

Administrative Procedure

# CPCC-PRO-QA-301

## Control of Suspect/Counterfeit and Defective Items

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Program: Quality Assurance

Topic: Quality Assurance

Technical Authority: Webb, Michael A

Functional Manager: Skerbetz, Joseph R

## Use Type: Administrative



USQ Facility	USQ Review	Screener
105 KW Facility	GCX-2 (Editorial Changes)	Meyer, Matthew F
324 Building	GCX-2 (Editorial Changes)	Garrett, Robert J
Canister Storage Building/Interim Storage Area	GCX-2 (Editorial Changes)	Garrett, Robert J
Capsule Storage Area	GCX-2 (Editorial Changes)	Garrett, Robert J
D4ES-Central Plateau	GCX-2 (Editorial Changes)	Dubois, Valerie M
Solid Waste Operations Complex	GCX-7 (Minor Change)	Masulonis, John U
Transportation	<b>Exclusion Reason:</b> <i>N/A per Section 1.3.</i>	
Waste Encapsulation Storage Facility	GCX-2 (Editorial Changes)	Garrett, Robert J

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## Change Summary

### Description of Change

Update Table of Contents along with Responsibilities sections to change QA Director to QA Manager.

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### 1.0 INTRODUCTION

#### 1.1 Purpose

This procedure implements portions of the requirements of CPCC-MP-QA-599, *Quality Assurance Program*. It establishes the Central Plateau Cleanup Company (CPCCo) practices for preventing the introduction of and identifying, documenting, dispositioning, reporting, controlling, and disposing of Suspect/Counterfeit and Defective Items (S/CI).

**NOTE:** *Terms used in this procedure are defined in [Appendix A](#).*

#### 1.2 Scope

CPCCo implements an effective Quality Assurance (QA) Program providing a comprehensive network of controls and verification providing defense-in-depth by preventing the introduction of S/CIs through the design, procurement, construction, operation, maintenance, and modification processes. This procedure focuses on those safety systems, and other systems, including critical load paths of lifting equipment, where the introduction of S/CIs would have the greatest potential for creating unsafe conditions.

#### 1.3 Applicability

This procedure applies to CPCCo employees whose work scope relates to safety systems (i.e., safety class [SC] or safety significant [SS] items), non-safety systems and other applications (i.e., General Service [GS]) where engineering has determined the use of S/CI could result in a potential safety hazard or project risk.

#### 1.4 Implementation

This procedure is effective upon publication.

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**2.0 RESPONSIBILITIES****2.1 QA Manager**

- Appoints an S/CI Technical Authority (S/CI TA).

**2.2 S/CI TA**

- Requests assignment of S/CI points of contact (POC) from Quality Systems Manager.
- Maintains a listing of facility/project/functional organization S/CI POCs for CPCCo-wide reference.
- Acts as S/CI CPCCo point of contact for U.S. Department of Energy (DOE) and outside oversight organizations.

**2.3 S/CI POC**

- Coordinates S/CI activities within the assigned facility/project/functional organization.
- Supports S/CI TA relative to S/CI issues and activities.
- Acts as focal point and information resource for facility/project/functional organization personnel relative to the CPCCo S/CI program.

**2.4 Personnel Acquiring/Procuring Items or Services**

- Ensures acquisition/procurement of items/services (including rental equipment)/subcontracts include appropriate training requirements, technical specifications, procurement quality clauses documentation requirements, e.g., certified material test reports (CMTR), and inspection requirements to prevent the entry of S/CIs on site.

**2.5 PCard Holder/End User**

- Ensures items procured with a PCard and received meet the description and requirements as specified on the procurement documentation.
- Ensures items don't exhibit indicators that are attributed to S/CI as described in [IAEA TECHDOC-1169](#), *Managing S/CI in the Nuclear Industry*.
- Ensures CPCC-PRO-AC-335, *Use and Control of Purchasing Card*, requirements are followed.

**2.6 Design Authority, Technical Authority, and/or QA Representative**

- Ensures development of inspection and testing criteria, testing methods, Quality Assurance Inspection Plan (QAIP)/checklists that include specific characteristics for detection of S/CIs, as required by CPCC-PRO-QA-268, *Control of Purchased/Acquired Items and Services*.
- Ensures provisions for the detection, identification, control, reporting, evaluation, and disposition of S/CIs are included in facility/project work control documents involving safety related applications; or other applications that create safety hazards or project risk, as determined by the Design Authority. Items described within [IAEA TECHDOC-1169](#) should be considered for S/CI controls.

