

## LBL S/CI Policy



### Procurement

- Items known to have been suspect or counterfeit in the past should be procured from qualified or dedicated suppliers.
  - e.g. High-strength fasteners (e.g. graded bolts, screws, nuts and washers) must be:
    - purchased directly through the Procurement Department
    - segregated and secured from general stock
- Procure items using formal procurement mechanisms versus informal mechanisms:
  - Identify and document clear technical, quality, safety and business requirements/ specifications
  - Identify and document required supplier quality documentation (i.e. manufacturer's Certificates of Conformance (CoCs), test plans or reports, manufacturer's travelers, training certificates, etc.)
  - Hold supplier accountable to contractual requirements

## LBL S/CI Policy



### Identification

- Perform inspections of facilities and equipment (e.g. self-assessments, inspections, testing, maintenance) to identify S/CIs
  - Perform inspections upon receipt of item
  - Perform pre-operational inspections prior to use of system or item
  - Base inspection criteria on technical, quality, safety and business requirements/ specifications documented in procurement documentation
- Contact the Office of Contractor Assurance (OCA) if an item is suspected of being an S/CI
  - OCA will work with appropriate organizations to:
    - Determine if item is an S/CI
    - Coordinate engineering evaluations, verification testing and disposition of items, as appropriate

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### Disposition & Reporting

- If S/CIs are found in safety systems or critical applications that can adversely impact the environment or create a safety hazard:
  - Lock out or tag out the system, item or application
  - Replace the S/CIs
- If S/CIs can be used-as-is, provide a documented justification for continued use to OCA
  - Justification is documented by an engineer or technical expert
- Report S/CIs to the ORPS Coordinator for input into the ORPS database
- Enter S/CIs and corrective actions into the CATS database

## LBNL S/CI Policy – Resources



- Quality Assurance Policy (No. 04.03.001.000)
- LBNL *Quality Assurance Program Description* (LBNL/PUB-3111)
  - Attachment C specifies Quality Clauses
- OCA Quality Assurance Webpage
  - <https://commons.lbl.gov/display/oiawebfiles/Quality+Assurance>
- Melanie Gravois, Assurance and Quality Program Manager