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OCTOBER 12, 1988

TO: DISTRIBUTION
FROM: G. W. ROBERTS - CHAIRMAN, COMMITTEE FOR RESEARCH AND DEVELOPMENT
SUBJECT: ASQC R&D COMMITTEE MEETING DATE, TIME AND AGENDA

The next committee meeting is scheduled for Sunday, October 23, 1988 from 2:00 - 5:00 p.m. in the La Princesa room of the Hilton Palacio Del Rio in San Antonio, in conjunction with the 15th Annual Energy Division Conference.

The agenda for the meeting is to review the attached copy of Draft 2 of the ASQC Quality Assurance Guidelines for Research & Development document. Draft 1 of this document was reviewed from three different perspectives:

Perspective 1 - provided by R. Geoffrion

A small bench-top researcher with an extremely small budget needing guidance on developing a QA program for a project.

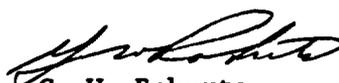
Perspective 2 - provided by D. Burrows

A small R&D lab that may not even have a quality department.

Perspective 3 - provided by D. Arter

A large, non-regulated, commercial firm performing contract R&D tasks.

Specific comments are printed opposite the page to which they apply and in many cases opposite the exact paragraph. General comments have been attached separately. The text of Draft 1 has been left unchanged so that the comments can be appropriately evaluated. The changes making this document Draft 2 include a revision to the title to include "Research and Development," the addition of an editorial credits/committee membership page, and the addition of a Scope.


G. W. Roberts

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Attach.

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GENERAL COMMENTS

The document is still fairly confusing for an independent researcher that knows very little about QA. We have incorporated QA guidance for large research projects in the same document with guidance for small research projects. In some cases it is very difficult to make the distinction. I feel that the introduction could have more detail explaining to the researcher that he can pick and choose the level of QA activity that makes sense for the funding and/or complexity of his task. (R. Geoffrion)

As I stated at the meeting in Dallas, I believe this draft is a significant improvement over the version I saw last Fall. It is still biased to the fabrication activities being practiced at B&W, but I notice much the flavor presented by Delvin in his earlier work. (Wayne doesn't agree with me on the latter comment - he still believes it is too development specific.) My major comments (suggestions for improvement, if you prefer) have to do with 1) the lack of discussion on Peer Review programs, and 2) the lack of specificity on Software Controls. (D. Arter)

The following are general comments received from the ASQC Technical Media Committee.

1. The text is well written and adequately addresses an area that requires deviation from the norm of general quality assurance programs.

With some additions pertaining to quality assurance guidelines on the operations of the R&D facility to produce quality products this will be an excellent book for quality Press.

2. More should be added on data collection, data reducing, control of samples, peer reviews.
3. This follows very well the principles of quality assurance described in various standards.

The subject matter will be of great interest to quality professionals in research organizations.

4. This book is definitely one that should be published by ASQC. It addresses an important area of application for quality assurance. In addition, it is being prepared by an ASQC division.
5. The document states that the intent is to provide guidelines for the application of quality assurance practices to R&D activities. There is a great deal that

has not been included in the treatment of this topic in the manuscript. The document really treats only laboratory experimentation. No mention is made of applications to theoretical research, to development design, to prototype construction, or to design alternative evaluation. Perhaps it is more important that R&D quality is never defined in the manuscript nor are measures of R&D quality defined. These are two major omissions which should be addressed if the book is to be marketable. In addition, there are very many techniques that have been applied to service quality assurance and to quality assurance programs in general. It would be wise to enumerate several of these methods and to provide references to the materials in which the specific steps to be used are described. This would avoid a significant duplication of effort.

6. The content is largely correct but actually includes very little technical content. There are some errors the most significant of which is the statement that statistical sampling should be used to characterize project conformance to laboratory guidelines. At the very least, an intricate stratified sampling methodology is required to obtain the inferences intended. Proper definition of a sampling strategy should include identification and characterization of the populations from which samples are to be taken and the type of statistics that may be applied. This is another area where it may be best to construct a list of useful references rather than try to define methods that will apply to every situation.
7. The market for the book includes managers and scientists working on R&D projects. In addition, quality assurance personnel working in R&D organizations may find the book worthwhile.

ASQC R&D COMMITTEE

ASQC QUALITY ASSURANCE GUIDELINES
FOR RESEARCH AND DEVELOPMENT

DRAFT 2

10/10/88

Specific Comments to the ASQC Quality Assurance Guidelines for R&D
Draft 2 dated 10/10/88

Added Committee membership and Editorial Subgroup
participation credits.

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Guidelines Document Project Editor

- R. K. Gill, Babcock & Wilcox, Research & Development Division

Specific Comments to the ASQC Quality Assurance Guidelines for R&D
Draft 2 dated 10/10/88

Added statement of scope. The scope is made up of the first two sentences from the Draft 1 Introduction. The scope states that the document is specific to energy related research and development.

