

HASQARD Focus Group
Meeting Minutes
May 26, 2015

The meeting was called to order by Cliff Watkins, HASQARD Focus Group Secretary at 2:07 PM on May 26, 2015 in Conference Room 328 at 2420 Stevens.

Those attending were: Jonathan Sanwald (Mission Support Alliance (MSA), Focus Group Chair), Cliff Watkins (Corporate Allocation Services, DOE-RL Support Contractor, Focus Group Secretary), Taffy Almeida (Pacific Northwest National Laboratory (PNNL)), Glen Clark (Washington River Protection Solution (WRPS)), Fred Dunhour (DOE-ORP), Scot Fitzgerald (CH2MHILL Plateau Remediation Company (CHPRC)), George Mata (MSA), Karl Pool (PNNL), Noe'l Smith-Jackson (Washington State Department of Ecology), Chris Thompson (PNNL), Rich Weiss (Washington Closure Hanford (WCH)) and Eric Wyse (Advanced Technologies and Laboratories International (ATL)).

- I. Cliff Watkins stated that in accordance with the HASQARD Focus Group Charter, the Contractor having contractual responsibility for coordination of HASQARD, MSA, is to nominate the Focus Group Chair at the October meeting. Because there has not been a Focus Group Meeting since June 2014, the Secretary stated this meeting will be used to complete activities required by the Charter. The Secretary stated that the QA Manager at MSA has nominated Jonathan Sanwald to serve as the Focus Group Chair and voting member for MSA. Two of the voting members (Joan Kessner-WCH and Joe Archuleta-CHPRC) were not present at the meeting, but two Focus Group members present from the companies the absent members represent (Rich Weiss and Chris Sutton) stated they were delegated voting authority for this meeting. The Secretary requested a vote from the voting members concerning the nomination of Jonathan Sanwald to serve as Focus Group Chair. By unanimous vote, Jonathan Sanwald was elected to serve as the HASQARD Focus Group Chair for FY 2015.

- II. The Secretary requested input on whether in the contracts for the various members of the Focus Group that were present have been formally modified to require implementation of Revision 4 of HASQARD. Jonathan Sanwald stated that MSA has implemented HASQARD Rev 4. The representatives from all the remaining companies reported that DOE-RL (or DOE-ORP as applicable) has not transmitted formal direction to implement HASQARD Rev 4. All companies have received a letter requesting a statement on the impacts of implementing Rev 4 and have replied, but none have seen a letter requiring implementation. The DOE-ORP representative present, Fred Dunhour, stated that this is being worked at DOE-ORP and that he anticipates letters requiring implementation of HASQARD Rev 4 in the WRPS contract to be sent out within the next month. The representative from

WCH stated that it is possible that with the one-year extension to the contract recently awarded to WCH whether a provision to not implement any new DOE Orders or revised requirements documents was part of that award. The Secretary took action to determine the status of letters directing the DOE-RL contractors to implement HASQARD Rev 4.

- III. Glen Clark asked if the audit checklists for HASQARD have been updated by anyone to reflect the HASQARD Rev 4 requirements. Glen stated that Carl Wallskog at the MSA Acquisition Verification Services (AVS) organization has conducted the HASQARD audits in the past and, as part of that responsibility, have updated the checklists when an audit to the HASQARD has been scheduled. Because Carl is no longer working for MSA, Glen was inquiring to determine if this had been assigned to someone else. Jonathan Sanwald stated that an AVS audit of the 222S laboratory is coming up soon, so this will need to be addressed before that happens. The checklist will need to be revised if DOE-ORP has directed ATL to implement HASQARD Rev 4 at the time of the audit. Glen stated that the WRPS personnel would be willing to help the effort of revising the checklists, but did not want to duplicate an effort if it has been done by someone already. Jonathan Sanwald stated that he will begin looking at revising the checklists regardless of the immediate need for the 222S audit since the revised checklists will be needed eventually. Chris Sutton stated that someone should contact Joe Archuleta because he may have begun revision the checklists also. Rich Weiss also offered to support the effort of revising the checklists even though it is not clear if WCH will ever be required to implement HASQARD Rev 4.
- IV. The remainder of the meeting was spent discussing comments that have been received by the Secretary (and subsequently forwarded to the Focus Group for consideration) concerning the language present in the published version of HASQARD Rev 4. The comments ranged from editorial issues that are easily corrected to technical issues that required discussion. Some language in HASQARD Rev 4 may be present due to compromises made as the document was produced. The Secretary projected an electronic version of the final version of HASQARD Rev 4 requested that the Focus Group to first look at these comments and come to an acceptable resolution. The resolutions to the comments were added to an electronic version of the document using "Track Changes." These revisions will be retained and used as a starting point if/when HASQARD Rev 5 is being developed. As a secondary matter, the Secretary asked the Focus Group to consider whether any revision being made at the meeting is so significant that a de minimis change needs to be posted on the HASQARD web site. These minutes do not detail how all comments (e.g., simple editorial revisions) were addressed by the Focus Group. Rather, a summary of the more technical discussion and any unresolved matters follows:

