compliance with HASQARD) versus doing HASQARD audits and not recognizing DOECAP. No definitive response was ever received from DOE, so WCH continues to assess laboratories to HASQARD. Larry Markel recalled verbal guidance being received from DOE-RL saying that DOECAP shall be used for commercial laboratories off the Hanford Site. The letter received stated "Duplicative audits by the EM offices or programs or their subcontractors are prohibited."

The Focus Group Secretary inquired whether Noe'l Smith-Jackson's questions on this subject had been answered. Noe'l indicated she believed so and that she would take this input back to discuss with the Ecology chemists. The Secretary asked if there were any actions associated with the proposed revision to Section 1.1 of Volume 1 as a result of this conversation. Rich Weiss suggested waiting until WRPS decides if a revision is needed to support the way they will do business as a result of the meeting they will have with DOE-ORP QA personnel. Mary McCormick-Barger stated that if DOE approved a QAPD that was in conflict with the contract, that was an error on their part. As stated earlier, DOE-ORP will meet with WRPS personnel to resolve this. Glen Clark stated that WRPS may need to add language in their commercial laboratory contracts that says the QA requirements for analysis are based on HASQARD, but WRPS recognizes DOECAP audits as an appropriate supplier evaluation/approval process. Mary McCormick-Barger requested that we revisit the need for a revision to Volume 1 in the next Focus Group meeting.

- b. Because it was felt that the sampling personnel present were only interested in the discussion scheduled to take place on Volume 2, other topics associated with production of Volume 1 were tabled for later in the meeting and the status of the preparations of Revision 4 for Volume 2 was discussed.

Prior to the meeting, Steve Trent provided the Focus Group Secretary with an electronic final draft of Volume 2. This file was distributed to the Focus Group to allow them time to review the document and be prepared with comments for the March meeting. The Secretary projected the electronic version of Volume 2 on the screen and went page by page through the document to allow comments to be discussed.

Huei Meznarich asked about a paragraph in Section 2.1 "Implementation of Planning Process" that has been written:

"Each prime contractor at the Hanford Site shall have a quality assurance plan and/or procedure(s) which address the use and documentation of DQOs. Further, each prime contractor at the Hanford Site shall have a quality assurance plan and/or a standard operating procedure (SOP) which addresses the use, content, and format of SAPs. Each commonly used sampling method performed in the field shall have an applicable SOP describing the necessary equipment and collection steps for the media and contaminant to be sampled. Unique sampling methods may be described in the SAP document(s) to accommodate unusual field conditions or limitations imposed due to safety considerations or to technical data needs."

Huei questioned whether this was required for all prime contractors as she was not aware of an MSA quality assurance plan and/or procedure(s)

which address the use and documentation of DQOs. The Focus Group members stated that this was the Volume applicable only to sampling and that if MSA does any field sampling they should have some kind of QA plan and procedures to address the requirements specified in the subject paragraph.

In Section 4.4.6, “Sample Handling and Transfer” a sentence was revised. The original sentence said: “Custody seals or tape shall also be applied to the sample shipping container prior to transport or during temporary storage during work breaks to verify that sample integrity has been maintained.” Huei Meznarich pointed out that not all samples received at WSCF come with custody seals or tape on the shipping containers. The Focus Group members present agreed and the sentence was revised to say: “Custody seals or tape shall also be applied to the sample shipping container prior to off-site transport or during temporary storage during work breaks to verify that sample integrity has been maintained.”

In Section 4.4.6, Eric Wyse noted that one sentence that had contained a “shall” requirement was changed to a “should” option. This sentence said, “The container ~~shall~~ should be placed in a plastic bag to ensure that the outside of the container does not become contaminated.” The group determined alternative wording to allow flexibility but maintain a requirement to prevent contamination by revising the sentence to say: “Precautions shall be taken to ensure that the outside of the container does not become contaminated (e.g., placing the container in a plastic bag or some other protection).”