SCOPE

This Guidelines Manual is intended to provide guidance in the application of Quality Assurance practices to energy related research and development activities. It is intended for use by researchers and research management.

Introduction

Second Paragraph, first sentence, delete "all" and add "should" so that it reads: "Researchers in scientific disciplines should have inherited "good laboratory practices" from the scientist and researchers that have gone before them." (R. Geoffrion)

Third paragraph, third sentence, change "Mistakes" to "Failures" so that it reads: "Failures, not tolerated in the manufacturing environment, are commonplace." (R. Geoffrion)

Third paragraph, fifth sentence, add "These" so that it reads: "These failures may occur until the correct solution is arrived at." (R. Geoffrion)

Third paragraph, After sixth sentence, Insert last paragraph of the introduction here so that it reads: "It would appear then,...concept of trial and error. The end product of most research efforts is data. In a...." (D. Arter)

Third paragraph, seventh sentence, change "engineering" to "laboratory" so that it reads: "Actually, a comparison of quality assurance procedures to good laboratory practices show..." (R. Geoffrion, D. Burrows and D. Arter)

Fourth paragraph, last sentence, delete entirely.
(R. Geoffrion)

INTRODUCTION

Research projects vary from those that take months or years and many millions of dollars to complete to those that take just a few days or hours and are relatively inexpensive. Not all the guidelines described here will apply to all projects. The researcher should pick and choose the use of the guidelines given in this document as they apply to a particular project.

Researchers in all scientific disciplines have inherited "good laboratory practices" from the scientist and researchers that have gone before them. These good laboratory practices resulted from the lessons learned in the quest for valid, accurate, reproducible data. The practices provide control over the various sources of loss and failure that can occur at any time in any experiment. Good laboratory practices are used by the researcher to help assure that all research activities are properly planned and executed resulting in reliable data which is necessary to support patentable processes, material, systems or hardware.

A research environment is quite distinctive. Researchers tend to be highly educated and highly self motivated people. Creativity and individuality are not only encouraged but are requirements of the job. Mistakes, not tolerated in the manufacturing environment, are commonplace. Research is trial and error. Failures may occur until the correct solution is arrived at. It would appear then, that quality assurance practices that are aimed toward doing things right the first time so as to preclude failures would be incongruous with the concept of trial and error. Actually, a comparison of quality assurance procedures to good engineering practices shows that the two are not mutually exclusive and that researchers have in reality been using some quality assurance procedures all along.

As a necessary foundation for any Quality Program there must be solid support from management. With the proper culture, employees know that management truly and enthusiastically believes in the Quality Program. This belief is demonstrated when management helps to set the goals of the quality program, authorizes and gives full support to quality improvement projects, and then periodically evaluates adherence to and effectiveness of the quality program. When upper management shows this much concern and commitment, others in the organization will realize that quality is of great importance.

Introduction

Fifth paragraph, second sentence, change "a large percentage of" to "many" so that it reads: "In many cases, this data becomes design..." (D. Arter)

Fifth paragraph, second sentence, move the second sentence to before the forth sentence so that it reads: "...reproduced successfully by others. In many cases, this data becomes design inputs and its accuracy is critical to design and other processes. The guidelines contained in the following sections..." (D. Arter)

Fifth paragraph, second sentence, the word "accuracy,"
Comment: More than just accuracy. (D. Arter)

The end product of most research efforts is data. In a large percentage of cases, this data becomes design inputs and its accuracy is critical to design and other processes. The goal of the quality program should be to ensure that the work performed achieves the intended objectives of the research project and that the work can be understood and if necessary, reproduced successfully by others. The guidelines contained in the following sections of this manual should help to ensure the integrity, adequacy, accuracy, precision, reproducibility, and retrievability of the data.

Responsibility

First sentence, delete "individual" so that it reads: "The responsibility of ensuring...should be placed upon the project leader." (R. Geoffrion)

Third sentence, delete "individual" so that it reads: "The project leader is best able to decide which technical..." (R. Geoffrion)

Fifth sentence, change "may" to "should" so that it reads: "The project leader should call on the quality department to help him/her make these decisions." (R. Geoffrion)

Fifth sentence, states: "The project leader may call on the quality department..." Comment: The suggestion to call upon the quality department for assistance implies that such a group exists. This section should be revised to discuss assignment of an independent QA oversight organization (or individual); that group (or individual) would then be called on to provide guidance for project QA programs. The discussion should include typical responsibilities for the QA group. (D. Burrows)

Sixth sentence, add "procedures are in place to accommodate," delete "are performed" and add "that" and "is" so that it reads: "It should also be the responsibility of the project leader to ensure that all procedures are in place to accommodate special customer requirements, such as material certifications, inspections, special tests or instrumentation calibrations and that appropriate documentation is on file." (R. Geoffrion)

Last sentence, delete entirely (R. Geoffrion)

Project Planning

First paragraph, first sentence, delete "completion" so that it reads: "It has been shown that the success of a research project is directly proportional to the quality of the front end planning." (D. Burrows)

Second paragraph, first sentence, delete "detailed" so that it reads: "A planning document should be developed to describe and control the project." (R. Geoffrion)

Second paragraph, fourth sentence, delete "and probability of success, parameters to be investigated" and "acceptable measurement uncertainty" so that it reads: "When writing the plan, the project leader should consider defining...limitations of approach, verification processes to be utilized, test apparatus required, whether formal inspections are required, whether customer approval of..."

