



Example Procedure

Performance of Commercial Grade Surveys

Prepared by

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Note that this procedure was prepared for generic application. To make use of this procedure, organization specific information should be added as well as adaptation of site/project/facility specific job roles and responsibilities.

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1.0 Objective

This procedure establishes the process for planning, performing, and documenting surveys that are not based on nuclear quality program standards. The purpose of this procedure is to evaluate supplier activities at a specific location to determine the extent to which credit can be taken for the ability of the supplier to control activities associated with critical characteristics of commercial grade items and services.

The emphasis of commercial grade surveys is on an engineering driven performance based approach to supplier evaluation. Personnel are selected with knowledge of equipment safety function, critical characteristics and processes. Tailored checklists are prepared for each survey considering the scope of work. Evaluation of implementation of supplier processes is focused on activities which affect the safety function. These graded quality program elements are defined as part of the survey planning process.

2.0 Scope

This procedure applies to surveys associated with the dedication of commercial grade items (CGI) and commercial grade services (CGS).

3.0 Responsibilities

The roles and responsibilities of the organizations and personnel involved in the Commercial Grade Survey process for the items and services are summarized below. Identification of functional responsibilities is the important aspect of this section. It is recognized that individual organizations may use different titles, etc.

Procurement Engineering Manager (PEM)

- Selects personnel to perform the activities stated in this procedure and ensures that personnel are capable of performing tasks assigned.
- Assures that input has been received from the Subject Matter Experts (SME)
- Reviews, approves, and signs the survey plans and reports

Survey Team Lead and other assigned individuals

- Plans and performs the commercial grade survey and evaluates results for compliance with the dedication activities

4.0 Commercial Grade Survey

4.1 Survey Lead Qualification and Team Selection

The PEM assigns personnel to plan and perform the survey. The team is selected considering the safety function and significance of the scope of work and the critical characteristics and/or processes required

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for dedication based on the survey results. Performance based supplier evaluation requires that the team has the capability to make judgments on the suppliers activities to determine whether they provide an adequate confidence that the safety function will be performed. Therefore, the team must have the right mix or have access to the right mix of skills and knowledge. For example, a complex procurement may require several team members and a Survey Team Lead with extensive experience and qualifications in commercial grade dedication and performance of supplier evaluations. In other cases, the scope of the supplier evaluation may be such that a Survey Team Lead with strong technical skills and limited supplier evaluation experience, working with a well prepared checklist, may be the best choice.

The PEM evaluates the Survey Team Lead for the following criteria and documents the evidence of qualification on Attachment A, "Basis for Survey Personnel Capability". The Survey Team Lead is task qualified, so qualification only applies to the specific scope of the survey. Complex survey scopes and multi-person teams warrant a higher level of capability. For example, leading a survey of a manufacturer of a diesel generator may justify the need for the skills similar to a Lead Auditor. However, leading a survey of a supplier of a fabrication shop that cuts plate to defined shapes is capably performed by personnel with focused training for that scope. A well prepared checklist lessens the need for the Survey Team Lead level of skill necessary since the survey attributes and method of evaluation are clearly stated.

4.1.1 Communication Skills

The Survey Team Lead should be capable of communicating lines of inquiry to the supplier and accurately assimilating responses. The Lead should have writing skills adequate for capturing objective evidence and summarizing survey results in a report. The PEM should obtain and document evidence to demonstrate these skills. The evidence may be either written evidence of past performance or conduct of verbal interview, and documented accordingly.

4.1.2 Training and Knowledge

The PEM assures that the Survey Team Lead has a combination of training, experience and knowledge in:

- The technical attributes of the scope of items and/or services provided by the supplier
- Commercial grade dedication practices
- The QA processes relevant to the scope of the survey
- Techniques for conduct of inquiry, evaluating and reporting
- Coordinating the activities of survey participants

The PEM should document evidence of previous performance or conduct interviews to assess the Survey Team Lead training and knowledge in these areas. Typical evidence to consider are performance of commercial grade evaluations, survey, surveillance, education or training courses. Caution should be used when considering degrees, auditor certifications, class attendance records, etc., alone. More confidence is placed on review or observation of actual work performance.

4.1.3 Written examination or verbal interview

The PEM may conduct and document an interview or examination tailored to the scope of the survey in order to assess Survey Team Lead capability.

