

EFCOG Supply Chain Quality Task Team 2021 Fall Meeting Minutes

November 02-04, 2021
(Virtual)

Minutes

Unless OUO, please see individual presentations for additional information

Tuesday November 02, 2021

1. Bill Wingfield (LANL) - Welcome and introductions

2. Amber Romero (SNL) - Safety / Security share (Handling Supply Chain Alerts such as cyber hacks on suppliers.)

Sources of Alerts: Supplier Notifications, Internal/Employees, External

Priority: Remediate harm and understand what happened

- Consider not just immediate actions, but also must assess past impact and mitigate future impact
- Recommend creating a Work Instruction or similar checklist to help you take all the appropriate actions and consider past, present and future
- Cyber breaches: assess whether information was lost; supplier should demonstrate due diligence to understand what happened and prevent recurrence. If information was lost, coordinate with appropriate stakeholders to determine the damage; get assistance from cybersecurity partners
- Software Vulnerabilities: Apply patches, scan for other instances, prevent recurrence
- Prohibited Surveillance Equipment and Counterfeits: Sequester items and report as required; Conduct Extent of Condition analysis; block future purchases.

Q: how does Sandia communicate supplier issues? Risk assessment (e.g., export control/non-US labor) to spark discussions with subcontractors.

A: With regard to non US Labor, they purchase entire database and incorporate into dashboard to scan supplier matches and then incorporate that into subcontractor risk assessments.

Q: Do some suppliers refuse to do business with us? (e.g., Nuclear) (e.g., Japan companies not allowed to sell to anyone making weapons) supplier when identified as do not sell (for nuclear side).

A: No answer on how to mitigate (if supplier will not do business with the project).

Q: Has anyone run into issues with suppliers trying to meet new NIST8-53 (Security and Privacy Controls for Information Systems and Organizations)? <https://csrc.nist.gov/Projects/risk-management/sp800-53-controls/release-search#!/800-53>

A: Not flowed down in contracts yet. Crosswalk indicated ~80% overlap on AS9100 to NAP401.

3. Amber Romero (SNL) - Leveraging AS-9100 Suppliers Briefed group on task status (see slides)

- Demonstration of the OASIS System repository of certified AS-9100 suppliers.
- [www.iaqg.org \(https://iaqg.org/tools/oasis/\)](https://iaqg.org/tools/oasis/)
- International Aerospace Quality Group (IAQG) Online Aerospace Supplier Information Systems (OASIS)
- Unfortunately, cannot keyword search for scope (need to go into each individual supplier's details page). Audit results page provides more information (can get permission from supplier to access the audit report). Harvested list of suppliers and sent request of information (ROI) to ~2000 suppliers (<300 responses) with link to WordPress for consistent responses to review results (downloaded responses into excel to query/filter/sort).

WordPress worked great!

Q: Is the supplier information available on the MSL?

A: Yes

Q: Is it difficult to register to the site?

A: Very easy (takes <5 minutes)

4. Nicolas (Nic) D Lewis (LANL NSRC) – Los Alamos National Lab Brief History

- A Brief History of the Lab at Los Alamos (Slide Presentation)

5. **Gabby Holcomb (DOE_HQ) – Suspect/Counterfeit Items Annual Report**

- Suspect/Counterfeit Items Working Group (SCIWG) Activities & Metrics for S/CI and Defective Items
- Draft headmark list under review.
- Gabby I am always looking for articles to include in newsletter if you have any!
- Workshops April, May, June. (link to slides available on S/CI Powerpedia website [here](#)).
- Most reported items are Fasteners (next is Hoisting, Lifting, Rigging and Electrical). Provided examples (bolt missing Mfg marker, electrical breaker Amp discrepancy).
- Reporting: DOE O 210.2A (or OPEXShare) (see also FAR 52.246-26 whitepaper – link [here](#) in Powerpedia or can obtain by emailing gabrielle.holcomb@hq.doe.gov). Contact your local OPEX coordinator.
- 2021 = 3 lessons learned/best practice/OE occurrences (provided examples).
- 2021 = 234 Data Collection Sheets (DCS's), 2 of which were S/CI and 232 were defective items (provided list and accordance of DCS types and examples [N95 masks, counterfeit NIST manual purchased from authorized distributor]).
- 2020 = 7 GIDEP reports. Provided list of categories (e.g., nonconformance, S/CI) and types (e.g., electronics, medical, chemical, test equipment, book, electrical). Only 3 sites (KCNSC, LLNL, SNL) with GIDEP reports. No data from previous years to compare to.

