



PPG Protective and Marine Coatings Nuclear Quality Management Systems Manual

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Approvals			
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Applicable Locations

**Manufacturing, Distribution, & Technical
(Commonly Referred to as Little Rock Facility)
11605 Vimy Ridge Road
Alexander, AR 72002**

**Manufacturing, Distribution, & Technical
856 Echo Lake Road
Watertown, CT 06795**

**Technical
1377 Oakleigh Drive
East Point, GA 30344**

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1 Introduction

PPG Protective and Marine Coatings (PMC) is a world leader in protective and marine coatings. PMC products protect customers' assets in some of the World's most demanding conditions and environments. PMC products coat a wide variety of projects in various markets including: marine, infrastructure, energy, transportation and petrochemical.

PMC products for nuclear safety related applications include specific formulations from our Amercoat and Keeler & Long brands. Both brands have a long history and good performance record within the nuclear energy industry.

2 Purpose and Scope

This manual provides the Quality Assurance Program requirements implemented by PPG PMC at the following locations:

1. Manufacturing, Distribution, & Technical
(Commonly Referred to as Little Rock Facility)
11605 Vimy Ridge Road
Alexander, AR 72002
2. Manufacturing, Distribution, & Technical
856 Echo Lake Road
Watertown, CT 06795
3. Technical
1377 Oakleigh Drive
East Point, GA 30344

These requirements are applicable for purchase orders or contracts for PPG PMC level 1 safety related products. Each purchase order/contract will be reviewed to determine regulated activities and the appropriate measures to be implemented.

This Nuclear Quality Management System meets the requirements of:

- Title 10, U.S. Code of Federal Regulations, Appendix B to Part 50 (10 CFR 50 Appendix B)
- U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide 1.28 Revisions 3 & 4 as appropriate for applicable NQA-1 revision.
- ANSI N45.2-1977 Quality Assurance Program Requirements for Nuclear Power Plants
- ASTM D 3843 Standard Practice for Quality Assurance for Protective Coatings Applied to Nuclear Facilities
- American Society of Mechanical Engineers (ASME) NQA-1-1994 with supplemental requirements, 2004 as related to Department of Energy (DOE) projects, and 2008 (09 addenda) editions.

The safety related products manufactured under this Nuclear Quality Management System comply with applicable requirements of the following standards:

- American National Standards Institute (ANSI)
 - N101.2-1972 Protective Coatings (Paints) for Light Water Nuclear Reactor Containment Facilities
 - N101.4-1972 Quality Assurance Requirements for Nuclear Power Plants
 - N5.12-1974 Protective Coatings (Paints) for the Nuclear Industry
- American Society for Testing and Materials (ASTM)
 - D 3843 Standard Practice for Quality Assurance for Protective Coatings Applied to Nuclear Facilities

- D 3911 Standard Methods for Evaluating Coatings Used in Light-Water Nuclear Power Plants at Stimulated Loss of Coolant Accident (LOCA) Conditions
- D3912 Standard Test Method for Chemical Resistance of Coatings Used in Light-Water Nuclear Power Plants
- D 4082 Standard Test Method for the Determination of Effects of Radiation on Coatings Used in Light-Water Nuclear Power Plants
- D 4256 Standard Test Method for the Determination of the Decontaminability of Coatings Used in Light-Water Nuclear Power Plants

The requirements of these documents shall be complied with as applicable to the products provided. Additionally, the requirements for reporting of defects and noncompliance according Title 10, U.S. Code of Federal Regulations, Part 21 (10 CFR Part 21) will be accepted.

3 Definitions

For the purposes of this document and associated contracts, terms and definitions as designated by ASME NQA-1 are applicable.

4 Quality Assurance Criteria

4.1 Organization

4.1.1 BASIC

The organizational structure, functional responsibilities, levels of authority, and lines of communications for activities affecting quality are documented in the organizational chart below with responsibilities for the establishment and implementation of the quality assurance program defined as follows.

Plant Manager (Little Rock & Watertown) – overall responsibility for both production and quality assurance of Nuclear Level One products.

Quality Assurance Managers (Little Rock & Watertown) – Verifies that the Q.A. /Q.C. activities are performed. The final approval, rejection, or non-conformance disposal for each batch of raw material or finished product is by authority of the Manager of Quality Assurance and if applicable, with direction from Technical Manager. Traditional quality control functions.

Production Manager (Little Rock & Watertown) – Responsible for manufacturing products under the facility QMS program, according to design controlled batch tickets.

Operation Planning Manager (Little Rock & Watertown) – coordinates orders from Customer Service and Production, by verifying stock, cutting batch tickets and making sure raw materials are available.

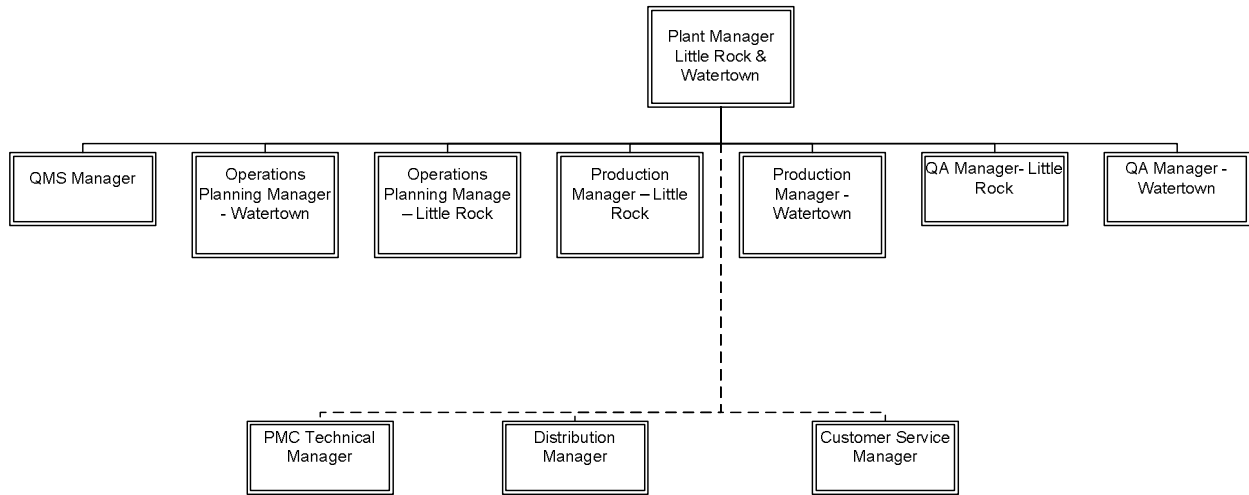
Distribution Manager (Little Rock & Watertown) – overall responsibility of shipping and receiving finished goods.

PMC Technical Manager –overall responsibility for the direction of design control functions and formulations at PPG PMC.

QMS Manager – responsible for the implementation of the QMS Program and informing PPG PMC management of the status and adequacy of the program. Traditional quality assurance functions.

The organization chart provides an outline of the organizational structure. Additional information such as job descriptions, work instructions, etc. may be used to provide guidance where needed.