- a. A comment was received stating that in Volume 1, the 6th paragraph of Section 4.5 seems to have redundancies with the topic discussed in Section 4.7. The end of the paragraph in question refers to section 4.7 with the implication that what's there is a related but different topic, but not before saying a lot of what is then repeated in section 4.7. After reviewing the content of both paragraphs mentioned in the comment, the individual that submitted the comment took action to revisit the concern and determine if it was valid.
- b. The Focus Group members present agreed to change the words "Preventive action" to "Actions to prevent recurrence" at the beginning of the second sentence of Volume 1, Section 5.4.
- c. The Focus Group members present agreed that language found in Volume 1, Sections 6.0 and 6.2 may be redundant and some or all of Section 6.2 may be able to be eliminated when HASQARD Rev 5 is produced. Because the redundancy causes no issues with implementation of HASQARD Rev 4, the possibility of deleting the paragraph was retained as a comment in the electronic version of the file being generated by the Secretary.
- d. The Focus Group members present agreed that the first sentence of Volume 1, Section 10.3 should be revised from (underlines added to highlight where the words were rearranged): "Quality system assessments shall be carried out by personnel independent of those having sufficient authority having direct responsibility for the activity being evaluated and that are qualified and knowledgeable about the area to be assessed in accordance with their program." to "Quality system assessments shall be carried out by personnel having sufficient authority and independent of those having direct responsibility for the activity being evaluated and that are qualified and knowledgeable about the area to be assessed in accordance with their program."
- e. The Focus Group members present agreed that much of Volume 1, Section 10.5 is already stated in Section 10.0 and the section should be evaluated for deletion. It was pointed out that because the topics of paragraphs 10.1, 10.2, 10.3 and 10.4 are listed as bullets in Section 10.0, it was likely that Section 10.5 was retained for consistency regardless of its redundant content. Because the redundancy causes no issues with implementation of HASQARD Rev 4, the possibility of deleting the paragraph was retained as a comment in the electronic version of the file being generated by the Secretary.

- f. Volume 4, Section 6.4.2 contains a note that is causing a technical issue. The note states, "NOTE: The laboratory must be capable of achieving an EQL less than or equal to 10 percent (for cyanide, hexavalent chromium, and IC) or 50 percent of the decision level or must negotiate an acceptable alternative. All affected samples in the preparation batch will be re-prepared and analyzed if the preparation blank (method blank) fails to meet the acceptance criteria." The issue was presented by Scot Fitzgerald who pointed out that no laboratories they are using can achieve an EQL of 10% of the decision level for hexavalent chromium. Chris Sutton noted that for some constituents, Ecology is using the statistical mean of the EQLs reported by accredited laboratories for clean-up level. This practice results in about 50% of all accredited laboratories not being able to achieve an EQL that provides usable data. Rich Weiss took action to look into the language in the Note and come back to the Focus Group with a proposed resolution.
- g. Several of the tables in Volume 4 have corrective action statements that are very similar (or equivalent) but are worded differently. The Focus Group members present agreed that standardization of this language would be beneficial for HASQARD Rev 5.
- h. Several instances of sentences where requirements were expressed with a "should" rather than a "shall" were revised to change the optional nature of the activity to a mandatory requirement (e.g., re-establishing gas chromatography retention time windows after a column is changed).
- i. In Volume 4, the position of words within a sentence and the position of entire sentences within paragraphs were revised to add clarity but having no change in the base requirements expressed in the revised sentence and/or paragraph.
- j. In discussing Volume 4, Table 6-3, the Focus Group added a note that gaining consistency with the quality control (QC) requirements for inductively coupled plasma/mass spectrometry (ICP/MS) methods stated in SW-846 method 6020A was desirable either as a de minimis change or to address when producing HASQARD Rev 5. Prior to the meeting, the Secretary received a note from the former Chair of the Focus Group saying the differences between 6020A and Table 6-3 were intentional.
- k. Also in discussing Volume 4, Table 6-3, the Focus Group was asked whether the ion selective electrode QC acceptance criteria for the initial calibration verification (ICV) and continuing calibration verification (CCV) stated, "Based on long-term statistical performance or 90 to 110% as applicable" is accurate. The question was based on the fact that