6. **Felix Gonzales (DOE/A23) - Data Analytics and Machine Learning (DAMaL) Tools Demonstration**

- Presented Examples specific to Supply Chain Management and Suspect Counterfeit Items; artificial intelligence/natural language processing/similarity searches and analyses.
 - You can email Felix to obtain access/training as a DOE federal or contractor employee.
 - Rank = % similarity between search metadata and the report (via algorithm). 1.0% = exact same article. >0.1% is typically good similarity.
 - Can copy entire article (copy/paste as string text) into “Search Words”.
 - Can search different system (e.g., OPEXShare, ORPS)
 - User Guide available in the website
 - Demo: System, Process and Outcome (SPO) ORPS dashboard
- Q: Can you search on suppliers?
A: Only if supplier is mentioned in the record.
Q: Hardwired to ORPs (real time?)
A: No, updates are manually performed once a month or if requested (other sources [e.g., OPEXShare] have different update frequencies)

7. **Alicia Gallegos (NNSA) - R-013 Expectations**

- NNSA's planned approach to the new R-013 Supplier Requirements. (Was going to be NAP-24B, Attachment 6; Replaces NAP-401.1 requirements for suppliers.)
 - NAP24A: Contractor shall ensure this its subcontractors and sub-tier contractors have NAP24A requirements flowed down to the extent necessary
 - NAP 24B Attachment 6: Specified which requirements to flow down to all tier level of suppliers.
 - NAP 401.1A (June 2021) removed requirement to flow down all requirements to all subcontractor tiers (high-level procurement requirements).
 - R013: Control Supply Chain
 - New definition of Weapon Product.
 - Appendix A: Evaluate, Select, Monitor.
 - Appendix B: Level 1 (COTS), Level 2 (Commercial with slight modification), Level 3 (Specially Designed)
 - Discussions about using accredited suppliers and how differing vaccine mandates and state requirements may impact the ability to retain qualified suppliers.
- Q: What was the title of Appendix B:
A: No title yet (will be requirements to suppliers)
Q: Timeline of when R-013 will be issued
A: Not developed yet
Q: It looks like the R-013 document is considering taking advantage of ISO-9001 and AS-9001 certs. It should be noted that although AS-9100 assessments can be good, ISO-9001 assessments are not actually very good assessments.

8. **Alison Maurer (DOE-OIG) - Minimizing Introduction of Counterfeit Items in DOE Supply Chain**

- Discussed purpose, types of investigations and risks.

- Provided examples (Temperform false certification related to heat treating of Aluminum, Hunt Valve falsified CoC).
- Reporting: OIG hotline (800) 541-1625 or www.energy.gov/ig/ig-hotline

9. **Bill Wingfield (LANL) – Open Discussion – Potential Tasks**

- New Task? Due to recent NQA-1 determination (committee identified NQA-1 does not prohibit or address remote assessments), a task for DOE approach for using technologies and graded approach for remote audits may be warranted.
- Open Discussion: Regarding gap analysis (NQA-1 vs AS-9100): Minor gaps between AS-9100 does not go into level of detail for NQA-1 subparts, however, meets most main parts with limited exceptions (e.g., auditor certification)

Q: Can we close task SC-18-01 SCI Improvement since the actions in the task are being handled/tracked by S/CI program?

A: Yes. 11/2/21 Bill emailed Gabby to make sure the requested revisions to DOE O 414.1D and DOE O 232.2A are being tracked. When determined that that these requested changes are being tracked, this Task will be closed.

Wednesday November 03, 2021

1. **Bill Wingfield (LANL) – Welcome and introductions**

2. **Seneca Johnson (SRS) – Safety/Security Share (Food safety for the upcoming holidays)**

- From chat: FDA is currently short staff to inspect food and food born illnesses.