Organizational Chart



4.1.2 STRUCTURE AND RESPONSIBILITY

The organizational structure and responsibility of assignments is such that:

- Senior management establishes overall expectations for effective implementation of the quality assurance program and is responsible for obtaining the desired end result.
- Quality is achieved and maintained by those assigned responsibility for performing work.
- Quality achievement is verified by those not directly responsible for performing the work.
- Those responsible for assuring that an appropriate quality assurance program have been established and those verifying activities affecting quality have sufficient authority, direct access to responsible levels of management, organizational freedom, and access to work to perform this function, including sufficient independence from cost and schedule when opposed to safety function considerations. These verification functions include the following:
 - (1) identifying quality problems
 - (2) initiating, recommending, or providing solutions to quality problems through designated channels
 - (3) verifying implementation of solutions
 - (4) assuring that further processing, delivery, installation, or use is controlled until proper disposition of a nonconformance, deficiency, or unsatisfactory condition has occurred.

Delegation of Work

The individual or organization responsible for establishing and executing a quality assurance program may delegate any or all of the work to others but shall retain responsibility.

4.1.3 INTERFACE CONTROL

Where more than one organization is involved in the execution of activities, the responsibilities, interfaces, and authority of each organization shall be clearly defined and documented.

The external interfaces between organizations and the internal interfaces between organizational units, and changes thereto, shall be documented.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.2 Quality Assurance Program

4.2.1 BASIC

A documented quality assurance program shall be planned, implemented, and maintained. The program shall identify the activities and items to which it applies. The program shall provide control over activities affecting quality to an extent consistent with their importance. The program shall include monitoring activities against acceptance criteria in a manner sufficient to provide assurance that the activities affecting quality are performed satisfactorily. The program shall be established at the earliest time consistent with the schedule for accomplishing the activities.

Structure of Quality Assurance Program Documentation

A three-tier documentation system is implemented to structure documentation. This allows for information to be presented in an organized manner and available to those who need it.

1. Quality Systems Manual
2. Work Instructions/Procedures
3. Forms and Records

The program shall provide for the planning and accomplishment of activities affecting quality under suitably controlled conditions. Controlled conditions include the use of appropriate equipment, suitable environmental conditions for accomplishing the activity, and assurance that prerequisites for the given activity have been satisfied. The program shall provide for any special controls, processes, test equipment, tools, and skills to attain the required quality of activities and items and for verification of that quality. The organization shall establish and implement processes to detect and correct quality problems.

The program shall provide for indoctrination, training, and qualification as necessary of personnel performing or managing activities affecting quality to ensure that suitable proficiency is achieved and maintained.

Management shall formally assess the adequacy and effective implementation of the quality assurance program at least once per calendar year.

4.2.2 INDOCTRINATION AND TRAINING

Indoctrination and training shall be commensurate with scope, complexity, importance of the activities, and the education, experience, and proficiency of the person.

Indoctrination

Personnel performing or managing activities affecting quality shall receive indoctrination in their job responsibilities and authority that includes general criteria, technical objectives, requirements of applicable codes and standards, regulatory commitments, company procedures, and quality assurance program requirements.

Training

The need for a formal training program for personnel performing or managing activities affecting quality shall be determined. Training shall be provided, if needed, to achieve initial proficiency, maintain proficiency, and adapt to changes in technology, methods, or job responsibilities. On-the-job training shall be used if direct hands-on applications or experience is needed to achieve and maintain proficiency.

4.2.3 QUALIFICATION REQUIREMENTS

The responsible organization shall designate those activities that require qualification of personnel and the minimum requirements for such personnel. The responsible organization shall establish written procedures for the qualification of personnel, and for the assurance that only those personnel who meet the requirements are permitted to perform these activities.

Specific qualification requirements for personnel performing nondestructive examination inspection and tests to verify quality and auditing are specified below.

4.2.3.1 Nondestructive Examination (NDE)

This section specifies requirements for the qualification of personnel who perform radiographic (RT), magnetic particle (MP), ultrasonic (UT), liquid penetrant (PT), electromagnetic (ET), neutron radiographic (NR), leak testing (LT), acoustic emission (AE), and visual testing (VT) to verify conformance to the specified requirements. The American Society of Nondestructive Testing (ASNT) Recommended Practices or Standards provide acceptable qualification requirements for NDE personnel. Applicable Codes and Standards or design criteria controlling the qualification of NDE personnel shall be utilized to establish the applicable ASNT qualification requirement and edition or to specify an equivalent alternative requirement.

4.2.3.2 Inspection and Test

The initial capabilities of a candidate shall be determined by an evaluation of the candidate's education, experience, training, and either test results or capability demonstration. The job performance of inspection and test personnel shall be reevaluated at periodic intervals not to exceed 3 years. Reevaluation shall be by evidence of continued satisfactory performance or redetermination of capability in accordance with the requirements of this section. If during this evaluation or at any other time, it is determined by the responsible organization that the

capabilities of an individual are not in accordance with the qualification requirements specified for the job, that person shall be removed from that activity until such time as the required capability has been demonstrated. Any person who has not performed inspection or testing activities in the qualified area for a period of 1 year shall be reevaluated.

4.2.3.3 Lead Auditor

The Lead Auditor organizes and directs audit, reports audit findings, and evaluates corrective action. An individual shall meet the following requirements prior to being designated a Lead Auditor.

Communication Skills - The prospective Lead Auditor shall be capable of communicating effectively, both in writing and orally. These skills shall be attested to in writing.

Training - Prospective Lead Auditors shall receive training to the extent necessary to assure auditing competence including:

- knowledge and understanding of nuclear-related codes, standards, regulations, and regulatory guides
- general structure of quality assurance programs as a whole and applicable elements
- auditing techniques of examining, questioning, evaluating, and reporting; methods of identifying and following up on corrective action items and closing out audit findings
- planning audits of activities affecting quality
- on-the-job training to include applicable elements of the audit program

Audit Participation - Prospective Lead Auditors shall participate in a minimum of five quality assurance audits within a period of time not to exceed 3 years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within the year prior to qualification.

Participation in independent assessments including team assessment activities such as operations readiness reviews and regulatory inspections/surveys may be used to satisfy up to four of the five required quality assurance audits, provided that the activities can demonstrate the following:

- independence from the functional areas being assessed
- planning that establishes the scope of the activities and associated evaluation criteria
- performance by technically qualified and experienced personnel
- results that are documented and reported to management
- appropriate corrective action initiated and tracked to resolution

Such participation shall be subject to review and acceptance by the organization responsible for quality assurance audits and/or the certifying authority prior to their use for qualification.

Examination - Prospective Lead Auditors shall pass an examination that shall evaluate comprehension of and ability to apply the body of knowledge identified above. The examination may be oral, written, practical, or any combination thereof.

Maintenance of Proficiency - Lead Auditors shall maintain their proficiency through one or more of the following:

- regular and active participation in the audit process
- review and study of codes, standards, procedures, instructions, and other documents related to quality assurance program and program auditing
- participation in training program(s)

Based on annual assessment, management may extend the qualification, require retraining, or require requalification.

Requalification - Lead Auditors who fail to maintain their proficiency for a period of 2 years or more shall require requalification per this section including reexamination and participation as an auditor in at least one nuclear quality assurance audit.

Auditors

Auditors are participants in an audit. Auditors shall have, or be given, appropriate training or orientation to develop their competence for performing audits. Competence of personnel for performance of the various auditing functions shall be developed by one or more of the following methods:

- orientation to provide a working knowledge and understanding of this Standard and the auditing organization's procedures for implementing audits and reporting results.
- general and specialized training in audit performance where the general training shall include fundamentals, objectives, characteristics, organization, performance, and results of quality auditing and the specialized training shall include methods of examining, questioning, evaluating, and documenting specific audit items and methods of closing out audit findings.
- on-the-job training, guidance, and counseling under the direct supervision of a Lead Auditor. Such training shall include planning, performing, reporting, and follow-up action involved in conducting audits.

