HASQARD Focus Group
Meeting Minutes
June 24, 2010

The meeting was called to order by Huei Meznarich (acting for Dave Crawford, Focus Group Chairman), at 3:03 PM on June 24, 2010 in Conference Room 308 at 2420 Stevens.

Those attending were: Cliff Watkins (Secretary), Heather Anastos, Jeff Cheadle, Glen Clark, Kathi Dunbar, Robert Elkins, Cindy English, Jim Jewett, Joan Kessner, Huei Meznarich, Steve Smith, Andrew Stevens, Chris Sutton, Chris Thompson, and Eric Wyse.

I. Huei Meznarich requested approval of the minutes from the preceding meeting and hearing no objections to the minutes as presented they were approved.

II. Huei Meznarich recognized the newest member of the Focus Group, Jeff Cheadle, and requested the members of the Focus Group to introduce themselves and their role in the Focus Group to Jeff.

III. The Action Tracking matrix was discussed. The following updates were provided:

a. The process for handling inclusion of interpretations to HASQARD requirements agreed to by the Focus Group has been determined. Interpretations and de minimis changes will be posted on the HASQARD web-site. The Secretary has made contact with the ORP personnel that manager the web site that currently hosts the HASQARD document (http://www.hanford.gov/orp/?page=141&parent=14). The Secretary will follow through with ORP web site personnel to ensure the interpretations and the Focus Group Charter are posted on a public access domain.

b. The issue concerning the required frequency for quality systems assessments in HASQARD was not discussed. At the May 20, 2010 meeting Dave Crawford volunteered to take the **action item** to review the MSA contract to determine if there is an assessment frequency requirement for the WSCF laboratory contained in that document. Dave was not present at this meeting to report on the status of that action. The matter was tabled for the next meeting.

c. The action item assigned to Chris Sutton to provide the Focus Group with several “story board” presentations on how electronic chain-of-custody might be used was deferred one month. Chris reported that the story boards are prepared and are being reviewed prior to presentation. Chris indicated that he expects to present this material to the focus Group next

month.

d. The action to report to the subcommittees on where the material in Section 5 of the QSAS will need to be addressed by their efforts will occur as part of the overall revision process to the HASQARD resulting from the HASQARD/DOECAP/QSAS gap analysis. This action will be closed.

IV. The status on the subcommittees established to compare the QSAS and HASQARD requirements was provided by the coordinator for each subcommittee:

a. Sampling: Chris Sutton (Coordinator), Wendy Thompson:

Chris Sutton reported that the last meeting was poorly attended due to the majority of sampling personnel being in the middle of their sampling season. The revision to Section 4 of Volume 2 is completed and has been reviewed and commented on. Chris will resolve comments and redistribute this section.

b. Organic Analysis: Glen Clark (Coordinator), Robert Elkins and Cliff Watkins

Glen Clark reported that the organic sub-group has completed a review of the DOECAP audit checklist lines of inquiry and HASQARD requirements including a review of the QSAS Gray Boxes to determine the basis for the DOECAP checklist items. The group has produced an electronic file of Volumes 1 and 4 (Rev. 3) in Word format with track changes used to highlight the proposed changes to the HASQARD resulting from the findings of the group. The group intends to do one last read of the QSAS to see if there is more in the document that is not in the Gray Boxes that may impact organic analysis-specific language in the HASQARD. The group reported that they have made only 8 to 10 changes as a result of the review. Eric Wyse suggested that there will be many more changes required if the entire QSAS content is attempted to be incorporated in HASQARD. The organic sub-group will investigate this issue.

c. Inorganic Analysis: Heather Anastos (Coordinator), Chris Thompson, Jim Jewett, Eric Wyse

Heather Anastos reported that a similar effort to that of the organic team is underway. She stated the team has spent a great deal of time discussing the approach for how to recommend a change/deletion or what to ignore as this effort proceeds. The basic issue comes down to how prescriptive a requirements document we need HASQARD to be at this time. The inorganic group will continue but opened the topic of the future direction

of the HASQARD document for group discussion (see New Business section of these minutes below).

d. Radiochemistry: Joan Kessner (Coordinator), Rich Weiss, Huei Meznarich, Karl Pool, Eric Wyse

Joan Kessner reported that about two thirds of the subcommittee has completed their review of the checklist. The sub-group has lost a month of productivity due to an illness suffered by one of the members of the group. They plan to reconvene before the next HASQARD Focus Group Meeting and will expect a one-month schedule slip as a result.

e. Quality Assurance/Management Systems: Steve Smith (Coordinator), Taffy Almeida, Cindy English, Larry Markel, Kris Kuhl-Klinger, and Kathi Dunbar:

Steve Smith reported the QA sub-group is on schedule. They have completed a red-lined version of HASQARD Vol.1 and will distribute it for comment within the QA sub-group. They feel they are on schedule for completion of the task.

f. Section 5:

Steve Smith reported that efforts have not focused on Section 5 specifically. They intend to incorporate the material required from Section 5 in the HASQARD revisions they propose. If an analysis-specific requirement or revision is identified, it will be discussed with the applicable sub-group prior to incorporating it in the final HASQARD revision proposals.

