

HASQARD Focus Group
Meeting Minutes
January 26, 2016

The meeting was called to order by Jonathan Sanwald, HASQARD Focus Group Chair at 2:05 PM on January 26, 2016 in Conference Room 308 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)), Jeff Cheadle (DOE-ORP), Glen Clark (Washington River Protection Solution (WRPS)), Fred Dunhour (DOE-ORP), Scot Fitzgerald ((CH2MHILL Plateau Remediation Company (CHPRC)), Joan Kessner (Washington Closure Hanford (WCH)), Judy McCluskey (Wastren), Karl Pool (PNNL), Matt Romano (WRPS), Noe'l Smith-Jackson (Washington State Department of Ecology), Chris Sutton (CHPRC), Wendy Thompson (MSA) and Rich Weiss (WCH).

- I. Jonathan Sanwald requested review and approval of the meeting minutes from the last quarterly meeting of the HASQARD Focus Group held on October 22, 2015. Hearing no comments on the draft meeting minutes, the minutes were approved.
- II. Jonathan Sanwald announced that there is a new voting member of the HASQARD Focus Group. Cliff Watkins introduced Judy McCluskey, the new voting member representing Wastren and the 222S Laboratory. Judy stated that Wastren has a position posted for a QA Manager and that once placed that individual may attend HASQARD Focus Group meetings and become the voting member representing the laboratory, but for now she is in the position. Jonathan Sanwald requested all Focus Group members present to introduce themselves and provide their company name and organizational interest in HASQARD.
- III. The status of action items from the May 26 and October 22 meeting were discussed:
 - a. Jonathan Sanwald stated that he has contacted a few Focus Group members regarding preparation of an updated HASQARD audit checklist for Revision 4 of HASQARD. Taffy Almeida stated that she is working on one for PNNL's use. Jonathan Sanwald stated that he needs one to support an upcoming audit WRPS has requested. The question was asked whether a Revision 4 audit would be required for WRPS because the currently referenced revision of HASQARD in the WRPS contract is Revision 3. Fred Dunhour and Jeff Cheadle stated that the ORP Contracting Officer (CO) for the WRPS and 222S Laboratory contracts are in negotiations with WRPS and Wastren concerning facility upgrades

(weekend and overnight temperature monitoring for cold storage) that would be required to support HASQARD Rev. 4. It is likely this negotiation will not begin until February. Because of that, the WRPS requested audit of 222S should be done to HASQARD Rev. 3. Jonathan Sanwald stated that AVS can prepare a HASQARD checklist for Revision 3 very quickly. Jonathan Sanwald will continue to work with Focus Group members to compile a HASQARD Rev. 4 audit checklist.

- b. The relationship of the DOE Consolidated Audit Program (DOECAP), HASQARD and the AVS laboratory services Evaluated Suppliers List (ESL) was discussed.

Jonathan Sanwald has been comparing the DOECAP and HASQARD Rev. 3 audit checklists to determine any gaps. It was stated that the DOECAP audit checklists are being revised due to a revision in the Quality System Manual for Analytical Services (QSM) document that defines the QA criteria for DOECAP audits. Because of this, any analysis of the DOECAP audit checklists against HASQARD Rev. 3 checklists may be a moving target. Rich Weiss stated the revised DOECAP audit checklists are not likely to be finalized until at least November 2016. Rich also stated that there would likely not be a revision to the QSM, that drives the audit checklist revision, until late in fiscal year 2016. Rich believes that the changes to the QSM will not be dramatic, only a “sharpening” or more clear specification of requirements. The biggest delta AVS is dealing with is that the DOECAP QSM requires integration with another controlled document (The National Environmental Laboratory Accreditation Coalition (NELAC) Institute - *Management and Technical Requirements for Laboratories Performing Environmental Analysis*, EL-V1-2009-ISO) resulting in a complex comparison process to ensure that all appropriate criteria have been evaluated. It was stated that the differences between the DOECAP/QSM and HASQARD are mainly administrative with only a few being technical. The technical differences are mainly in the area of radiological analyses. These differences are primarily due to the different backgrounds and experiences of the authors writing the requirements found in each document. Both sets of requirements promote good science. Rich Weiss offered to interface with AVS on the development of a gap analysis between HASQARD and the QSM. Jonathan stated that he has researched it enough to find that the DOECAP audit checklists do not cover all of the HASQARD requirements.

Chris Sutton stated that because DOECAP audits are being recognized as an avenue to place a laboratory on the AVS ESL, CHPRC has ensured their Environmental Quality Assurance Plan (QAP) incorporates both QSM and HASQARD by reference to ensure either method of approving a laboratory for provision of services is consistent with their program.