Technical Specialists

The type of auditing/surveying conducted by PPG PMC, doesn't typically require a technical specialist. If/when determined that an audit/survey requires a technical specialist, the PMC technical department is consulted.

4.2.4 RECORDS OF QUALIFICATION

The qualification of inspection, test, and Lead Auditor personnel shall be certified in writing and include the following information:

- (1) employer's name
- (2) identification of person being certified
- (3) activities certified to perform
- (4) basis of qualification
 - (a) education, experience, indoctrination, and training
 - (b) test results, where applicable
 - (c) capability demonstration results
- (5) results of periodic evaluation
- (6) results of physical examinations, when required
- (7) signature of employer's designated representative who is responsible for such certification
- (8) date of certification or recertification and certification expiration.

The responsible organization shall identify any special physical characteristics needed in the performance of each activity, including the need for initial and subsequent physical examination. The employer may delegate qualification examination activities to an independent certifying agency, but shall retain responsibility for conformance of the examination and its administration. Integrity of the examination shall be maintained by the employer or certifying agency through appropriate confidentiality of files and, where applicable, proctoring of examinations. Copies of the objective evidence regarding the type and content of the examination shall be retained.

4.2.5 RECORDS

Records of the implementation for indoctrination and training may take the form of attendance sheets, training logs, or personnel training records. Records of indoctrination and training shall include one or more of the following:

- attendance sheets
- training logs
- personnel training records

PPG PMC establishes and maintains records for indoctrination and training; Auditor and Lead Auditor qualification and requalification; and inspection and test personnel qualification and requalification.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.3 Design Control

4.3.1 BASIC

The design shall be defined, controlled, and verified.

Design inputs shall be specified on a timely basis and translated into design documents. Design interfaces shall be identified and controlled. Design adequacy shall be verified by individuals other than those who designed the item or computer program. Design changes shall be governed by control measures commensurate with those applied to the original design.

4.3.2 DESIGN INPUT

Applicable design inputs shall be identified and documented, and their selection reviewed and approved. The design input shall be specified to the level of detail necessary to permit the design activities to be carried out in a correct manner and to provide a consistent basis for making design decisions, accomplishing design verification measures, and evaluating design changes.

4.3.3 DESIGN PROCESS

PPG PMC technical department shall prescribe and document the design activities to the level of detail necessary to permit the design process to be carried out in a correct manner, and to permit verification that the design meets requirements. Design documents shall support facility design, construction, and operation. Appropriate quality standards shall be identified and documented, and their selection reviewed and approved.

The design methods, materials, parts, equipment, and processes that are essential to the function of the items shall be selected and reviewed for suitability of application. Applicable information derived from experience, as set forth in reports or other documentation, shall be made available to design personnel.

The final design shall:

- be relatable to the design input by documentation in sufficient detail to permit design verification.
- specify required inspections and tests and include or reference appropriate acceptance criteria.
- identify assemblies and/ or components that are part of the item being designed. When such an assembly or component part is a commercial grade item, the critical characteristics of the item to be verified for acceptance and the acceptance criteria for those characteristics shall meet the requirements of ASME NQA-1 Subpart 2.14.

Critical characteristics to be verified are those that provide reasonable assurance that the item

will perform its intended function. If a commercial grade item, prior to its installation, is modified or selected by special inspection and/ or testing to requirements that are more restrictive than the Supplier's published product description, the component part shall be represented as different from the commercial grade item in a manner traceable to a documented definition of the difference.

4.3.4 DESIGN ANALYSES

Design analyses shall be sufficiently detailed such that a person technically qualified in the subject can review and understand the analyses and verify the adequacy of the results without recourse to the originator.

4.3.4.1 Use of Computer Programs

PPG PMC does not use computer design programs.

4.2.4.2 Documentation of Design Analyses

Documentation of design analyses shall include the following:

- the objective of the analyses
- design inputs and their sources
- results of literature searches or other applicable background data
- assumptions and indication of those assumptions that must be verified as the design proceeds
- identification of any computer calculation, including identification of the computer type, computer program name, and revision, inputs, outputs, evidence of or reference to computer program verification, and the bases (of reference thereto) supporting application of the computer program to the specific physical problem
- review and approval

4.3.5 DESIGN VERIFICATION

The responsible design organization shall identify and document the particular design verification method(s) used. The results of design verification shall be documented with the identification of the verifier clearly indicated. Design verification shall be performed by any competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization. This verification may be performed by the originator's supervisor, provided

(1) the supervisor did not specify a singular design approach or rule out certain design considerations and did not establish the design inputs used in the design; or

(2) the supervisor is the only individual in the organization competent to perform the

verification.

Cursory supervisory reviews do not satisfy requirements.

Design verification shall be performed prior to releasing the design for procurement, manufacture, construction, or use by another design organization, except where this timing cannot be met, such as when insufficient data exist. In those cases, the unverified portion of the design shall be identified and controlled. In all cases the design verification shall be completed prior to relying upon the component, system, structure, or computer program to perform its function.

If the design is modified to resolve verification findings, the modified design shall be verified prior to release or use.

Extent of Design Verification

The extent of the design verification shall be a function of the importance to safety, the complexity of the design, the degree of standardization, the state of the art, and the similarity with previously proved designs. Where the design has been subjected to a verification process, the verification process need not be duplicated for identical designs. However, the applicability of standardized or previously proven designs, with respect to meeting pertinent design inputs, shall be verified for each application. Known problems affecting the standard or previously proved designs and their effects on other features shall be considered. The original design and associated verification documentation shall be referenced in records of subsequent application of the design.

4.2.5.1 Methods

Acceptable verification methods include design reviews, alternate calculations, and qualification testing.

4.3.5.2 Design Reviews. Design reviews shall provide assurance that the final design is correct and satisfactory by addressing the following:

- (a) Were the design inputs correctly selected?
- (b) Are assumptions necessary to perform the design activity adequately described and reasonable? Where necessary, are the assumptions identified for subsequent reverifications when the detailed design activities are completed?
- (c) Were appropriate design methods and computer programs used?
- (d) Were the design inputs correctly incorporated into the design?
- (e) Is the design output reasonable compared to design inputs?
- (f) Are the necessary design inputs for interfacing organizations specified in the design documents or in supporting procedures or instructions?
- (g) Have suitable materials, parts, processes, and inspection and testing criteria been specified?

4.3.5.3 Alternate Calculations

Alternate calculations shall use alternate methods to verify correctness of the original calculations or analyses. The appropriateness of assumptions; input data used; and the computer program, its associated computer hardware and system software, or other calculation method used shall also be reviewed.

4.3.5.4 Qualification Tests

Testing shall demonstrate adequacy of performance under conditions that simulate the most adverse design conditions. Operating modes and environmental conditions shall be considered in determining the most adverse conditions. Where the test is intended to verify only specific design features, the other features of the design shall be verified by other means. When tests are being performed on models or mockups, scaling laws shall be established and verified. The results of model test work shall be subject to error analysis, where applicable, prior to use in the final design.

4.3.6 CHANGE CONTROL

Changes to design inputs, final designs, field changes, and temporary and permanent modifications to operating facilities shall be justified and subject to design control measures commensurate with those applied to the original design. These measures shall include evaluation of effects of those changes on the overall design and on any analysis upon which the design is based. The evaluation shall include facility configurations that occur during operation, maintenance, test, surveillance, and inspection activities. Changes shall be approved by the same affected groups or organizations that reviewed and approved the original design documents. When the organization originally responsible for review and approval of the original design documents is no longer responsible, the owner or his designee shall have responsibility or designate a new responsible organization. The design organization approving the change shall have demonstrated competence in the specific design area of interest and have an adequate understanding of the requirements and intent of the original design.