statistical process control is usually used for prepared standards not for instrument QC. It was stated that instrument QC should have administrative limits specified based on expected performance. With no clear resolution of this matter, the Focus Group members present agreed to table this issue until someone can research why this statement was made in Table 6-3. A comment was added to the electronic copy of the document to ensure the issue is not lost.

- l. The Focus Group members present agreed that the definition of the term “sample” would help when generating HASQARD Rev 5. This is because the frequency for performing certain QC operations is often expressed in terms of how many samples have been analyzed and it is not clear if that frequency is to include QC samples (e.g., matrix spike samples) in that count of samples.

- m. In discussing a comment on the first paragraph of Volume 4, Section 6.5.5, Internal Standards, the Focus Group members present agreed that a comment should be added to the electronic file to ensure the wording of the last sentence is addressed. The last sentence currently reads: “Internal standards are used as the basis for quantitation of the target analytes of interest.” The comment in the file for consideration for HASQARD Rev 5 states, “Consider rewording to: Internal standards can be used as the basis for quantitation of the target analytes of interest, or used to normalize instrument response to correct for drift.”

- n. In discussing a comment on the first sentence of the last paragraph of Volume 4, Section 6.5.6, Low Level Standard, the Focus Group members present agreed that the recovery limits specified are inconsistent with some published methods. Therefore, it was agreed that the sentence should be modified to say (underline added to identified additional verbiage), “If not specified by the method, a recovery between 70 and 130 percent is recommended.”

- o. In discussing Volume 4, Table 6-8, it was agreed that a comment should be added to the electronic version of the document being used to track changes to be included in HASQARD Rev. 5 to ensure the corrective action statement associated with QC failure of the ICV and CCV is changed from “Rerun previous 15 samples” to “Rerun all analyses since the last CCV (or ICV) that met QC acceptance criteria.”

- p. In discussing Volume 4, Section 7.7, Control Charts, it was stated that one of the ATL radiochemists had pointed out that a counter control sample is not used to verify calibration in the same way a CCV is. This was in reference to the sentence in Section 7.7 that states, “Radiochemical

laboratories shall also monitor calibration verification standards (i.e., counter control standard for radiochemistry).” Rich Weiss stated that this should be addressed in HASQARD Rev 5 and added that many laboratories use slightly inappropriate terms sometimes and this is one of them. A comment was added to the electronic version of the document to ensure this matter is addressed while producing HASQARD Rev 5.

- q. Another Focus Group member present mentioned that in some places HASQARD Rev 4 calls out a specific number of standards that must be analyzed (e.g., the Table 4-5 calibration criteria for hydride atomic absorption (arsenic and selenium) specifies, “Blank and five standards.”). The Focus Group members present agreed that unless there was a technical basis for a specific number of standards, future revisions of HASQARD should state, “Blank and a minimum of five standards” in these situations.
- r. Rich Weiss discussed an issue he was having recently with dual column GC analyses for polychlorinated biphenyls (PCBs) and polyaromatic hydrocarbons (PAHs). In conducting dual column analyses, HASQARD does not specify which of the two concentrations determined by the two columns is to be reported by the laboratory. Also, HASQARD is silent on if the data are to be flagged if the relative percent difference (RPD) between the two results exceeds a threshold. In the SW-846 method 8000, it states that in dual column methods if the RPD is >40%, then the data are flagged and reported. However, HASQARD has nothing. No action was taken as a result of this discussion. NOTE: During preparation of these minutes the Focus Group Secretary has placed a comment on Volume 4, Table 6-7 to remind the Focus Group to account for this when producing Rev. 5 of HASQARD.

The Focus Group discussed the frequency at which Focus Group meetings should be held. A date for the next meeting was not proposed or scheduled. It was stated that meeting quarterly would be a good idea to ensure matters such as those addressed in this meeting could be discussed more proactively as they come up. The Secretary took the action to obtain a conference room and propose a meeting date that will likely be in August. The meeting was adjourned at 4:17 PM.