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**2.7 Buyer and/or Contract Specialist**

- Procures items as requested and ensures that all requirements in the statement of work/purchase requisition, including receipt inspection, are flowed down to the subcontractor, as well as the flow-down of appropriate general provisions concerning S/CI to prevent entry on site.

**2.8 Inspection Personnel**

- Verifies and documents that items being inspected avoid exhibiting indicators attributed to S/CIs as described in IAEA TECHDOC-1169 as required by the governing work control document.

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### 3.0 PROCESS

#### 3.1 Identification, Control, Reporting, and Documentation

Actionee	Step	Action
Non-QA Personnel	1.	<u>WHEN</u> S/CI are discovered by individuals other than QA personnel, <u>THEN</u> immediately NOTIFY responsible QA personnel.
QA Personnel	2.	<u>WHEN</u> S/CIs are discovered, <u>THEN</u> ENSURE completion of the following: <ol style="list-style-type: none"> <li>a. INITIATE a nonconformance report (NCR) in accordance with CPCC-PRO-QA-298, <i>Nonconforming Items</i>.</li> <li>b. <u>IF</u> suspect/counterfeit fasteners are involved, <u>THEN</u> COMPLETE a <i>Suspect Fastener Headmark Report</i> (Site Form BC-6000-853) <u>AND</u> ATTACH to the NCR.</li> </ol>
Facility/ Project QA Reps	3.	NOTIFY manager of the facility/project where the S/CIs were discovered <u>AND</u> TRANSMIT NCR for disposition in accordance with CPCC-PRO-QA-298. <ol style="list-style-type: none"> <li>a. <u>IF</u> the NCR is generated at receiving inspection, <u>THEN</u> NOTIFY the Facility/Project QA manager responsible for the procurement action <u>AND</u> TRANSMIT the NCR for processing in accordance with CPCC-PRO-QA-298.</li> </ol>
	4.	ENSURE S/CIs continue to be controlled, subsequent to their identification, pending formal disposition including application and removal of status indicator tags. Application and maintenance of status tags is performed in accordance with CPCC-PRO-QA-297, <i>Inspection, Test and Operating Status</i> .
	<b>NOTE:</b>	<i>CPCC-PRO-EM-060, Reporting Occurrences and Processing Operations Information, requires event categorization within 2 hours of validating a suspect/counterfeit item exists.</i>
Facility/Project Managers	5.	Once an item has been confirmed to be suspect/counterfeit through the NCR validation process, EVALUATE NCR to determine reporting requirements of CPCC-PRO-EM-060, <i>Reporting Occurrences and Processing Operations Information</i> .
Design Authority/ Technical Authority	6.	DISPOSITION NCRs in accordance with CPCC-PRO-QA-298.

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Actionee	Step	Action
<b>NOTE:</b>	<ul style="list-style-type: none"> <li>If after Engineering evaluation, it has been determined to allow installed S/CIs to remain in place, where practical, they must be indelibly marked with florescent paint.</li> <li>The Office of Inspector General (OIG) requires all S/CIs to be reported within 3 working days of the date of confirmation. Providing the S/CI TA with the information within 2 working days provides time to process and transmit the information within the 3-day window.</li> </ul>	
NCR, OR Originators	7.	PROVIDE a copy of the NCR, Occurrence Report (OR), if applicable, and other pertinent documents/reports to the S/CI TA within 2 working days of S/CI confirmation via NCR validation.
S/CI TA	8.	<p>Within 3 working days of confirmation, REPORT all S/CI to the DOE-RL Contracting Officer via electronic mail to the following:</p> <ul style="list-style-type: none"> <li>RL, Office of the Assistant Manager for Safety and Quality – Quality Assurance Division Director</li> <li>Office of the Assistant Manager for Safety and Quality – Quality Assurance Specialist and Department of Energy Office of Inspector General (OIG) IGHOTLINE <a href="mailto:ighotline@hq.doe.gov">ighotline@hq.doe.gov</a>.</li> </ul>
Facility/Project Managers	9.	ENSURE the rejected S/CI is packaged with a copy of the NCR, identified with a "HOLD" tag in accordance with CPCC-PRO-QA-297, and transported to Bldg. 2101M for storage pending disposal.
<b>NOTE:</b>	<i>On occasion, it is acceptable for the S/CI TA to take custody of S/CI for training or display purposes. On these occasions, the S/CI TA will ensure traceability by indicating transfer from the hold location to secure storage of the item(s) in a locked cabinet in his office.</i>	
2101M Warehouse Personnel	10.	Upon receipt, PLACE the S/CI in controlled storage pending authorization for disposal from the S/CI TA.
<b>NOTE:</b>	<i>S/CIs that have been contaminated are packaged and disposed of, when permitted, in accordance with governing facility/project-specific waste management procedures.</i>	
S/CI TA	11.	ENSURE OIG authorization is obtained prior to destroying or disposing of S/CIs.
S/CI POCs	12.	ENSURE QA schedules <u>AND</u> PERFORM surveillance of facility/project implementation of S/CI controls, within each POC's assigned scope of responsibility, as specified via this procedure, at least once a year.