When a design change is approved other than by revision to the affected design documents, measures shall be established to incorporate the change into these documents, where such incorporation is appropriate.

Where a significant design change is necessary because of an incorrect design, the design process and verification procedure shall be reviewed and modified as necessary.

4.3.6.1 Configuration Management of Operating Facilities

Configuration management of operating facilities does not apply to PPG PMC processes. The batch processing used is standard fixed equipment that is used for safety related and non-safety related production.

4.3.7 INTERFACE CONTROL

Interface controls shall include assignment of responsibility and establishment of procedures among participating design organizations for review, approval, release, distribution, and revision of documents involving design interfaces.

Design information transmitted across interfaces shall identify the status of the design information or document provided, and identify incomplete items that require further evaluation, review, or approval. Where it is necessary to initially transmit design information orally or by other informal means, the transmittal shall be confirmed promptly by a controlled document.

4.3.8 SOFTWARE DESIGN CONTROL

Not applicable. PPG PMC does not use design software programs.

4.3.9 DOCUMENTATION AND RECORDS

Design documentation and records shall include not only final design documents, such as drawings and specifications, and revisions to those documents, but also documentation that identifies the important steps in the design process, including sources of design inputs that support the final design.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.4 Procurement Document Control

4.4.1 BASIC

Applicable design bases and other requirements necessary to assure adequate quality shall be included or referenced in documents for procurement of items and services. To the extent necessary, procurement documents shall require Suppliers to have a quality assurance program consistent with the applicable requirements of this Standard.

4.4.2 CONTENT OF THE PROCUREMENT DOCUMENTS

Procurement documents issued at all tiers of procurement shall include provisions for the following, as deemed necessary by the Purchaser.

4.4.2.1 Scope of Work

Procurement documents shall include a statement of the scope of the work to be performed by the Supplier.

4.4.2.2 Technical Requirements

Technical requirements shall be specified in the procurement documents. These requirements shall be specified, as appropriate by reference to specific drawings, specifications, codes, standards, regulations, procedures, or instructions, including revisions thereto that describe the items or services to be furnished. The procurement documents shall identify appropriate test, inspection, and acceptance criteria for determining acceptability of the item or service.

4.4.2.3 Quality Assurance Program Requirements

Quality assurance program requirements shall be specified in the procurement documents. These requirements shall be consistent with importance and/or complexity of the item or service being procured. The procurement documents shall require the Supplier to incorporate appropriate quality assurance program requirements in sub tier procurement documents.

4.4.2.4 Right of Access

The procurement documents shall provide for access to the Supplier's and sub tier Supplier's facilities and records for surveillance, inspection, or audit.

4.4.2.5 Documentation Requirements

The procurement documents shall identify the documentation required to be submitted for information, review, or approval by the Purchaser. The time of submittal shall also be established. When the Purchaser requires the Supplier to maintain specific records, the

retention times and disposition requirements shall be prescribed.

4.4.2.6 Nonconformances

The procurement documents shall specify the requirements for the Supplier's reporting of nonconformances.

4.4.2.7 Spare and Replacement Parts

The procurement documents shall specify the requirements to identify spare and replacement parts or assemblies and the related data required for ordering these parts or assemblies.

4.4.3 PROCUREMENT DOCUMENT REVIEW

A review of the procurement documents, and changes thereto, shall be made and documented prior to award to assure that documents transmitted to prospective Supplier(s) include appropriate provisions to assure that items or services will meet the specified requirements.

Technical or quality assurance program changes made as a result of bid evaluations or negotiations shall be incorporated into the procurement documents prior to their issuance to the Supplier.

Procurement document review shall be performed by personnel who have access to pertinent information and who have an adequate understanding of the requirements and intent of the procurement documents.

4.4.4 PROCUREMENT DOCUMENT CHANGES

Procurement document changes affecting the technical or quality assurance program requirements shall be subject to the same degree of control as utilized in the preparation of the original documents.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.5 Instructions, Procedures, and Drawings

Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. The activity shall be described to a level of detail commensurate with the complexity of the activity and the need to assure consistent and acceptable results. The need for, and level of detail in, written procedures or instructions shall be determined based upon complexity of the task, the significance of the item or activity, work environment, and worker and capability (education, training, experience).

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.6 Document Control

4.6.1 BASIC

The preparation, issue, and change of documents that specify quality requirements or prescribe activities affecting quality such as instructions, procedures, and drawings shall be controlled to ensure that correct documents are being employed. Such documents, including changes thereto, shall be reviewed for adequacy and approved for release by authorized personnel.

4.6.2 DOCUMENT CONTROL

The following controls shall be applied to documents and changes:

- the identification of controlled documents
- the specified distribution of controlled documents for use at the appropriate location
- the identification of individuals responsible for the preparation, review, approval, and distribution of controlled documents
- the review of controlled documents for adequacy, completeness, and approval prior to distribution
- a method to ensure the correct documents are being used

4.6.3 DOCUMENT CHANGES

4.6.3.1 Major Changes

PPG PMC does not define major or minor changes. All changes shall be reviewed and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated. The reviewing organization shall have access to pertinent background data or information upon which to base their approval.

4.6.3.2 Minor Changes

Not applicable. See section 4.6.3.1 above.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.7 Control of Purchased Items and Services

4.7.1 BASIC

The procurement of items and services shall be controlled to ensure conformance with specified requirements. Such control shall provide for the following as appropriate: source evaluation and selection, evaluation of objective evidence of quality furnished by the Supplier, source inspection, audit, and examination of items or services upon delivery or completion.

4.7.2 SUPPLIER EVALUATION AND SELECTION

Prior to award of a contract, the PPG PMC shall evaluate the Supplier's capability to provide items or services in accordance with the requirements of the procurement documents. Supplier evaluation and selection and the results therefrom shall be documented and shall include one or more of the following:

- Supplier's history of providing an identical or similar product that performs satisfactorily in actual use. The Supplier's history shall reflect current capability.
- Supplier's current quality records supported by documented qualitative and quantitative information that can be objectively evaluated.
- Supplier's technical and quality capability as determined by a direct evaluation of the facilities, personnel, and the implementation of the Supplier's quality assurance program.

4.7.3 BID EVALUATION

If bids are solicited, the bid evaluation shall include a determination of the Supplier's capability to conform to the technical and quality assurance requirements. Prior to the award of the contract, PPG PMC shall resolve or obtain commitments to resolve unacceptable technical and quality assurance conditions resulting from the bid evaluation.

4.7.4 CONTROL OF SUPPLIER-GENERATED DOCUMENTS

Controls shall be implemented to ensure that the submittal and evaluation of Supplier-generated documents and changes are accomplished in accordance with the procurement document requirements. These controls shall provide for the acquisition, processing, and recorded evaluation of the quality assurance, technical, inspection, and test documentation or data against acceptance criteria.

4.7.5 ACCEPTANCE OF ITEM OR SERVICE

4.7.5.1 General

Prior to offering the item or service for acceptance, the Supplier shall verify that the item or

service being furnished complies with the procurement requirements. The extent of the verification activities by PPG PMC shall be a function of the relative importance, complexity, and quantity of the item or services procured and the Supplier's quality performance. Where required by code, regulation, or contract requirement, documentary evidence that items conform to procurement requirements shall be available at the nuclear facility site prior to installation or use.

