

**HASQARD Focus Group**  
Meeting Minutes  
May 21, 2013

The meeting was called to order by Huei Meznarich, HASQARD Focus Group Chair at 2:00 PM on May 21, 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, Joan Kessner, Larry Markel, Mary McCormick-Barger, Noe'l Smith-Jackson, Chris Sutton, Steve Trent, Rich Weiss and Eric Wyse.

- I. Huei Meznarich requested comments on the minutes from the April 16, 2013 meeting. Mary McCormick-Barger stated she had comments regarding the way statements she made were recorded in the draft minutes. The Secretary took an action to work with Mary after the meeting to confirm her comments were accurately incorporated in the April meeting minutes. The minutes for the April meeting were approved contingent upon completion of the Secretary's action.
- II. A discussion of the latest comments requiring resolution to complete Revision 4 of HASQARD was held:
  1. The Focus Group discussed the non-editorial comments on Volume 2. Steve Trent provided his resolutions to the comments. Very few issues were raised that could not be resolved by the Focus Group members present during the meeting. The items requiring attention before final editing include:
    - In Section 4.3.1, "Sample Containers for Highly Radioactive Samples," a sentence was removed that said: "When headspace is observed in a sample, the information will be noted in the analytical report." A comment was made that the Secretary should ensure the need to include information on samples received with headspace issues in data reports in Volume 4.

**NOTE:** Following the meeting, the Secretary added text to Sections 3.3 and 5.3.1 in Volume 4 to address this action. This text will be considered when the final review of Volume 4 is conducted.

    - In Section 4.4.7, a sentence reading, "Regulations for classifying, describing, packaging, marking, labeling, and transporting hazardous materials, hazardous substances and hazardous wastes

are enforced by the Department of Transportation (DOT) as described in 49 CFR, Parts 171 through 178” has a comment associated with it stating that Mike Baechler needs to address whether the Parts referenced are correct.

**NOTE:** Following the meeting, Steve Trent indicated that Mike Baechler was consulted and the comment can be removed.

- Section 4.6, “Field Changes” will be aligned with the change control process in Volume 1 once Volume 1 is finalized.
  - The Table in Appendix A, “Recommended Preservation, Container, and Hold Time Guidelines” contains several references to cooling samples to 6 degrees Celsius. The table in the Appendix had been changed to remove “@ ≤” prior to “6°C” in the table. The Focus Group members present felt that the ≤ symbol in the table was relevant and appropriate. Because the Focus Group also spent time discussing language in Section 4.4.6 of the document related to overcooling samples, they felt adding the ≤ symbol back to the table would be appropriate. The Secretary took the action to ensure the ≤ symbol was reinserted to the applicable references in the Appendix.
2. The Focus Group discussed the most recent comments (and resulting revisions) to HASQARD Volume 1.
- The Focus Group discussed the sentence in the introduction stating, “The HASQARD establishes quality requirements in response to DOE Order 414.1C, *Quality Assurance*.” Initially, this sentence had been removed from Volume 1 entirely. Eric Wyse stated that the HASQARD is a DOE document and the DOE Order addresses QA, not necessarily NQA-1, but any DOE QA document should be consistent and compliant with DOE Order 414.1C. After discussing the fact that some of the Hanford Contractors have now been required to comply with DOE Order 414.1D, the Focus Group members present agreed that the sentence should be revised to say, “The HASQARD establishes quality requirements in response to DOE Order 414.1C or 414.1D, *Quality Assurance* (as applicable).” The discussion also included mention of the DOE Order 414.1C and 414.1D Contractor Requirements Document requirements to use an appropriate national or international consensus standard consistent with contractual and regulatory requirements and to clearly identify which standards or parts of standards are used. Chris Sutton stated that the Tri-Party Agreement (TPA) says that U.S. Environmental Protection Agency

(EPA) documents are to be the basis of QA documents supporting environmental sampling and analysis at the Hanford Site. This TPA provides the “regulatory requirements” for the EPA QA standards (e.g., *EPA Requirements for Quality Assurance Project Plans*, *EPA QA/R-5*, EPA/240/B-01/003) being implemented through HASQARD and meets the requirements of DOE Order 414.1C and 414.1D. To ensure that the reader recognizes the tie to the TPA requirements, the Focus Group added a sentence to the end of the same paragraph where DOE Order 414 is mentioned that states: “In addition, the HASQARD satisfies the requirements from the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) (TPA) (Ecology et al 2002) Article XXXI and the TPA Action Plan, Sections 6.5 and 7.8.”

