

<b>Subject:</b>  <b>Identifying and Dispositioning Suspect Parts</b>	<b>Effective Date:</b>  <b>August 4, 2000</b>	<b>Initiated by:</b>  Head, Quality Assurance
	<b>Supersedes:</b> NEW	<b>Approved:</b>  Director

**Introduction**

All PPPL personnel must be watchful for Suspect/Counterfeit Items in the workplace. This procedure establishes the practices to ensure that Suspect/Counterfeit Items are identified and dispositioned to remove them from applications that compromise safety and to prevent their reuse.

Although counterfeit bolts are the most well known counterfeit/suspect item, the term applies to any items deliberately misrepresented by the supplier. Used or refurbished electrical components, flanges or fittings, struts, and other hardware have been supplied as new and so are also considered suspect/counterfeit items.

**Reference Documents**

- P-041            Suspect Parts
- QA-005        Control of Nonconformances

**Definitions**

- Suspect Items            A part or item whose documentation, appearance, performance, material, or other characteristics may have been knowingly misrepresented by the vendor, supplier, distributor, or other manufacturer. (Further investigation is required to determine if suspect items are, in fact, counterfeit).
- Counterfeit Parts        A part or item whose documentation, appearance, performance, material, or other characteristics are knowingly misrepresented by the vendor, supplier, distributor, or manufacturer.

**Procedure**

**Responsibility**

**Action**

- |                      |  |
|----------------------|--|
| Cognizant Individual | <ol style="list-style-type: none"> <li>1. Identifies Suspect/Counterfeit Items. Bolts listed on the DOE Headmark List (attached) are presumed to be counterfeit.<br/><i>For Suspect/Counterfeit Items identification information contact QA or access the QA web page</i><br/><a href="http://www-local.pppl.gov/qa/">http://www-local.pppl.gov/qa/</a></li> <li>2. Removes equipment from service (unless adverse conditions would result) and contacts QA (ext. 2203) or ESU (ext. 3166).</li> </ol> |
| ESU                  | <ol style="list-style-type: none"> <li>3. Notifies PPPL Facility Manager of a possible occurrence per GEN-006. Notifies Quality Assurance (extension 2203) if not already informed.</li> </ol>   |

QA

4. Issues a Nonconformance Report, per procedure QA-005, to document the discovery and the final disposition of the Suspect/Counterfeit Items. Notifies ESU (extension 3166) if not already informed.

Cognizant Individual

5. Determines whether Suspect/Counterfeit Items will be removed and replaced (“REPAIR” on the NCR) or marked and left in place (“USE-AS-IS” on the NCR). An engineering evaluation is required for decisions to leave Suspect/Counterfeit Items in:

applications with potential safety impact or  
the critical load path of lift equipment.

For lift equipment, consult a Lift Engineer or service contractor’s mechanic to identify the critical load path. Suspect/Counterfeit Items left in place must be clearly and permanently marked (typically with permanent, red paint the method used should be documented on the NCR) to prevent future use in more critical applications.

*The disposition must be documented on or as an attachment to the NCR. Engineering evaluations should have the engineer’s signature. However, the disposition process need not be delayed while the NCR is being written or otherwise processed. For example, a Suspect/Counterfeit Items bolt in the load path can be removed and replaced on the spot, minimizing time that the equipment is out-of-service. Similarly, when there is no doubt that Suspect/Counterfeit Items bolts are not in the load path, they can be marked and the equipment returned to service while the paperwork is being processed.*

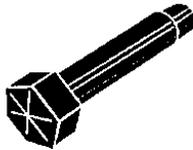
6. Delivers all removed Suspect/Counterfeit Items to QA for ultimate disposal.

**Attachment**

1 DOE Headmark List

## DOE Headmark List

ANY BOLT ON THIS LIST SHOULD BE TREATED AS DEFECTIVE WITHOUT FURTHER TESTING.



ALL GRADE 5 AND GRADE 8 FASTENERS OF FOREIGN ORIGIN WHICH DO NOT BEAR ANY MANUFACTURERS' HEADMARKS:



GRADE 5



GRADE 8

GRADE 5 FASTENERS WITH THE FOLLOWING MANUFACTURERS' HEADMARKS:

MARK	MANUFACTURER	MARK	MANUFACTURER
 J	Jinn Her (TW)	 KS	Kosaka Kogyo (JP)

GRADE 8 FASTENERS WITH THE FOLLOWING MANUFACTURERS' HEADMARKS:

MARK	MANUFACTURER	MARK	MANUFACTURER
 A	Asahi Mfg (JP)	 KS	Kosaka Kogyo (JP)
 NF	Nippon Fasteners (JP)	 RT	Takai Ltd (JP)
 H	Hinomoto Metal (JP)	 FM	Fastener Co of Japan (JP)
 M	Minamida Sleybo (JP)	 KY	Kyoel Mfg (JP)
 MS	Minato Kogyo (JP)	 J	Jinn Her (TW)
 Hollow Triangle	Infasca (CA TW JP YU) (Greater than 1/2 inch dia.)		
 E	Dalai (JP)	 UNV	Unytite (JP)

GRADE 8.2 FASTENERS WITH THE FOLLOWING HEADMARKS:

MARK	MANUFACTURER
 KS	Kosaka Kogyo (JP)

GRADE A325 FASTENERS (BENNETT DENVER TARGET ONLY) WITH THE FOLLOWING HEADMARKS:

MARK	MANUFACTURER
Type 1  A325 KS	Kosaka Kogyo (JP)
Type 2  A325 KS	
Type 3  A325 KS	

Key: CA-Canada, JP-Japan, TW-Taiwan, YU-Yugoslavia