4.7.5.2 Methods of Acceptance

PPG PMC methods used to accept an item or service from a Supplier shall be a Supplier Certificate of Conformance, source verification, or receiving inspection, or a combination of these methods.

4.7.5.3 Certificate of Conformance

When a Certificate of Conformance is used, the minimum criteria below shall be met:

- (a) The certificate shall identify the purchased material or equipment, such as by the purchase order number.
- (b) The certificate shall identify the specific procurement requirements met by the purchased material or equipment, such as codes, standards, and other specifications. This may be accomplished by including a list of the specific requirements or by providing, on-site, a copy of the purchase order and the procurement specifications or drawings, together with a suitable certificate. The procurement requirements identified shall include any approved changes, waivers, or deviations applicable to the subject material or equipment.
- (c) The certificate shall identify any procurement requirements that have not been met, together with an explanation and the means for resolving the nonconformances.
- (d) The certificate shall be signed or otherwise authenticated by a person who is responsible for this quality assurance function and whose function and position are described in the Purchaser's or Supplier's quality assurance program.
- (e) The certification system, including the procedures to be followed in filling out a certificate and the administrative procedures for review and approval of the certificates, shall be described in the Purchaser's or Supplier's quality assurance program.
- (f) Means shall be provided to verify the validity of Supplier certificates and the effectiveness of the certification system, such as during the performance of audits of the Supplier or independent inspection or test of the items. Such verification shall be conducted by the Purchaser at intervals commensurate with the Supplier's past quality performance.

4.7.5.4 Source Verification

When source verification is used, it shall be performed at intervals consistent with the importance and complexity of the item or service, and shall include monitoring, witnessing, or observing selected activities. Source verification shall be implemented in accordance with plans to perform inspections, examinations, or tests at predetermined points. Upon PPG PMC acceptance of source verification, documented evidence of acceptance shall be furnished to the receiving destination of the item, to PPG PMC, and to the Supplier.

4.7.5.5 Receiving Inspection

When receiving inspection is used, purchased items shall be inspected as necessary to verify conformance to specified requirements, taking into account source verification and audit activities and the demonstrated quality performance of the Supplier. Receiving inspection shall verify by objective evidence such features as

- configuration
- identification
- dimensional, physical, and other characteristics
- freedom from shipping damage
- cleanliness

Receiving inspection shall be coordinated with review of Supplier documentation when procurement documents require such documentation to be furnished prior to receiving inspection.

4.7.5.6 Postinstallation Testing

PPG PMC does not use post-installation testing for acceptance.

4.7.5.7 Acceptance of Services Only

In cases involving procurement of services only, such as third-party inspection; engineering and consulting services; auditing; and installation, repair, overhaul, or maintenance work, the Purchaser shall accept the service by any or all of the following methods:

- technical verification of data produced
- surveillance and/or audit of the activity
- review of objective evidence for conformance to the procurement document requirements

4.7.5.8 CONTROL OF SUPPLIER NONCONFORMANCES

Methods for control and disposition of Supplier nonconformances for items and services that

do not meet procurement document requirements shall include the following:

(a) evaluation of nonconforming items.

(b) submittal of nonconformance notice to PPG PMC by Supplier as directed by the PPG PMC. These submittals shall include Supplier-recommended disposition (e.g., use-as-is or repair) and technical justification. Nonconformances to the procurement requirements or PPG PMC-approved documents, which consist of one or more of the following, shall be submitted to PPG PMC for approval of the recommended disposition:

- technical or material requirement is violated
- requirement in Supplier documents, which has been approved by PPG PMC, is violated
- nonconformance cannot be corrected by continuation of the original manufacturing process or by rework
- the item does not conform to the original requirement even though the item can be restored to a condition such that the capability of the item to function is unimpaired

(c) PPG PMC disposition of Supplier recommendation.

(d) verification of the implementation of the disposition.

(e) maintenance of records of Supplier-submitted nonconformances.

4.7.6 COMMERCIAL GRADE ITEMS AND SERVICES

When commercial grade items or services are utilized, PPG PMC can utilize the requirements of this section for procurement and acceptance of items or services as an acceptable alternative to sections 4.7.2 through 4.7.5 of this Requirement, except that Supplier evaluation and selection, where determined necessary by PPG PMC, shall be in accordance with section 4.7.2 of this Requirement. The applicable requirements of this Standard shall apply to dedication activities for acceptance.

EPRI, NP-5652, Guidelines for the Commercial Grade Items in Safety-Related Applications is used as a model for procedures associated with this requirement.

4.7.6.1 Utilization

The utilization of commercial grade items or services shall include the following:

- technical evaluation to determine that the item or service performs a safety function
- confirmation that the item or service meets the commercial grade definition criteria
- identification of the critical characteristics, including acceptance criteria
- selection, performance, and documentation of the dedication method(s) for determining compliance with acceptance criteria

When one or more critical characteristics for acceptance cannot be verified by the dedication methods, the requirements of this section shall not be utilized to procure and accept the commercial grade item or service.

4.7.6.2 Critical Characteristics

Critical characteristic selection for acceptance shall address the following:

(a) identifiable and measurable attributes or variables appropriate for the safety function

(b) criteria related to the location of the item in the facility or criteria addressing the most severe location of the item in the facility, unless controls are in place to prevent usage in undesignated locations

4.7.6.3 Dedication

PPG PMC shall provide reasonable assurance that the commercial grade item or service meets the acceptance criteria for the identified critical characteristics by inspections, tests, or analyses performed after delivery, supplemented as necessary by one or more of the following:

- commercial grade survey of the Supplier
- source verification of the item or service
- acceptable supplier item performance record

Prior to acceptance of the commercial grade item or service, PPG PMC shall determine the following, as applicable:

- damage was not sustained during shipment
- the item or service has satisfied the specified acceptance criteria for the identified critical characteristics
- specified documentation was received and is acceptable

4.7.6.4 Commercial Grade Survey

A commercial grade survey is performed in accordance with a checklist or plan at the Supplier's facility and includes or addresses the following:

- identification of the item, or product, or service included within the scope of the survey
- identification of the critical characteristics to be controlled by the Supplier
- verification of the Supplier's processes and quality program controls are effectively implemented for control of the critical characteristics
- identification of the survey methods or verification activities performed and results
- documentation of the adequacy of the Supplier's processes and controls

A commercial grade survey shall not be employed as a supplemental basis for accepting commercial grade items or services from Suppliers with undocumented quality programs or with programs that do not effectively implement the Supplier's own specified processes and controls. After a Supplier's processes and controls have been determined to be adequate, the dedicating entity shall invoke or reference the verified processes and controls as a part of the purchase order or control requirements for the commercial grade item or service and require the Supplier to provide a Certificate of Conformance attesting to the implementation of the identified processes and controls.

The dedicating entity shall establish the survey frequency for reconfirming the previous survey information for application to additional purchases.

