

# TEMPORARY CHANGE REQUEST

TCR NO. TCR-P041 R5-001

The Temporary Change Request (TCR) Form is to be used to process urgent or minor changes for PPPL Policies, Organization/Mission Statements and Procedures. The TCR should be used when changes are:  
1) urgent, and can not wait the 2-4 week period for Department Head review/comment, or  
2) minor, and do not warrant Department Head review.

Person Requesting Change: F. Malinowski Phone Ext: 2203

Department Name: Quality Assurance

Document Number: P-041 Revision No.: 5

Document Title: Suspect Parts

**Reason for change:**

To correct URL for Procurement web page.

**Change description:** (Summarize and attach changed pages, with changes clearly indicated)

URL on page 2 replaced

1. Does this TCR significantly alter the intent or scope of the document? YES:        NO: X  
2. Does this TCR significantly impact **ES&H**? YES:        NO: X

If 1 or 2 is **YES**, Explain why the changes should not be routed for Department Head review:

J. Malsbury  
Department/Division Head Approval

1/17/13  
Date

J. DeLooper  
Head, Best Practices and Outreach/designee

1/17/13  
Date

Release/Effective date of this TCR: 1/18/13

Incorporate this TCR into next revision of this document? YES: X NO:

<b>PPPL</b>	<b>PRINCETON PLASMA PHYSICS LABORATORY</b>	<b>POLICY</b>	<b>No. P-041, Rev 5 Page 1 of 2</b>
<b>Subject:</b>  <b>SUSPECT PARTS</b>	<b>Effective Date:</b>  <b>September 27, 2010</b>	<b>Initiated by:</b>  Head , Quality Assurance	
	<b>Supersedes:</b>  Rev. 4, Dated 1/11/08	<b>Approved:</b>  Director	

Princeton Plasma Physics Laboratory (PPPL), in keeping with its policy of ensuring personnel and public safety, environmental integrity, and consistent with its policy of protecting investments that affect the Laboratory's mission, makes every reasonable effort (graded approach, risk based philosophy) to prevent the use of suspect parts. PPPL's Suspect and Counterfeit Items (S/CI) Committee provides a multi-function team for ongoing program improvement and as a resource to evaluate suspect items. Each employee and subcontractor must be vigilant to detect and report suspect items. Hosts are responsible for assuring that collaborators do not bring S/CI onto the PPPL site, either directly or as part of assemblies.

To maintain awareness of suspect parts concerns, PPPL provides awareness training, maintains reference resources on the web, and issues alerts of recent incidents. Personnel specifying, ordering, receiving, inspecting, or installing hardware or electrical items that are susceptible to counterfeiting, shall have Suspect/Counterfeit Items Awareness Training. The individual line managers determine which of their employees are required to have the training by including it on the employee's training matrix. This training is mandatory for the following personnel:

- QA/QC Staff (QA Division)
- Buyers & Subcontract Administrators (Procurement Division)
- Receiving Personnel (Materiel and Environmental Services)
- System Engineers and Maintenance Technicians (Maintenance and Operations)
- Personnel directly involved in installations (Engineering and Technical Infrastructure /Experiment/Plasma Science & Technology)
- Personnel involved in ordering or receiving hardware, including electrical items (Engineering and Technical Infrastructure /Experiment/ Plasma Science & Technology)

To safeguard against the receipt and utilization of suspect parts, PPPL starts with the procurement of new items. Procurement includes information on suspect parts with each purchase order and subcontract to ensure subcontractor awareness. The Cognizant Individual can, by placing detailed controls and requirements within specifications and procurement documents, reduce the likelihood of receiving suspect parts. Available procurement controls include, but are not limited to:

- Imposing Witness or Hold points, as indicated by the Cognizant Individual, on the manufacturer. Witness points require that PPPL be notified and allowed access to observe specific operations. Hold points require approval by PPPL before the work can proceed.
- Specifying inspections and tests to be witnessed by or performed by PPPL.

- Requiring a pre-award survey via vendor surveillance or audits prior to award of contract.

Items deemed susceptible to counterfeiting have had procurement restrictions placed on them.

These items and the restrictions are available at:

<http://procurement-int.pppl.gov/Notices/Procurement%20Restrictions%20for%20Suspect-Counterfeit%20Items.pdf>  
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Suspect part identification information is available on QA's web page available through the PPPL Employee Services page or directly at: [www-local.pppl.gov/qa/](http://www-local.pppl.gov/qa/). All personnel are responsible for reporting any suspect items identified to QA or ESU (see lab procedure QA-020, Identifying and Dispositioning Suspect Parts).

Quality Assurance shall assist the Laboratory efforts by:

- Providing assistance to the Cognizant Individual when specifying appropriate controls for procurements.
- Performing surveillances and audits, assisting with inspections, and witnessing services.
- Documenting suspect items identified at PPPL.
- Publicizing information regarding counterfeit or substandard parts and equipment to maintain awareness of suspect parts as an ongoing problem, alerting Procurement to vendors identified as suppliers of suspect equipment, and improving the recognition of known problem items by Laboratory personnel.

The Department of Energy (DOE) has identified suspect parts as a problem at its facilities. All known instances of counterfeiting markings or falsifying goods or services delivered to PPPL must be reported to the DOE Occurrence Reporting System. Subcontractors and suppliers with repeated violations may be subject to debarment.

## **DEFINITIONS**

### **Suspect parts**

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.