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4.2 Planning

The Survey Team shall review the anticipated scope of CGIs or CGSs and their intended application and determine the associated technical and quality requirements and critical processes for the CGI or CGS. If a CGD Plan has been processed, reference this as a source of the critical processes. Alternatively, the basis for selection of the critical processes is documented in the planning section of the CG Survey Checklist.

Sources of information include:

- Material requisitions
- Specifications
- Commercial Grade Dedication (CGD) Plan
- Safety classification documents
- Supplier QA program manuals/procedures

Note: A commercial grade survey shall not be employed as a basis for accepting CGIs or CGSs from suppliers with undocumented quality programs or with programs that do not effectively implement the supplier's specified processes and controls. Additional controls or oversight activities may be invoked contractually.

- 4.2.1** Considering the scope of the CGI and CGS, the team contacts SMEs such as Design Engineering, Quality Assurance, Information Technology (IT), Controls and Instrumentation (C&I), and Environmental Qualification, and requests input on the activities to evaluate and, if appropriate, participate in the survey.
- 4.2.2** The team member's review the Supplier's QA Manual and/or procedures, as necessary.
- 4.2.3** The Survey Team Lead makes arrangements with the supplier for conducting the survey. Ensure that the supplier understands the nature of the survey attributes to be investigated in order for the appropriate resources and personnel to be available. Determine the scope of work expected to be in-process at the time of the survey.
- 4.2.4** The team documents the background information on the CG Survey Checklist. Include references and sources of information, including SMEs.
- 4.2.5** The team develops the CG Survey Checklist based on the scope of the CGI or CGS and the attributes to be evaluated. The CG Survey Checklist contains those attributes that will result in a comprehensive review of the Supplier's program as appropriate for the scope of work. If the CGD Plan has been completed, the CG Survey Checklist attributes address the program criteria listed in the CGD Plan. These attributes shall include its critical characteristics and/or the Supplier's process/quality program controls critical to the safety function. Use of the CG Survey Checklist does not prevent performing other related activities of interest during the CG Survey. The CG Survey Checklist attributes shall provide clear identification of survey methods and verification activities evaluating the areas of interest, the extent of review and, if available, a source of or basis for the attribute. Develop attributes for program controls based on comparable criteria in

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ASME NQA-1. Provide for investigation of the activities performed by the supplier for providing a certification.

For example:

- **DO NOT STATE:** *“Evaluate the supplier’s design control process”*
- **DO STATE:** *“Select examples of design change documents for several of the following items: metallic fastener, pneumatic control assembly, housing seal, welded accumulator and coil.”*

For each design change document, verify:

- The configuration being changed is that of the originally qualified item in the Environmental Qualification engineer file, or a later approved revision.
- The content of the change is an adequate technical evaluation considering the need for changes that may affect seismic qualification.
- The updated configuration has been translated into internal specifications and acceptance documents.”

- 4.2.6** Factor into development of lines of inquiry previous experience with the supplier that indicate potential areas of weakness requiring further investigation, or strengths. Consider experience from source inspections, receipt inspections, etc.
- 4.2.7** It is good practice to incorporate into the checklist activities to evaluate the potential for supplier use of suspect/counterfeit items. Avoid generic suspect/counterfeit item issue statements; instead tailor the checklist items to the scope of work being procured.
- 4.2.8** The PEM reviews the background information included on the CG Survey Checklist for accuracy and thoroughness and to verify that it effectively addresses criteria established in the CGD plan. The PEM approves the CG Survey Checklist, including the Basis for Survey Team Lead Capability.
- 4.2.9** The Survey Team Lead prepares other survey participants for the survey by discussing the background information and the expected scope of the CGI and CGS. The Survey Team Lead reviews the assigned CG Survey Checklist attributes with each participants and expectations for performance of the CG Survey. The Survey Team Lead emphasizes the importance of rigorous investigation of the attributes to support the dedication activity.

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4.3 Supplier Evaluation

4.3.1 Performance of a Survey

Using the CG Survey Checklist, the survey team shall perform the following:

- Conduct an entrance meeting with the supplier personnel prior to performing the survey. The survey will be conducted by following the planned checklist attributes, recognizing flexibility in the investigation may be necessary as the survey progresses. A good practice is to observe personnel performing activities, or interview personnel, rather than simply reviewing documentation. Document objective evidence reviewed, results, interviews, and state the adequacy of the processes.
- Review the supplier procedures and program documents related to the scope of work.
- Document the program and procedure references with the associated attribute.
- Pursue areas where results are less than expected to obtain a clear understanding of the process weakness and extent of condition. Review sufficient examples to confirm conclusions. When judging the acceptability of a CGI or CGS, consider the critical characteristics of the item in its intended application. Complex CGI or CGS with more significant functions require more rigorous controls than simple items with less significant functions. Evaluations of Supplier commercial procedures and programs call for more flexible consideration of commercial controls than normally experienced with nuclear programs; however, the same activities are accomplished.
- The survey methods and objective evidence reviewed and the observations shall be documented on the CG Survey Checklist.
- Explain investigative techniques pursued for areas of concern. When planned checklist activities are modified or additional areas are covered, explain the basis.
- Contacts SME'S who are not participating in the survey but who can provide assistance for support in order to perform an effective survey or to clarify expectations.
- At the conclusion of the survey, provide a verbal summary of the results to the supplier representative. Provide reasonable explanation for conclusions but avoid prescriptive expectations for process changes. If necessary, provide information to adjust the method for commercial grade dedication considering the survey results. If any identified weaknesses or contract violations may affect CGI or CGS previously accepted, initiate appropriate corrective actions.

4.3.2 Use of Supplier Evaluation Information Performed by Others

After performing the planning activities above to understand the safety significance and critical processes for the scope of work, information on supplier program implementation performed by other organizations may be considered for all or partial evidence. The survey team reviews the information considering:

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- Credible objective evidence of program implementation
- Investigation of the critical processes and characteristics for the scope of work
- Appropriate level of rigor commensurate with the scope significance

Information from other organizations may be used to provide the evidence in lieu of a visit, but not the value judgments made by the other organization relative to the acceptability of the supplier's QA program. This information may be used for some or all aspects of the critical processes or characteristics.

The use of information from others is documented on the CG Survey Checklist in the same manner as if a survey is performed, along with an explanation as to the basis for use of the information, if necessary.

4.4 Survey Reporting

The team develops a summary of the Supplier's adequacy and effectiveness for implementing the program controls evaluated during the CG Survey. Consider the objective evidence observed to make a judgment on whether the Supplier can be relied upon to perform the activities effectively or whether compensatory actions are required. The summary needs to explain this judgment, and clearly explain areas of weakness in a manner that the information is readily understood by users of the results. The Survey Team Lead completes the CG Survey report and submits it to the PEM for approval.

4.4.1 The PEM reviews the content to ensure accuracy, thoroughness and explanation of weaknesses, and approves the CG survey.

4.4.2 The Survey Team Lead applies the results of the evaluation on open purchase orders (PO), if any, to determine whether there is an impact to the Supplier's performance or current PO technical or quality requirements. The Survey Team Lead updates the CGD Plan or PO to incorporate changes as necessary.

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ATTACHMENT A

BASIS FOR SURVEY PERSONNEL CAPABILITY		
COMPANY _____	LOCATION _____	DATES: _____
SURVEY TEAM LEAD _____		
COMMUNICATION SKILLS _____ _____ _____ _____ _____ _____		
TRAINING AND KNOWLEDGE _____ _____ _____ _____ _____ _____ _____		
WRITTEN EXAMINATION OR VERBAL INTERVIEW _____ _____ _____ _____ _____ _____ _____		
PROCUREMENT ENGINEERING MANAGER _____		DATE: _____

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ATTACHMENT B

COMMERCIAL GRADE SURVEY CHECKLIST

SUPPLIER: _____
ADDRESS: _____
TELEPHONE: _____
CONTACT: _____

SURVEY PLANNING

REFERENCES:
COMMERCIAL GRADE DEDICATION PLAN _____
SUPPLIER QA MANUAL / PROCEDURES: _____

CRITICAL CHARACTERISTICS/PROCESSES	BASIS FOR SELECTION

LINES OF INQUIRY

#	ATTRIBUTE/METHOD OF EVALUATION

SURVEY PLANNING PERFORMED BY: _____ DATE: _____
SURVEY PLANNING APPROVED BY: _____ DATE: _____

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SURVEY PERFORMANCE	
#	OBJECTIVE EVIDENCE/JUDGEMENT AND BASIS
PERSONNEL INTERVIEWED	
NAME	POSITION
SURVEY RESULTS SUMMARY:	
EVALUATION OF IMPACT ON OPEN PURCHASE ORDERS:	
SURVEY PERFORMANCE AND REPORTING APPROVAL:	
PREPARER: _____	DATE: _____
APPROVAL: _____	DATE: _____