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Actionee	Step	Action
<b>NOTE:</b> <i>Additional unscheduled QA facility/project related surveillances may also be required due to new S/CI discoveries or concerns.</i>		
QA	13.	UTILIZE the lines of inquiry listed in the Standard QA Surveillance Checklist, as applicable to the facility/project being surveilled, located on the Quality Assurance website. Specific objective evidence reviewed during performance of the surveillance shall be documented in the resulting surveillance report.
Cognizant Managers	14.	ENSURE the documentation associated with S/CIs is complete and adequate.
	15.	ENSURE all records are controlled and transmitted in accordance with CPCC-PRO-IRM-10588, <i>Records Management Processes</i> .

### 3.2 Training

Actionee	Step	Action
<b>NOTE:</b> <i>Managers may solicit input from QA personnel to assist in the correct identification of the designated audience and training requirements.</i>		
Employee's Manager	1.	IDENTIFY <u>AND</u> ASSIGN employees, in job categories that have the potential to identify or make decisions regarding S/CI as part of their normal work scope, to attend appropriate S/CI training. This training shall include prevention, detection, processing, and disposition of S/CIs. The following job categories are within the scope of this training: <ol style="list-style-type: none"> <li>a. Facility, Project, and Construction Managers</li> <li>b. Operations Engineering Managers and Supervisors</li> <li>c. Engineering Managers</li> <li>d. Engineers (facility/project, component, design, maintenance, new construction, or modifications, procurement Design Authorities) and their supervisors</li> <li>e. Design Leads</li> <li>f. Quality Engineers and Inspectors</li> <li>g. Planners and Schedulers who perform planning activities</li> <li>h. Facility/Project Maintenance Managers/Supervisors</li> <li>i. Crafts (fitters, welders, mechanics, carpenters, machinists, millwrights, electricians, truck drivers, storekeepers, tool crib attendants, material coordinators, equipment operators, etc.)</li> </ol>

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<b>Actionee</b>	<b>Step</b>	<b>Action</b>
Employee's Manager	2.	scope includes onsite work, which falls into one or more of the job categories identified in step 3.2.1. <ol style="list-style-type: none"> <li>a. <u>IF</u> contract labor resource is identified as needing S/CI awareness training, <u>THEN ENSURE</u> they successfully complete course 170720, <i>Suspect Counterfeit Items</i>, training or equivalent as determined by CPCCo S/CI POC.               <ol style="list-style-type: none"> <li>1) ENSURE the following:                   <ul style="list-style-type: none"> <li>• They understand their responsibility to prevent S/CIs from entering the Hanford Site as a result of their work scope.</li> <li>• They are capable of identifying potential S/CI if they are encountered.</li> </ul> </li> <li>b. Contract Specialist</li> <li>c. Buyer's Technical representative (BTR)</li> <li>d. Occurrence Reporting personnel</li> <li>e. PCard Holders with the realistic expectation of ordering potential S/CI as determined and documented by responsible management</li> </ol> </li> </ol>
Employee's Manager/BTR	3.	CONSIDER S/CI training for contracted labor resources whose
Employee's Manager	4.	ENSURE completion of web-based S/CI refresher training, by designated personnel, within 1 year of successful completion of course 170720, and annually thereafter.

### 3.3 Trending

<b>Actionee</b>	<b>Step</b>	<b>Action</b>
Contractor & Quality Assurance POC	1.	REVIEW the NCR system monthly to monitor for S/CI and other trends in accordance with CPCC-PRO-24741, <i>Performance Analysis Process</i> .
	2.	PROCESS issues, improvement actions, and adverse trends, in accordance with CPCC-PRO-QA-052, <i>Issues Management</i> .
S/CI POCs and QA Reps	3.	REVIEW S/CI information for dissemination in accordance with CPCC-PRO-MS-067, <i>Lessons Learned</i> , and CPCC-PRO-QA-24741.