No other significant comments were made by Focus Group members present at the meeting. The Focus Group believes that Volume 2 is ready for final review and publication. The Secretary will save the current final draft and send one version out showing changes tracked and one version showing all changes accepted. The Focus Group will review Volume 2 prior to the next Focus Group meeting and any comments will be discussed. After that, the document will be sent to a technical editor for preparation for publication.

- c. Returning to outstanding topics associated with Volume 1, the suggestion to incorporate 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) as an Appendix in Volume 1 was discussed:

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*.” At the February Focus Group meeting it was stated that because Ecology has indicated they feel

some of the text in the 94-97 document is relevant to highly radioactive samples at Hanford, the Focus Group 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 believed 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 the 94-97 document to Word format, reconciled errors generated during the electronic file conversion brought the file to the Focus Group meeting to project for comment.

Rather than revise the document into wording to be used in an Appendix, the Focus Group discussed the merits of the 94-97 document. Jeff Cheadle stated that the 94-97 document was not in the WRPS or ATL contracts, but when shown to 222S laboratory personnel was felt to be useful.

One line of thinking was that regardless of the fact that the document has been “retired” by DOE and contains outdated references to the Tri-Party Agreement and the Hanford Analytical Services Quality Assurance Plan (HASQAP), it still meets the need for which it is referenced in Volume 1. Specifically that it provides “guidance in understanding when a particular method qualifies as a required regulatory method.” One of the Focus Group members asked if the document could still be found in IDMS and Glen Clark stated that it is in IDMS. One of the Focus Group members present stated that because it is only referenced as guidance now, and the nine instances when specific method are required can always be found elsewhere, there may be no need to reference it at all.

Noel Smith-Jackson suggested that the reference to the 94-97 document be retained in HASQARD and the 94-97 document be “unretired.”

Steve Smith stated that if the document does not specify QA requirements and that all pertinent material related to QA associated with high radioactivity samples has been incorporated elsewhere in HASQARD, there is no need to reference the 94-97 document in HASQARD.

Jeff Cheadle suggested that the reference to the 94-97 document be retained to provide guidance in understanding when a particular method qualifies as a required regulatory method but acknowledge that the document is retired when referencing it in HASQARD. Glen Clark pointed out that the 94-97 document is in IDMS and is not indicated as “cancelled” or “retired.” Eric Wyse stated he wasn’t sure that it was appropriate to reference a retired document.

Huei Meznarich pointed out that the language in the 94-97 document

provides a basis of understanding between DOE and the Regulators on when a specific method is required and what can/will be done when meeting the requirements of that method are not safe due to radioactivity in the sample. For this reason, it benefits the contractors to retain this document (or the pertinent information from this document) in some form. Rich Weiss agreed that while it may be cancelled, the 94-97 document provides useful references to a process to follow when method and/or method QC requirements need to be revised due to radioactivity concerns. Rich suggested that the Appendix be written with an introduction acknowledging the fact that the material comes from a cancelled document and the entire document is not reproduced in the Appendix, just those portions relevant to analytical method and/or QC modifications. Glen Clark suggested that any 94-97 document requirements incorporated in HASQARD should have a footnote to reference the source of the requirement.

Noel Smith-Jackson stated that if DOE-ORP has additional questions about Ecology's desire to retain the 94-97 document, or at least capture the pertinent material somewhere, they should discuss it with Jeff Lyon at Ecology.

The Focus Group Chair recognized that the discussion of the 94-97 document had lasted long enough to preclude any additional items on the agenda to be discussed. Focus Group members started leaving the meeting at 4:00 and continued to do so from that time through adjournment. Rather than end discussions on the 94-97 document, the Focus Group Chair allowed conversation to continue amongst Focus Group members that remained in the meeting. The meeting was adjourned at 4:45 PM.

The next meeting is scheduled for April 16, 2013 at 2:00 PM in 2420 Stevens, Room 308.