V. New Business

a. During the discussion of the sub-group status, a new business item was introduced related to the DOECAP/HASQARD comparison. Specifically, Chris Thompson raised the question of how similar the two requirements documents, DOECAP's QSAS and HASQARD, should be. This was asked because in some cases they deviate greatly. Eric Wyse added that to make the QSAS and HASQARD equivalent would require a total re-write of HASQARD because there are large gaps in details between the two documents. Because of this, the effort of proposing revisions gets difficult in determining what should go in the HASQARD and which QSAS requirements are substantially covered acceptably by the current wording of the HASQARD. During this discussion the question was asked, "What is the purpose of HASQARD today and if it is just a QA document, are Volumes 2, 3, and 4 with all of their discipline-specific requirements necessary?" Joan Kessner provided the historical perspective that the

HASQARD was originally one volume but became unwieldy for people looking for requirements related to one aspect. For example, when conducting laboratory audits, only the material in Volumes 1 and 4 apply. In specifying requirements for commercial laboratory contracts, for example, it was much better to specify that they were required to only comply with Volumes 1 and 4.

Heui Meznarich polled the Focus Group for opinions regarding the path forward for HASQARD. The group was encouraged to "open the book" on suggestions for improving the current situation. Points raised during this brainstorming session included:

- How much detail should be retained: QSAS has lots of references to specific SW-846 requirements and radiochemistry requirements that came form the Fernald SOW for radiochemistry laboratories. Should HASQARD be that detailed or simply specify a minimum expectation as it does now.
- HASQARD does seem to provide some specifics in some areas that may be similar to those in QSAS (e.g., where minimum calibration requirements are specified) yet in others it is at a higher level than QSAS. How is this discrepancy resolved?
- The requirements for use of the criteria specified in the current tables listing QC sample frequency and calibration in HASQARD state that "…use of CLP or SW-846 methods are acceptable." This implies that use of the QC sample frequencies and calibration criteria specified in one of those methods may be used but the HASQARD requirements are provided for cases where no method requirements exist. The HASQARD is not worded clearly on this however and could also be read to mean that even if you are using CLP or SW-846 methods, the frequencies and criteria in the tables must be met.
- Kathi Dunbar mentioned that she is hearing that DOE-ORP is confused on where the requirements for analytical QA for commercial laboratories are coming from (i.e., DOECAP/QSAS or HASQARD). Both Jim Jewett and Glen Clark added that the HASQARD is used to assess on-site laboratories and DOECAP/QSAS for off-site laboratories.
- Andy Stevens posed the question, "What is the purpose of HASQARD? Is it a document to audit to? He genuinely didn't know the answer and was looking for some perspective from the group. Jim Jewett thought it was TPA driven, but Joan clarified that the HASQARD is not specifically called out in the TPA. There was no representation from any of the regulators at this meeting, but the group recognized that Ecology places a great deal of value in the HASQARD document such that it can't go away without a replacement. But, the group agreed that there is a need

to determine the purpose of this document in the current contractor/commercial laboratory/multiple DOE Field Office dynamic currently in place at Hanford.

- Joan Kessner added that whatever it is we decide to do with the document, we need to begin with the end in mind. That is, the purpose of the document is to specify quality requirements to ensure we get data from the laboratories that we can use in decision making. WCH currently uses HASQARD as part of their contracts with commercial laboratories. Joan acknowledged that both QSAS an HASQARD can be improved. One of those documents should not be help up as the last word on the topic of laboratory QA. So, when reviewing the QSAS versus HASQARD requirements we should look at those additional QSAS requirements that make the data better when deciding how to make HASQARD better and only incorporate those.
- Robert Elkins added that HASQARD has always been useful as more than a requirements document. It has been useful basis for consensus building. Because of that it should be more general than prescriptive. The specifics should be in the analytical methods and the procedures used at the laboratories.
- Glen Clark stated that HASQARD should not be completely DOECAP compliant because some of the history of the QSAS development included incorporation of requirements from other sites' analytical services contracts. Therefore, while QSAS is a consensus document forged through compromise and imposed upon DOE, the HASQARD should be what makes sense for Hanford.
- Steve Smith noted that too much QA specificity can make things unmanageable and that HASQARD should be a high level document. Cliff Watkins added that there is fine line however. If a QA document is written at too high a level, without specific minimum requirements, it leaves the users wondering what they need to do to be in compliance.
- The group asked what was driving the effort of comparing DOECAP and HASQARD. Cliff Watkins read the passage from the MSA SOW requiring RJ Lee Group to ensure the HASQARD is managed in a collaborative manner and to conduct a comparison of DOECAP to HASQARD. The group asked if someone could find out why the DOECAP to HASQARD comparison was added to the SOW. Dave Crawford was assigned the **action item** to determine why that language is in the MSA contract SOW.

Hearing no additional new business, Huei Meznarich adjourned the meeting at 4:25 PM.