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**4.0 FORMS**BC-6000-853, *Suspect Fastener Headmark Report***5.0 RECORD IDENTIFICATION**

All records are required to be managed in accordance with CPCC-PRO-IRM-10588, *Records Management Processes*.

**Records Capture Table**

<b>Name of Record</b>	<b>Submittal Responsibility</b>	<b>Retention Responsibility</b>
Suspect Fastener Headmark Report, BC-6000-853	Initiating Organization	IRM Services Provider

**6.0 SOURCES****6.1 Requirements**CPCC-MP-QA-599, *Quality Assurance Program Description*DOE O 232.2, *Occurrence Reporting and Processing of Operations Information*DOE O 414.1D, *Quality Assurance*DOE O 433.1B (Supp), *Maintenance Management Program for DOE Nuclear Facilities***6.2 References**ASME NQA-1-2008, *Quality Assurance Requirements for Nuclear facility Applications*CPCC-PRO-AC-335, *Use and Control of Purchasing Card*CPCC-PRO-EM-060, *Reporting Occurrences and Processing Operations Information*CPCC-PRO-IRM-10588, *Records Management Processes*CPCC-PRO-MS-067, *Lessons Learned*CPCC-PRO-QA-052, *Issues Management*CPCC-PRO-QA-268, *Control of Purchased/Acquired Items and Services*CPCC-PRO-QA-297, *Inspection, Test and Operating Status*CPCC-PRO-QA-298, *Nonconforming Items*CPCC-PRO-QA-24741, *Performance Analysis Process*IAEA-TECHDOC-1169, *Managing S/CI in the Nuclear Industry***6.3 Bases**DOE O 414.1 2B, *Quality Assurance Program Guide*

PCard Holder's User Manual

Public Law 101-592, *Fastener Quality Act* (as amended by P.L. 104-113 and P.L. 105-234 and P.L. 106-34) 10 CFR 830.3, *Nuclear Safety Management Definitions*

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### Appendix A - Glossary

<i>Term</i>	<i>Definition</i>
<b>Critical Load Path</b>	A structural component (e.g., a bolt) in a crane, hoist, transporter, or other handling or lifting equipment that bears the load being lifted or moved and whose failure under tensile or shear stress could result in an operational safety problem or an unacceptable risk of injury to workers or the public.
<b>Defective Items (DI)</b>	<p>A defective item or material is any item or material that does not meet the commercial standard or procurement requirements as defined by catalogs, proposals, procurements specifications, design specifications, testing requirements, contracts, or the like. It does not include parts or services that fail or are otherwise found to be inadequate because of random failures or errors within the accepted reliability level.</p> <p>Manufacturers generally notify their customers when defective items are identified through such mechanisms as recall notices. Such notices may be directly sent to customers, or may appear in Federal agency or industry databases.</p> <p>DI contains items in which the defect appears to be due to an unintentional error in the manufacturing process. Defective items are often recalled by their manufacturers. Archived DI are also available. The link to defective items will contain certain recalls from the U.S. Consumer Product Safety Commission (CPSC) deemed significant and applicable to DOE operations. Defective Items will be processed in accordance with CPCC-PRO-QA-298.</p>
<b>Defense-in-Depth</b>	The multiplicity of design features, controls, and actions taken to ensure public and worker safety.

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<i>Term</i>	<i>Definition</i>
<b>Fastener</b>	<p>A metallic screw, nut, bolt, or stud having internal or external threads, with a nominal diameter of 6 millimeters or greater, in the case of such items described in metric terms, or ¼ inch or greater, in the case of such items described in terms of the English system or measurement, or a load-indicating washer, that is through-hardened or represented as meeting a consensus standard that calls for through-hardening, and that is grade identification marked or represented as meeting a consensus standard that requires grade identification marking.</p> <p>Many fasteners are exempt from the Fastener Quality Act (FQA) but not exempt from DOE S/CI requirements (e.g., manufacturer's headmark), including those that are:</p> <ul style="list-style-type: none"> <li>• Part of an assembly</li> <li>• A part that is ordered for use as a spare, substitute, service, or replacement part, unless that part is in a package containing more than 75 of any such part at the time of sale, or that is a part contained in an assembly kit</li> <li>• Produced and marked as ASTM A 307 Grade A, or a successor standard thereto</li> <li>• Produced in accordance with ASTM F 432, or a successor standard thereto</li> <li>• Specifically manufactured for use on an aircraft if the quality and suitability of those fasteners for that use has been approved <ul style="list-style-type: none"> <li>○ By the Federal Aviation Administration <u>or</u></li> <li>○ By a foreign airworthiness authority as described in part 21.29, 21.500, 21.502, or 21.617 of Title 14 of the <i>Code of Federal Regulations</i></li> </ul> </li> <li>• Manufactured in accordance with International Organization for Standardization (ISO); 9000, 9001, 9002, or TS16949; Quality System (QS) 9000; or other fastener quality assurance system defined by the law; or</li> <li>• Manufactured to a proprietary standard</li> <li>• If an accreditation organization chooses not to follow ISO guidelines for registration and accreditation, they may submit documents to the NIST director that establish its own guidance/requirements for: <ul style="list-style-type: none"> <li>○ Accredited bodies to register manufacturing systems as meeting FQA quality assurance requirements;</li> <li>○ Accreditation of testing laboratories; and</li> <li>○ Approval of accreditation bodies to accredit testing labs.</li> </ul> </li> </ul>