4.7.6.5 Source Verification

Source verification is only applicable to the actual item(s) or service(s) that are verified at the Supplier's facility or other applicable location. Source verification shall include a checklist or plan with the documented evidence of the source verification furnished to the dedicating entity and shall include or address the following:

- (a) identification of the item(s) or service(s) included within the scope of the source verification
- (b) identification of the critical characteristics, including acceptance criteria, to be controlled by the Supplier
- (c) verification of the Supplier's processes and controls are effectively implemented for the identified critical characteristics
- (d) identification of the activities witnessed during the source verification and the results obtained
- (e) documentation of the adequacy of the Supplier's processes and controls

4.7.6.6 Acceptable Product Performance Records

An acceptable product performance record shall include the following:

- identification of the supplier product being evaluated
- identification of previously established critical characteristics specific to the product
- identification of industry data examined for the evaluation
- identification of basis for determining that industry data substantiates acceptability of the product
- documentation of the adequacy and acceptance of the product performance record

An acceptable product performance record shall not be employed unless:

- the established historical record is based on industry-wide performance data that is directly applicable to the critical characteristics and the intended facility application, i.e., a single source of information is not adequate to demonstrate satisfactory performance
- the manufacturer measures for the control of applicable design, process, and material change have been accepted by the dedicating entity
- continued application of an acceptable performance record shall include a documented periodic update and review to assure the product maintains an acceptable performance record.

4.7.6.7 Supplier Deficiency Correction

Deficiencies identified in the Supplier's processes and controls identified in the dedication process shall be corrected by the Supplier and verified by the dedicating entity, if the specified dedication process is to be used to verify an identified critical characteristic.

4.7.7 RECORDS

Records shall be established and maintained to indicate the performance of the following functions:

- supplier evaluation and selection
- acceptance of items or services
- supplier nonconformances to procurement document requirements, including their evaluation and disposition
- utilization and acceptance of commercial grade items

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.8 Identification and Control of Items

4.8.1 BASIC

Controls shall be established to assure that only correct and accepted items are used or installed. Identification shall be maintained on the items or in documents traceable to the items, or in a manner that assures that identification is established and maintained.

4.8.2 IDENTIFICATION METHODS

4.8.2.1 Item Identification

Items of production (batch, lot, component, part) shall be identified from the initial receipt and fabrication of items up to and including installation and use. This identification shall relate an item to an applicable design or other pertinent specifying document.

4.8.2.2 Physical Identification

Physical identification shall be used to the maximum extent possible. Where physical identification on the item is either impractical or insufficient, physical separation, procedural control, or other appropriate means shall be employed. Identification markings shall be applied using materials and methods that provide a clear and legible identification and do not degrade the function or service life of the item. Markings shall be transferred to each part of an identified item when subdivided and shall not be obliterated or hidden by surface treatment or coating unless other means of identification are substituted.

4.8.3 SPECIFIC REQUIREMENTS

4.8.3.1 Identification and Traceability of Items

When codes, standards, or specifications include specific identification or traceability requirements (such as identification or traceability of the item to applicable specification and grade of material; heat, batch, lot, part, or serial number; or specified inspection, test, or other records), the program shall provide such identification and traceability control.

4.8.3.2 Limited Life Items

Items having limited calendar or operating life or cycles shall be identified and controlled to preclude use of items whose shelf life or operating life has expired.

4.8.3.3 Maintaining Identification of Stored Items

Provisions shall be made for the control of item identification consistent with the planned duration and conditions of storage, such as:

- provisions for maintenance or replacement of markings and identification records due to damage during handling or aging
- protection of identifications on items subject to excessive deterioration due to environmental exposure
- provisions for updating existing plant records

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.9 Control of Special Processes

4.9.1 BASIC

Not applicable. PPG PMC does not use special processes that control or verify quality, such as those used in welding, heat treating, and nondestructive examination.

Documents/Records

Not applicable, PPG PMC does not use special processes.

4.10 Inspection

4.10.1 BASIC

Inspections required to verify conformance of an item or activity to specified requirements or continued acceptability of items in service shall be planned and executed. Characteristics subject to inspection and inspection methods shall be specified. Inspection results shall be documented. Inspection for acceptance shall be performed by qualified persons other than those who performed or directly supervised the work being inspected.

4.10.2 INSPECTION REQUIREMENTS

Inspection requirements and acceptance criteria shall include specified requirements contained in the applicable design documents or other pertinent technical documents approved by the responsible design organization.

4.10.3 INSPECTION HOLD POINTS

If mandatory inspection hold points are required beyond which work shall not proceed without the specific consent of the designated representative, the specific hold points shall be indicated in appropriate documents. Consent to waive specified hold points shall be recorded prior to continuation of work beyond the designated hold point.

4.10.4 INSPECTION PLANNING

4.10.4.1 Planning

Characteristics to be inspected, methods of inspection, and acceptance criteria shall be identified during the inspection planning process.

4.10.4.2 Sampling

Sampling procedures, when used, shall be based upon standard statistical methods with engineering approval.

4.10.5 IN-PROCESS INSPECTION

Inspection of items under construction or otherwise in process shall be performed as necessary to verify quality. If inspection of processed items is impossible or disadvantageous, indirect control by monitoring of processing methods, equipment, and personnel shall be provided. Process monitoring shall be performed by qualified personnel or qualified automated means. Both inspection and process monitoring shall be provided when control is inadequate without both.

4.10.6 FINAL INSPECTIONS

4.10.6.1 Resolution of Nonconformances

Final inspections shall include a records review of the results and resolution of nonconformances identified by prior inspections.

4.10.6.2 Inspection Requirements

Completed items shall be inspected for completeness, markings, calibration, adjustments, protection from damage, or other characteristics as required to verify the quality and conformance of the item to specified requirements.

4.10.6.3 Modifications, Repairs, or Replacements

Any modifications, repairs, or replacements of items performed subsequent to final inspection shall require reinspection or retest, as appropriate, to verify acceptability.

4.10.6.4 Acceptance

The acceptance of the item shall be approved by authorized personnel.

4.10.7 INSPECTIONS DURING OPERATIONS

Periodic inspections (e.g., in-service inspections) or surveillances of structures, systems, or components shall be planned and executed to assure the continued performance of their required functions.

4.10.8 RECORDS

Appropriate records shall be established, maintained, and, as a minimum, identify the following:

- item inspected
- date of inspection
- inspector
- type of observation
- results or acceptability
- reference to information on action taken in connection with nonconformances

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.11 Test Control

4.11.1 BASIC

Tests required to collect data such as for siting or design input, to verify conformance of an item or computer program to specified requirements, or to demonstrate satisfactory performance for service shall be planned and executed. Characteristics to be tested and test methods to be employed shall be specified. Test results shall be documented and their conformance with test requirements and acceptance criteria shall be evaluated.

4.11.2 TEST REQUIREMENTS

Test requirements and acceptance criteria shall be provided or approved by the responsible design organization. Required tests, including, as appropriate, prototype qualification tests, production tests, proof tests prior to installation, construction tests, preoperational tests, operational tests, and computer program tests such as software design verification, factory acceptance tests, site acceptance tests, and in-use tests shall be controlled.

Computer program tests including, as appropriate, software design verification, factory acceptance tests, site acceptance tests, and in-use tests shall be controlled.

Required tests shall be controlled under appropriate environmental conditions using the tools and equipment necessary to conduct the test in a manner to fulfill test requirements and acceptance criteria. The tests performed shall obtain the necessary data with sufficient accuracy for evaluation and acceptance.

Test requirements and acceptance criteria shall be based upon specified requirements contained in applicable design documents, or other pertinent technical documents that provide approved requirements.

If temporary changes to the approved configuration of a facility are required for testing purposes, approval by the design authority is required prior to performing the test.