Jonathan Sanwald stated that he is working with Wendy Thompson of the MSA Environmental QA group to review the MSA environmental QA documents doing a HASQARD/QSM comparison.

Glen Clark stated that his experience is similar to Rich's finding that the differences between the QSM and HASQARD are mainly administrative with a few technical criteria different. Glen's opinion is that even the technical differences are not very significant. He also stated that WRPS ensures that they audit to the known differences.

Wendy Thompson stated that MSA is working on a new analytical services contract and has been told by MSA QA management that conformance to HASQARD cannot be a requirement specified in the contract SOW. Wendy asked the Focus Group how to ensure compliance with HASQARD without being able to call it out in a contract's SOW. Chris Sutton stated he ran into the same issue and resolved it by spelling out the HASQARD requirements separately in the SOW without referencing HASQARD. The basis for not being allowed to reference HASQARD was that MSA AVS is requiring a laboratory to perform acceptably in a DOECAP audit to be added to the AVS ESL but a DOECAP audit may not always include a HASQARD "gap audit" where the difference between the QSM requirements and HASQARD are included in the audit scope. It was stated that MSA is basing their acceptance of DOECAP audits in adding laboratories to the ESL on an email note Huei Meznarich wrote to MSA QA stating that HASQARD and the QSM are generally equivalent. Rich Weiss stated that nothing in this conversation explained to him why HASQARD has to be taken out of the contract SOW. Chris Sutton stated that MSA QA management has determined that if HASQARD is required in a contract, then the laboratory must be approved based on an audit to the HASQARD requirements. Because DOE-HQ has issued policy stating that duplicative audits shall not be conducted at analytical laboratories providing the same services, and DOECAP is already auditing the laboratories, including HASQARD would result in a duplicative audit requirement. Rich Weiss stated that if a SOW has included criteria from HASQARD to cover gaps between the QSM and HASQARD, then the laboratory is approved based on DOECAP, the laboratory still isn't being audited and approved against the requirements of the contract. Several Focus Group members agreed that it doesn't make sense to spend the time and effort to prepare HASQARD just to see it scrapped and the DOECAP/QSM become the basis for laboratory assessments when placing contracts. The question was asked what drives the need to have laboratories on the ESL in the first place. Chris Sutton stated that the CHPRC Environmental QAP specifies that laboratories are procured as a Quality Level (QL) 1 procurement activity. Glen Clark stated that at WRPS, analytical services laboratories are procured at QL-3 (enhanced quality) requiring inclusion of the laboratory

on the 222-S Laboratory Approved Suppliers List (ASL). Jonathan Sanwald stated he would meet with MSA QA management to discuss this issue. This is a site-wide need because MSA QA has held this position on new laboratory contracts issued by CHPRC and now MSA. Joan Kessner asked how CHPRC and MSA think they are not required to flow down documents that are specified in their contracts to their subcontractors. Without reference to HASQARD in the contracts, there is no objective evidence (documentation) that these requirements are being transferred to sub-tier performers. This issue was amplified by Wendy Thompson who stated that HASQARD is referenced in the MSA sampling and analysis plans (SAPs) and quality assurance project plans (QAPjPs) but is barred from reference in contracts. Fred Dunhour equated this issue to the fact that while NQA-1 is in all the contractor's contracts, the contractors are not required to flow down NQA-1 to all suppliers, only as applicable. Jonathan Sanwald stated that MSA's position is that HASQARD is flowed down to subcontracted laboratories, just not by reference in contract SOWs. However, Jonathan needs to discuss the details discussed in this meeting with MSA QA management for a better explanation of the path forward. As Jonathan has become more familiar with HASQARD since becoming the HASQARD Focus Group Chair, he is starting to get a better feel for how HASQARD is being viewed and implemented by MSA. Noe'l Smith-Jackson asked who is approving the SOWs for analytical services and is MSA QA management making the decision to not include HASQARD autonomously. No definitive response to this question was provided. Chris Sutton mentioned that DOE has put a Basic Ordering Agreement (BOA) in place for analytical services and any site can request services using this BOA. Joan Kessner stated that these are the Inter-Contractor Procurement Team (ICPT) contracts placed several years ago. Joan stated that WCH used the list of ICPT contract holders to narrow their bid list when placing their analytical services contracts. Jonathan Sanwald stated he has looked at the list of ICPT BOA laboratories and there are no QA requirements referenced in the documents he was able to view. Chris Sutton stated that the ICPT BOA deliberately has few requirements specified. The intent is for the site requesting services to insert their specific requirements in the SOW used to place the order. Joan Kessner added the intent of the ICPT BOA is to have a set of "pre-approved" laboratories and a general pricing schedule from each. Specific pricing is requested when placing an order with an attached SOW. Jonathan Sanwald stated that the MSA ESL shows laboratories audited by DOECAP. Some of the DOE approved suppliers show a very old date for when the approval was obtained. Therefore, Jonathan is not sure that list is valuable. Chris Sutton stated that while not useful for determining approval status of a laboratory, the list was used by CHPRC to down select laboratories for contract solicitation. Jonathan Sanwald also stated a frustration in being able to keep the AVS ESL current when the DOECAP audits aren't available to him. Glen

