

Parts ordered to Original Equipment Manufacturers (OEMs) part number

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Equipment purchased from the Original Equipment Manufacturer using the same part number but years apart in time need to be examined to ensure that the new components are the same from a form, fit and function standpoint.

Discussion of Activities:

A recent order of 4 spares using the OEMs part number resulted in a separate set of vendor drawings from those for the original set of 8 components. The components were treated as a subset of the original order, which led to missing minor differences in form and fit in the disposition of a nonconformance report (NCR).

Spares were ordered from the OEM using their part number. The original components came with a Nationally Recognized Testing Laboratory (NRTL) certification, which the manufacturer no longer routinely offers. The components were inspected and tested on-site using an NRTL subcontract. This inspection and testing identified two deficiencies, which were resolved in an NCR by rework and repair. When treated as a subset of the total of 12 components, the changes were incorporated by reference. This is not allowed if everything in an order is changed, and, in this case, 4 of 4 components were modified.

Analysis:

The components were ordered from the same manufacturer at different times. The components have the same function, but an examination of the vendor documentation revealed form and fit differences that make the components unique from each other. Treating the components as if they were identical puts the resolution of the NCR in question, and resulted in less than adequate review and documentation of the repair.

Actions or Recommendations:

A new Projects Issues Evaluation Report (PIER) was written to open a new NCR and disposition it appropriately to the facts that the equipment modified was 100% of a unique, but similar lot to those originally purchased, and the changes needed to be documented in a Design Change Package/Vendor Drawing Change Notice.

From: Chretien, Roland

Sent: Thursday, July 11, 2013 1:10 PM

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Cc: roland.chretien@urs.com

Subject: defective PPE - DuPont Tychem SL Coveralls

To All:

The purpose of this email is to communicate to other ES&H representatives and users of the product about the discovery of defective DuPont Tychem SL coveralls commonly known as "Saranex" to those in the field.

As of yesterday, one of our team members discovered a defect with three sets of coveralls (Tychem SL part no. SL122TWH3X000600) manufactured by DuPont that were purchased from a local vendor week ending July 5th 2013. The defect was similar with all three units. Each set of coveralls had inadequate stitching of the zipper to the garment itself; thereby, leaving an obvious "hole" near the zipper so an employee not noticing the defect may suffer a dermal exposure during use. Please know that the DuPont Tychem SL coverall has an exterior barrier flap that covers the zipper; therefore, the likelihood is minimal due to the barrier flap and the typical practice of taping over the barrier flap.

Our local vendor is currently working with DuPont with regards to this issue; however, LWMS project shall discontinue use of all Tychem SL coveralls packaged as LOT#EI49575413 (6 units per box) until further notice. Those coveralls that do not fall under LOT#EI49575413 shall be closely inspected as usual by users; but, in addition to the action of inspecting PPE prior to use, users shall be encouraged to pay particular attention to the zipper area.

If you have any further questions, do not hesitate to contact me directly.

Sincerely,

Roland S. Chretien III, CSP, OHST

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