4.11.3 TEST PROCEDURES (OTHER THAN FOR COMPUTER PROGRAMS)

Test procedures shall include or reference the test configuration and test objectives. Test procedures shall also include provisions for assuring that prerequisites and suitable environmental conditions are met, adequate instrumentation is available and used, appropriate tests and equipment are used, and necessary monitoring is performed. Prerequisites shall include the following, as applicable:

- calibrated instrumentation
- appropriate equipment
- trained personnel

- condition of test equipment and the item to be tested
- suitable environmental conditions
- provisions for data acquisition

As an alternative to 4.11.3, appropriate sections of related documents, such as ASTM methods, supplier manuals, equipment maintenance instructions, or approved drawings or travelers with acceptance criteria, may be used. Such documents shall include or be supplemented with appropriate criteria to assure adequate procedures for the test.

4.11.4 COMPUTER PROGRAM TEST PROCEDURES

PPG PMC does not use computer programs for design or in-use testing.

4.11.5 TEST RESULTS

Test results shall be documented and evaluated by a responsible authority to ensure that test requirements have been satisfied. Test results for design qualification tests and software design verification shall be evaluated by the responsible design organization.

4.11.6 TEST RECORDS

Test records shall be established and maintained to indicate the ability of the item or computer program to satisfactorily perform its intended function or to meet its documented requirements. Test records vary depending on the test type, purpose, and application, but shall contain the following information, as a minimum:

Test Records

- (a) item tested
- (b) date of test
- (c) tester or data recorder
- (d) type of observation
- (e) results and acceptability
- (f) action taken in connection with any deviations
- (g) person evaluating test results

Computer Program Test Records

(a) Verification Test Records

- (1) Not applicable. PPG PMC does not use computer programs for design or in-use testing.

In-Use Test Records

(1) Not applicable. PPG PMC does not use computer programs for design or in-use testing.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.12 Control of Measuring and Test Equipment

4.12.1 BASIC

Tools, gages, instruments, and other measuring and test equipment used for activities affecting quality shall be controlled, calibrated at specific periods, adjusted, and maintained to required accuracy limits.

4.12.2 SELECTION

Selection of measuring and test equipment shall be based on the type, range, accuracy, and tolerance needed to accomplish the required measurements for determining conformance to specified requirements.

4.12.3 CALIBRATION AND CONTROL

4.12.3.1 Calibration

Measuring and test equipment shall be calibrated, at prescribed times or intervals and whenever the accuracy of the measuring and test equipment is suspect. Calibration shall be against and traceable to certified equipment or reference standards having known valid relationships to nationally recognized standards, or to international standards known to be equivalent to and verified against corresponding nationally recognized standards. Where no such standards exist, the basis for calibration shall be defined.

4.12.3.2 Reference Standards

Reference standards shall have a minimum accuracy four times greater than that of the measuring and test equipment being calibrated to ensure that the reference standards contribute no more than one-fourth of the allowable calibration tolerance. Where this 4:1 ratio cannot be maintained, the basis for selection of the standard in question shall be technically justified.

4.12.3.3 Control

Calibration procedures shall identify or reference required accuracy and shall define methods and frequency of checking accuracy. The calibration method and interval of calibration shall be based on the type of equipment, stability characteristics, required accuracy, intended use, and other conditions affecting performance. Measuring and test equipment, which is overdue for calibration or found to be out-of-calibration, shall be tagged and/ or segregated, or removed from service, and not used until it has been recalibrated. Measuring or test equipment consistently found to be out-of-calibration shall be repaired or replaced.

Application - Measuring and test equipment shall be traceable to its application and use.

Corrective Action - When measuring and test equipment is lost, damaged, or found to be out-of-calibration, the validity of previous measurement, inspection, or test results, and the acceptability of items previously inspected or tested shall be evaluated. This evaluation shall be from at least the last acceptable calibration of the M&TE. The evaluation and resulting actions shall be commensurate with the significance of the condition.

Handling and Storage - Measuring and test equipment shall be properly handled and stored to maintain accuracy.

Environmental Controls - Measuring and test equipment shall be used and calibrated in environments that are controlled to the extent necessary to ensure that the required accuracy and precision are maintained.

Pre-calibration Checks - Measuring and test equipment and reference standards submitted for calibration shall be checked and the results recorded before any required adjustments or repairs are made.

Status Indication - Measuring and test equipment shall be suitably marked, tagged, labeled, or otherwise identified to indicate calibration status and establish traceability to calibration records.

Commercial Devices - Calibration and control measures are not required for commercial equipment such as rulers, tape measures, levels, etc., if such equipment provides the required accuracy.

4.12.4 RECORDS

4.12.4.1 General

Records shall be established and maintained to indicate calibration status and the capability of measuring and test equipment to satisfactorily perform its intended function.

4.12.4.2 Reports and Certificates

Calibration reports and certificates reporting the results of calibrations shall include the information and data necessary for interpretation of the calibration results and verification of conformance to applicable requirements.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.13 Handling, Storage, and Shipping

4.13.1 BASIC

Handling, storage, cleaning, packaging, shipping, and preservation of items shall be controlled to prevent damage or loss and to minimize deterioration. These activities shall be conducted in accordance with established work and inspection instructions, drawings, specifications, shipment instructions, or other pertinent documents or procedures specified for use in conducting the activity.

4.13.2 SPECIAL REQUIREMENTS

When required, special equipment (such as containers, shock absorbers, and accelerometers) and special protective environments (such as inert gas atmosphere, specific moisture content levels, and temperature levels) shall be specified and provided and their existence verified.

4.13.3 PROCEDURES

When required for critical, sensitive, perishable, or high-value items, specific procedures for handling, storage, packaging, shipping, and preservation shall be used.

4.13.4 TOOLS AND EQUIPMENT

Special handling tools and equipment shall be utilized and controlled where necessary to ensure safe and adequate handling. Special handling tools and equipment shall be inspected and tested in accordance with procedures at specified time intervals or prior to use.

4.13.5 OPERATORS

Operators of special handling and lifting equipment shall be experienced or trained in the use of the equipment.

4.13.6 MARKING OR LABELING

Marking or labeling shall be utilized as necessary to adequately maintain and preserve the item, including indication of the presence of special environments or the need for special controls.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

14.14 Inspection, Test, and Operating Status

The status of inspection and test activities shall be identified either on the items or in documents traceable to the items where it is necessary to ensure that required inspections and tests are performed and to ensure that items that have not passed the required inspections and tests are not inadvertently installed, used, or operated. Status shall be maintained through indicators, such as physical location and tags, markings, shop travelers, stamps, inspection records, or other suitable means. The authority for application and removal of tags, markings, labels, and stamps shall be specified.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.15 Control of Nonconforming Items

4.15.1 BASIC

Items that do not conform to specified requirements shall be controlled to prevent inadvertent installation or use. Controls shall provide for identification, documentation, evaluation, segregation when practical, and disposition of nonconforming items, and for notification to affected organizations.

4.15.2 IDENTIFICATION

Nonconforming items shall be identified by legible marking, tagging, or other methods not detrimental to the item, on either the item, the container, or the package containing the item.

4.15.3 SEGREGATION

Nonconforming items shall be segregated, when practical, by placing them in a clearly identified and designated hold area until properly dispositioned.

When segregation is impractical or impossible due to physical conditions such as size, weight, or access limitations, other precautions shall be employed to preclude inadvertent use of a nonconforming item.

4.15.4 DISPOSITION

4.15.4.1 Control

Nonconforming items shall be evaluated and recommended dispositions shall be proposed. Further processing, delivery, installation, or use of a nonconforming item shall be controlled pending the evaluation and an approved disposition by authorized personnel.

4.15.4.2 Responsibility and Authority

The responsibility and authority for the evaluation and disposition of nonconforming items shall be defined. Responsibility for the control of further processing, delivery, installation, or use of nonconforming items shall be designated in writing.