3. **Kristin Bell (SNL), Dave Hebert (KCNSC), David Hicks (KCSNC) – MSL Training and Items Considered for Future MSL Development**

- Presented MSL and provided demo. To register for access to the MSL go to: <https://thesource.energy.gov>. Then once approved access from then on go to: <https://www.msl.kcnsd.doe.gov>
- Large effort is reconciling data (lab names, etc.). If you have suppliers that need to be added to the database, they can add them for you (and that way they can also keep it clean).
- When the 3-year expiration is calculated, it should be in accordance with site specific policies. Some sites calculate it from the last date onsite, the date of audit or the date the corrective action is closed. If doing a 3rd party audit, the date of expiration should be no longer than 3 years from the date of boots on the ground (i.e. the actual on-site audit).
- Information contained in MSL is OUO (Entrust is an acceptable method of access Entrust, not Outlook Entrust). Can provide access to individuals, including site DOE contractors with a site email address (not suppliers as subcontractors) within established boundaries. PIV and OneID is preferred
- Supplier status (e.g., Active/Inactive) is not audit status. Some sites change this to expired when they are removing them from their list, but the supplier audit is still valid. The MSL team is planning to remove that status in two places (the supplier menu display and when creating a new supplier) to avoid confusion
- MSL Improvement Item - Adding the assessment start date to the assessment status box. (Assessment by Location listing)
- 'Third Party Assessment' should be selected in the Assessment Method field for all 3rd Party Reviews.
- When adding a new assessment, the option to add a Cost Avoidance does not appear until the assessment is saved.
- MSL Improvement Item (Expiration Notifications) - Emails will go to the assessment owners at 90, 60 & 30 days, then on day of expiration the assessment status will move to 'Expired'. Kristin Bell will monitor if two notices go out to see if there is another contact to notify. Some sites do not use hard expiration dates (i.e. LANL).
- MSL Improvement Item - Adding place to communicate other capabilities/commodities of the supplier that may not have been audited.
- MSL Improvement Item - Adding metadata fields for PSL required information (NNSA site requirement) for calibration suppliers.
- Cost avoidance form: Creating methodology to select total value of original cost and cost avoidance (i.e., easy button) for sites that have the same cost avoidance for audits. This will still require further discussion between the sites on the best approach to handle cost avoidance entries/amounts

Q: When adding assessment dates, will it be the audit date or subsequent 3rd party audit dates

A: Need to investigate. Discussion identified actual audit date is most important date.

Q: Why can PNNL see just site name in Supplier view, and nothing for that site in Site Viewer?

A: Discussion identified request to have all sites that participate in MSL be allowed to at least see if an audit has been done, but permissions are controlled by the standards used at each site. This restriction is compliant with the original requirements put in place for weapon vs non-weapon sites. First of all, I want you to know that I understand the desire being requested. I believe back in Spring of 2020 the project team deferred to a decision from a meeting of NEA. From this was born the use of Assessment Standards as a way to assure that the Weapons complex suppliers were not shared with non-weapons Sites (EM and OOS). We also agreed that any future change to the security of the MSL would apply governance by the NNSA Sites and the MSL Site Admins (BW and VG) requiring concurrence. The MSL is programmed that we can make exceptions for some Sites, allowing some additional Standards making those visible... However, the same concurrence is required. NTK

Q: Who is Assessment owner?

A: Discussion identified individual sites have different expectations. In general, should be the most applicable person time (audit program lead/manager, lead auditor, etc.) to contact for questions and audit documentation.

4. Jeffrey Winter (DOE HQ) – Supply Chain Happenings in NNSA - Task SC-21-02 – MSL talks to the site’s ASL & Task SC-21-03 – DOE MOA to use the MSL

- R013 Control Supply Chain
- T038 Procurement Definition (section 4 mentions exchanging supplier information)
- Drafted R013-256 to move T038 section 4 into R013 (R = required, T = not a requirement). R013-256 will require M&Os to share audit information. On agenda for 11/09/2021.

Discussion regarding sensitivities to sharing supplier performance information, including GIDEP.

5. Bill Wingfield (LANL) – Task SC-18-03 – DOE EM Single Approved Supplier List – Update the MSL POC list

- Bill went through the MSL POC list with those on the call and was able to make some updates. Those sites using the MSL are giving Status = 1. Status = 2 are those sites that are interested (i.e. ORNL). Status = 3 are those sites that are unsure; and Status = 4 are those sites that don’t want to use the MSL. All sites are encouraged to use the MSL.