- The Focus Group was working from an electronic version of Volume 1 prepared by Steve Smith who could not be at the meeting to discuss revisions he had made. As a result, the first two sentences in the second paragraph in the Introduction were revised from the Steve’s proposal. The original language reviewed said, “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 (meaning any and all subcontracted work related to the cleanup mission as described in this document) and covers both radiological and non-radiological analyses.” The revised language agreed to in the meeting is, “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 services performed by contractors, subcontractors and/or commercial laboratories and covers both radiological and non-radiological analyses.”
- The revisions Steve Smith had proposed included a significant amount of material drawn from the TPA in Section 1.1, “Scope.” The Focus Group members present felt that this material was best referenced in Section 1.0 and moved the reference to the sections as described above. The Focus group members present felt that the QA references and guidance documents listed in Volume 1, Revision 3, Section 1.0, and proposed for removal by Steve Smith should be retained. However, after discussing the language in the sentence that introduced the list of references, the Focus Group members present tentatively agreed to change the sentence from, “Sample collection design and the field and laboratory analyses detailed in Volume 2, 3 and 4 are also based on:” to “Some requirements for sample collection design and the field and

laboratory analyses detailed in Volume 2, 3 and 4 were drawn from.” During this discussion, Mary McCormick-Barger pointed out that the reference to, “The American National Standards Institute (ANSI) N42.23-1996, *American National Standard Measurement and Associated Instrumentation Quality Assurance for Radioassay Laboratories*” may have been replaced by an Institute of Electrical and Electronics Engineers (IEEE) standard. Huei Meznarich took an action to determine if this is the case. A question was asked on what the DOE Consolidated Audit Program (DOECAP) uses as the basis for radiochemical analyses in the Quality System for Analytical Services (QSAS). Rich Weiss stated that most of the DOECAP comes from the QSAS which defines things not contained in any standard, but some things (e.g., gamma spectrometry calibration criteria) come from the ANSI Standard rather than any IEEE standard. The need to reference Multi-Agency Radiological Laboratory Analytical Protocols (MARLAP) manual was raised and Huei Meznarich pointed out that this reference is provided as guidance in HASQARD. Mary McCormick-Barger asked if there was a driver requiring Hanford to implement the ANSI 42.23 standard. Huei Meznarich and Joan Kessner explained at the time HASQARD (and its predecessor HASQAP) were developed, there were no specified requirements for radiochemistry. There still are no drivers in the TPA specifying where radiological measurement QA is to be derived, so the DOE has to draw from the references available to implement good practices. This is the basis for the reference to the ANSI 42.23 standard.

- Volume 1, Section 1.2, “HASQARD Revisions” was discussed. The language in the section from Revision 3 is not reflecting the current practice (i.e., there is no HASQARD email address with an electronic mailbox for submitting comments or questions). It was agreed that this section needs to be revised to be consistent with current practices.
- The revisions provided by Steve Smith included a new Section titled, “HASQARD and the Quality System for Analytical Services.” This section was added because the effort to produce Revision 4 of HASQARD was started as a comparison of HASQARD to the QSAS. The desire to acknowledge that this effort was made was seen as a desirable addition to Volume 1. The fact that the QSAS will soon be phased out in favor of another QA document to form the basis of the DOECAP audits was mentioned as a possible reason to not mention the QSAS at all. However, the Focus Group members present agreed that the QSAS revision number to which the comparison was performed between

HASQARD and QSAS will be provided in this section.

- The remainder of the time in the meeting was spent discussing the material contained in Section 4.0, "Procedures." There was concern that the use of the term "procedure" was sometimes being mixed with term "method." That is, a laboratory should never deviate from a procedure. However, an EPA method can be deviated from freely as long as the laboratory can demonstrate equal performance of the method after deviation. Some Focus Group members felt that there will also be situations that arise in a laboratory where a procedure may also have to be deviated from. Therefore, the process under which such deviation can be acceptably made needs to be described and defined. Chris Sutton stated that the QA subcommittee needs to meet again with a smaller group of invested and concerned individuals and find language that is precise enough that compromise can be reached on this issue. Rich Weiss was asked for his opinion. Rich stated that he sees where there may be some holes in the current language that leads to confusion for some. Rich appreciated the different points of view reflected in the discussion held. Some of the issues are related that because it is a Nuclear Facility, the 222S laboratory has very strict requirements for conduct of operations that are not present in most other laboratories. Rich took the action to look at earlier revisions to HASQARD to determine what has changed through the years, the suggestions provide in comments on Revision 4 and try to produce a compromise for this topic.

The meeting was adjourned at 4:30 PM.

The next meeting is scheduled for June 18, 2013 at 2:00 PM in 2420 Stevens, Room 308.