4.15.4.3 Personnel

Personnel performing evaluations to determine a disposition shall have:

- demonstrated competence in the specific area they are evaluating
- an adequate understanding of the requirements
- access to pertinent background information

4.15.4.4 Disposition

PPG PMC does not use dispositions of rework, repair, or use-as-is for any non-conforming safety related products. Non-conforming safety related products are rejected and can be reworked under the ISO9001 quality program into non-safety related products if applicable.

4.15.4.5 Reexamination

Not applicable. PPG PMC does not rework safety related products.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.16 Corrective Action

Conditions adverse to quality shall be identified promptly and corrected as soon as practical. In the case of a significant condition adverse to quality, the cause of the condition shall be determined and corrective action taken to preclude recurrence. The identification, cause, and corrective action for significant conditions adverse to quality shall be documented and reported to appropriate levels of management. Completion of corrective actions shall be verified.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.17 Quality Assurance Records

4.17.1 BASIC

The control of quality assurance records shall be established consistently with the schedule for accomplishing work activities. Quality assurance records shall furnish documentary evidence that items or activities meet specified quality requirements. Quality assurance records shall be identified, generated, authenticated, and maintained, and their final disposition specified. Record control requirements and responsibilities for these activities shall be documented.

4.17.2 GENERATION OF RECORDS

Records shall be legible. Records shall be traceable to associated items and activities and accurately reflect the work accomplished or information required. Records to be generated, supplied, or maintained shall be specified in applicable documents, such as design specifications, procurement documents, test procedures, and operational procedures.

4.17.3 AUTHENTICATION OF RECORDS

Documents shall be considered valid records only if stamped, initialed, or signed and dated by authorized personnel or otherwise authenticated. Corrections to documents shall be reviewed and approved by the responsible individual from the originating or authorized organization.

Electronic documents shall be authenticated with comparable information, as appropriate with identification on the media or authentication information contained within or linked to the document itself.

4.17.4 CLASSIFICATION

Records shall be classified as lifetime or nonpermanent. These records shall be maintained by the owner, or authorized agent, in accordance and consistent with applicable regulatory requirements.

4.17.4.1 Lifetime Records

Lifetime records are those that meet one or more of the following criteria:

- those that would be of significant value in demonstrating capability for safe operation
- those that would be of significant value in maintaining, reworking, repairing, replacing, or modifying an item
- those that would be of significant value in determining the cause of an accident or malfunction of an item
- those that provide required baseline data for in-service inspections

Lifetime records are required to be maintained by or for the owner for the life of the particular item while it is installed in the plant or stored for future use.

4.17.4.2 Nonpermanent Records

Nonpermanent records are those required to show evidence that an activity was performed in accordance with the applicable requirements but need not be retained for the life of the item because they do not meet the criteria for lifetime records. Nonpermanent records shall be maintained for the identified retention period.

4.17.5 RECEIPT CONTROL OF RECORDS

Personnel responsible for the receipt of records are designated. The designees shall be responsible for organizing and implementing receipt controls for permanent and temporary storage. Receipt controls shall provide a method for identifying the records received, receipt and inspection of incoming records, and submittal of records to storage.

4.17.6 STORAGE

Records shall be stored at predetermined locations in facilities, containers, or a combination thereof, constructed and maintained in a manner that minimizes the risk of loss, damage, or destruction from

- natural disasters such as winds, floods, or fires
- environmental conditions such as high and low temperatures and humidity
- infestation of insects, mold, or rodents
- dust or airborne particles

Activities detrimental to the records shall be prohibited in the storage area. Access to the processing, storage, and retrieval of records shall be limited to authorized personnel.

Provisions shall be made to prevent damage from harmful conditions (such as excessive light, stacking, electromagnetic fields, temperature, and humidity), as applicable to the specific media utilized for record storage.

4.17.6.1 Facility Types

There are two equally satisfactory methods of providing storage, single or dual.

Single storage consists of a storage facility, vault, room, or container(s) with a minimum two-hour fire rating. The design and construction of a single storage facility, vault room, or container shall be reviewed for adequacy by a person competent in fire protection or contain a certification or rating from an accredited organization.

Dual facilities, containers, or a combination thereof shall be at locations sufficiently remote from each other to eliminate the chance exposure to a simultaneous hazard. Facilities used for dual storage must meet the general storage requirements.

Temporary Storage

When temporary storage of records (such as for processing, review, or use) is required, the storage facility or container shall provide a one-hour fire rating, unless dual storage requirements are met.

4.17.7 RETENTION

Record retention periods shall be documented and records shall be maintained for their retention periods.

4.17.8 MAINTENANCE OF RECORDS

Records shall be protected from damage or loss. Record controls shall provide for retrievability within planned retrieval times based upon the record type or content. The methods for record changes shall be documented.

Provisions shall be established to ensure that no unacceptable degradation of the electronic record media occurs during the established retention period. Provisions shall be made to ensure that the records remain retrievable after hardware, software, or technology changes.

Provisions shall be established to ensure the following when records are duplicated or transferred to the same media or to a different media for the purposes of maintenance or storage duplication or transfer is appropriately authorized and record content, legibility, and retrievability are maintained.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

4.18 Audits

4.18.1 BASIC

Audits shall be performed to verify compliance to quality assurance program requirements, to verify that performance criteria are met, and to determine the effectiveness of the program. These audits shall be performed in accordance with written procedures or checklists by personnel who do not have direct responsibility for performing the activities being audited. Audit results shall be documented and reported to and reviewed by responsible management. Follow-up action shall be taken where indicated.

4.18.2 SCHEDULING

Audits shall be scheduled in a manner to provide coverage and coordination with ongoing activities, based on the status and importance of the activity. Scheduled audits shall be supplemented by additional audits of specific subjects when necessary to provide adequate coverage.

4.18.3 PREPARATION

Audit Plan

The auditing organization shall develop an audit plan for each audit. This plan shall identify the audit scope, requirements, audit personnel, activities to be audited, organizations to be notified, applicable documents, schedule, and written procedures or checklists.

Personnel

Audit personnel shall have sufficient authority and organizational freedom to make the audit process meaningful and effective.

Selection of Audit Team

An audit team shall be identified prior to the beginning of each audit. This team shall contain one or more Auditors, one being designated Lead Auditor who organizes and directs the audit. The audit team shall have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited.

4.18.4 PERFORMANCE

Elements selected for audit shall be evaluated against specified requirements. Objective evidence shall be examined to the depth necessary to determine if these elements are being implemented effectively. Conditions requiring prompt corrective action shall be reported immediately to management of the audited organization.

4.18.5 REPORTING

The audit report shall be signed or otherwise endorsed by the Lead Auditor and issued to the audited organization. The contents of the report shall

- describe the audit scope
- identify Auditors and persons contacted
- summarize audit results, including a statement on the effectiveness of the elements audited
- describe each reported adverse audit finding

4.18.6 RESPONSE

Management of the audited organization or activity shall investigate adverse audit findings, schedule corrective action, including measures to prevent recurrence of significant conditions adverse to quality, and notify the appropriate organization in writing of action taken or planned. Audit responses shall be evaluated by or for the auditing organization.

4.18.7 FOLLOW-UP ACTION

Follow-up action shall be taken to verify that corrective action is accomplished as scheduled.

4.18.8 RECORDS

Audit records shall include audit plans, audit reports, written replies, and the record of completion of corrective action.

Documents/Records

Documents/Records generated, related to this section, are controlled in accordance with Sections 4.6 and/or 4.17 of this manual and their supporting work instructions.