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<i>Term</i>	<i>Definition</i>
<b>Grade Identification</b>	Any symbol appearing on a fastener purporting to indicate that the fastener's base material, strength properties, or performance capabilities conform to a specific standard of a consensus standards organization or government agency.
<b>Graded Classifications</b>	A system used to determine the minimum requirements for structures, systems, and components (SSC) (e.g., design, operation, procurement, and maintenance requirements). The graded classifications in order of precedence are SC, SS, and GS.
<b>High Strength Graded Fastener</b>	Fasteners that are through-hardened or represented as meeting a consensus standard that requires through-hardening, and are grade identification marked or represented as meeting a consensus standard that requires grade identification marking. Examples of high strength graded fasteners include those produced and procured in accordance with the "Society of Automotive Engineers Standard J429," Grades 5, 5.2, 8, and 8.2; "ASTM Standard A325," Types 1, 2, and 3; ASTM A490, ASTM A354, ASTM A449 (I&II), and some ASTM F468. These fasteners must exhibit the manufacturer's headmark.
<b>Item</b>	<p>Per American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA)-1-2008. An all-inclusive term used in place of any of the following: appurtenance, assembly, component, equipment, material, module, part, structure, subassembly, subsystem, system, or unit.</p> <p>Per DOE O 414.1D. An all-inclusive term used in place of appurtenance, assembly, component, equipment, material, module, part, structure, product, software, subassembly, sub-system, system, unit, or support systems.</p>
<b>Nonsafety System</b>	A part or item not within the definition of a Safety System.
<b>Safety Class Structures, Systems, or Components (Safety Class SSC)</b>	The structures, systems, or components, including portions of process systems, whose preventive or mitigative function is necessary to limit radioactive hazardous material exposure to the public, as determined from safety analyses. (10 CFR 830.3)
<b>Safety Significant Structures, Systems, or Components (Safety Significant SSC)</b>	The structures, systems, or components that are not designated as safety class structures, systems, or components, but whose preventive or mitigative function is a major contributor to defense in depth/worker safety as determined from safety analyses. (10 CFR 830.3)

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<i>Term</i>	<i>Definition</i>
<b>Safety System</b>	<p>A DOE/ National Nuclear Security Administration (NNSA) nuclear and nonnuclear facility structure, system, or component whose preventive or mitigative function is a major contributor to defense-in-depth (i.e., prevention of uncontrolled material release) or worker safety as determined from hazard analysis. Also, a DOE structure, system, or component, including a primary environmental monitor or a portion of a process system, whose failure could adversely affect the environment, safety, or health of the public or workers.</p>
<b>Suspect/Counterfeit Item</b>	<p>An item is suspect when inspection or testing indicates that it may not conform to established government or industry-accepted specifications or national consensus standards or whose documentation, appearance, performance, material, or other characteristics may have been misrepresented by the vendor, supplier, distributor, or manufacturer. A counterfeit item is one that has been copied or substituted without legal right or authority or whose material, performance, or characteristics have been misrepresented by the vendor, supplier, distributor, or manufacturer. Avoid items conforming to established requirements that are not normally considered S/CIs if nonconformity results from one or more of the following conditions (which must be controlled by site procedures as nonconforming items):</p> <ul style="list-style-type: none"><li>• Defect resulting from inadequate design or production quality control</li><li>• High strength fasteners that do not exhibit the manufacturer's headmark</li><li>• Damage during shipping, handling, or storage</li><li>• Improper installation</li><li>• Deterioration during service</li><li>• Degradation during removal</li><li>• Failure resulting from aging or misapplication</li><li>• Other controllable causes</li></ul>

Source: CRD O 414.1D, *Quality Assurance*, Section 6, "Definitions"