Clark stated that the Contractors are required to maintain an approved suppliers list and WRPS does not rely on the AVS ESL for laboratories that are not subcontracted as QL-1 and QL-2. The WRPS 222-S Laboratory has an ASL that includes all suppliers of laboratory services regardless of quality level. Jonathan Sanwald stated he would like to follow up with Focus Group members at a later date to determine a means to make the AVS ESL more valuable. Glen Clark stated that he used to send DOECAP audit reports to AVS as he obtained them for laboratories used by WRPS to keep the ESL up to date and he thought Huei Meznarich was doing this also, but speculated that the ESL is likely out of date. Fred Dunhour asked if DOECAP should maintain an approved suppliers list. Glen Clark stated that DOECAP does not “approve” laboratories. The function of DOECAP is to provide an audit report and it is up to the individual sites to determine if approval should be granted based on the report. Jeff Cheadle stated that access to the DOECAP audit reports is set up so that only Federal personnel can access them freely because the reports contain Official Use Only (OUO) information. Rich Weiss stated that the other source of DOECAP audit reports is the laboratories themselves. The laboratories have the DOECAP audit reports and should share them when asked. Rich acknowledged that some laboratories treat the reports as confidential and some do not. Chris Sutton stated that part of CHPRC’s contract award process was to obtain the latest DOECAP audit report from the laboratory and review it to determine if any findings relevant to HASQARD requirements were identified. Jonathan Sanwald took the action to meet with MSA QA management prior to the next Focus Group meeting to discuss what has been said at this meeting and determine an appropriate path forward.

Regarding DOECAP evaluations, Rich Weiss stated that no laboratory has ever “failed” a DOECAP audit. In fact, category 1 findings (the most severe level of finding in the DOECAP system) are rare. It is very rare that DOECAP findings result in a statement that data quality is impacted by the finding. When a category 1 finding is issued to a laboratory, a notification letter is issued to the laboratory and the DOECAP points of contact at each site. This provides the DOECAP personnel with information on an issue requiring follow-up in subsequent audits. Rich took the action to determine if the category 1 warning letters are OUO and subsequent to the meeting reported that they are.

Taffy Almeida stated that she is working on a QSM vs HASQARD gap analysis in preparation for an audit she will be supporting in the near future.

IV. New Business

- a. Since the last Focus Group meeting, a question was asked regarding the language found in HASQARD Volume 4, Table 4-5 on the number of times a tuning solution must be analyzed prior to beginning ICP/MS analysis of samples. The Focus Group Secretary summarized the issue and gained approval for a comment placed in the working copy of HASQARD for consideration when Revision 5 of HASQARD is being prepared.
- b. Karl Pool asked about the status of incorporating HASQARD Rev. 4 in the contracts. Joan Kessner stated that HASQARD Rev. 4 is in WCH's contract and implemented with their laboratories. Chris Sutton stated that Rev. 4 is in the CHPRC contract and their SOW reflects requirements necessary to implement it.
- c. The Focus Group Secretary inquired on WCH's transition plans as they relate to transfer of sample analyses that may be in process when the WCH contract expires and responsibilities transfer to CHPRC. Joan Kessner stated that WCH is working on a formal transition plan. The only sample analyses that may be involved would be the monthly stack sample from the 324 Building project and perhaps samples from the 618-10 Burial Ground project. Joan stated they will be working with Chris Sutton to ensure a smooth transition.
- d. Taffy Almeida mentioned that the HASQARD Focus Group web site seems to be out of date with several sets of meeting minutes missing. The Focus Group Secretary took the action to determine why that is the case and rectify it.

Hearing no additional new business, the Focus Group Chair adjourned the meeting at 3:15 PM. The next meeting of the HASQARD Focus Group will be April 19, 2016 in Conference Room 308 at 2420 Stevens.