6. Sandra Schindler (SNL) –

- Discuss various site’s Quality Level / Management Level determinations. If your site is willing to share please send your QLD procedure to Sandra as she is benchmarking.

7. Bill Wingfield (LANL) – Foreign Employees/Visitors at Suppliers Guidance – Discussion

- Reviewed and discussed JSEP Supplier Evaluation Governing Document Appendix J Export Control Checklist. Open discussion on how sites evaluated suppliers for export control.
- Have LOIs and use other tools (green cards, etc.) to evaluate potential non-US labor.
- Sometimes have to ask in different ways for the supplier to understand what it means.
- Other things to consider: Janitorial substitutions not vetted? Construction services? Maintenance services? Making scraps unrecognizable (destruction methods)?
- When asking questions about storage, transmission, and destruction of export controlled items, must consider all three: electronic information, hard copy information, and physical items/materials.

8. Ron Rodger (NNSA) - R-028- Release and Update Discussion

- NNSA’s planned approach to the new R-028 NNSA Metrology Program. (Replaces what would have been NAP-24B Attachment 5.)
- Potential release May/June 2022.
- Change from two sets of requirements to process flow (4.1 Establish, 4.2 Implement, 4.3 Assess/Correct) and Appendices (A-I)
- Applicable to weapons (NAP 24) and general operations (DOE 414.1D umbrella; however, 414.1D does not address DCS/CCL/CTL)

Q: Does the Section on DCS/CCL/CTL qualification require ISO/IEC 17025 consistency as part of their qualification?

A: Will not see anything referring to ISO/IEC 17025; however, may see requirements similar to ISO/IEC 17025.

ISO/IEC 17025 accreditation does not always cover all requirements (need gap/graded review for ISO/IEC 17025 suppliers).

Q: Does section on DCS/CCL/CTL clearly outline the requirements for their audit and qualification?

A: Believe so

Q: Is the new R-028 document only applicable to Weapons Suppliers.

A: No, as it is also applicable to suppliers required to meet DOE-O 401.1D

Q: DOE O 414.1D does not have near the specificity requirements that Chapter 13.2 or the PSLM has. Sounds like we are requiring a lot more to the Institutional (NQA-1) suppliers than was previously required. It was suggested that this discussion be taken off line.

9. Amy Lientz (INL) – Supply Chain Risk Management (SCRM) Practices

- Benchmarking results of implementing SCRM across the DOE Complex.
- Sent supply chain risk survey (13 questions with multiple parts). Reviewed questions/responses and actions taken.
- Information is available on the EFCOG site.

10. Julie Snelling (PNNL) – Open Discussion Potential Tasks

- New Task (from Day 1) Due to recent NQA-1 determination (committee identified NQA-1 does not prohibit or address remote assessments), a task for DOE approach for using technologies and graded approach for remote audits may be warranted. The two (2) NQA-1 Interpretations have been sent by Bill to Christine for loading onto the EFCOG web-site.

Thursday November 04, 2020

1. Bill Wingfield (LANL) – Welcome and introductions

11. Michael Houston (ORNL) – Safety/Security Share (Gun Safety (ORNL Safety Toolbox #381))

- Hollywood fatal shooting (Red flags and safety culture)
 - Low budget and strict deadlines
 - Combined prop master and armorer (1 salary for two positions)
 - Armorer not experienced
 - Indication signs (history of accidental discharges, crew protesting before incident)
- Also discussed general gun safety.
- Mentioned PNNL has a recent loss of colleague (2 weekends ago) due to heart attack when caring hunting prize out. Pay attention to your body when hunting and extraneous activities.

2. Julie Snelling (PNNL) – Supplier Audit Schedules

- Reviewed and updated the supplier audit schedule through June 2022.
- Be sure to go to niac-usa.org when looking for NIAC.

New Action Items	Person Responsible	Due Date
✓ New Task? <ul style="list-style-type: none">• (From Fulghum - Day 1): Due to recent NQA-1 determination (committee identified NQA-1 does not prohibit or address remote assessments), a task for DOE approach for using technologies and graded approach for remote audits may be warranted.	Bill Wingfield	Next monthly meeting
✓ Close task SC-18-01? (When it is determined that the actions in the task are being handled/tracked by S/CI program)	Bill Wingfield	Next monthly meeting