Comment: In R&D sometimes, in fact quite often, these items (items deleted in the above sentence) are not known until well into the experiment. (R. Geoffrion)

Second paragraph, fourth sentence, states "When writing the plan..." Question: Should statistical design of experiment be added to this sentence? (D. Burrows)

I. Responsibility

The responsibility of ensuring that proper quality controls and checking activities are carried out should be placed upon the individual project leader. A project leader is the person responsible for the planning, tracking and reporting on a project. The individual project leader is best able to decide which technical elements of the project affect the quality or validity of the resulting data. Based on these decisions the project leader should then determine what elements of the QA program are applicable to the project. The project leader may call on the quality department to help him/her make these decisions. It should also be the responsibility of the project leader to ensure that all special customer requirements, such as material certifications, inspections, special tests or instrument calibrations are performed and appropriate documentation on file. Further, it should be the responsibility of the project leader to identify appropriate resources, technical and managerial, that are needed to meet the customer's requirements. It is suggested that the project leader provide an organizational chart and/or a list of responsibilities so that each project member is aware of his/her responsibilities. And finally the project leader is accountable to their management for the successful completion of the project.

II. Project Planning

It has been shown that the successful completion of a research project is directly proportional to the quality of front end planning which is performed. The project leader should in all cases discuss with the customer and come to an agreement on the workscope and milestones of the proposed project.

A detailed planning document should be developed to describe and control the project. The plan can be a separate stand alone document, a contract statement of work, a research proposal or some other project authorization document as long as it meets certain criteria. An adequate plan is detailed enough that a technically competent person can understand and perform the required work without recourse to project personnel for clarification. When writing the plan, the project leader should consider defining project goals and objectives, the design of experiment and the analysis required, test planning, pre-test reviews, limitations of the approach and probability of success, parameters to be investigated, verification processes to be utilized, test apparatus required, acceptable measurement uncertainty, whether formal inspections are required, whether customer approval of material substitutions is required, data evaluation methods required, reports required and any other deliverables. Preparation and submission of this work plan to

Project Planning

Forth paragraph, second sentence, delete "safety rules" and "government" so that it reads: "The project leader is responsible for assuring ...according to applicable approved procedures and safety standards." (R. Geoffrion)

Statistical Design of Experiment

Comment: This section addresses more than just statistical design; it is recommended that the title of the section be changed to simply "Design of Experiment" (D. Burrows)

Second paragraph, comment: This information is in the planning document. (R. Geoffrion)

the customer should be the first milestone of the project. The purpose of submitting the plan to the customer is to provide the customer with the details of the project as understood by the project leader. If the customer disagrees with any item of the test plan this allows him ample opportunity to clarify the work required. Copies of the plan should be provided to project team members as appropriate.

Planning should include facilities requirements and availability. Such items as buildings, utilities, space and temporary project labor may be needed to fulfill project requirements. The project leader should inform support personnel of the project's requirements at the outset of project planning in order to avoid costly delays later.

Included in this planning should be safety considerations of the project. The project leader is responsible for assuring that all work activities of the project are performed according to applicable safety rules, approved procedures, and government safety standards. The project leader should know the hazards and the approved procedures related to the work which will be performed.

The project leader should be aware of such safety concerns as personal protective equipment, hazardous chemical use, storage and disposal, and radiation hazards. Safety concerns should be discussed with the Laboratory's Safety Officer at the outset of project planning to avoid hazardous or life threatening situations later in the project.

III. Statistical Design of Experiment

Statistically designed experiments are recommended both for projects investigating parameters and their interactive effects, and for experiments seeking optimum conditions. Design of experiment techniques should also be used when the outcome of an experiment is to be defined by an equation.

The documented design should include a statement of the test objectives and a design matrix. The statement of the test objectives may be in the form of questions to be answered, the hypotheses to be tested, or the parameter effects to be estimated. The design matrix should consist of the parameter combinations to be tested to meet the test objectives.

Project Control

Comment: Change title of section to "Project Control for Development Activities." The section is OK for development, but not for research. (D. Arter)

Comment: Make a new section V titled "Peer Review." Add another subsection titled "Peer Review Board." (D. Arter)

Comment: Several forms of the Peer Review are being practiced by the research community, and they rarely resemble the Design Review methods used by the engineers. I know, for example, that there can be small and informal peer reviews, using reviewers from either the laboratory or from other labs, and there can be very large and formal reviews conducted at specific project milestones, with minutes and formal comment sheets and the whole nine yards. The document needs a separate section on Peer Reviews, with discussion on informal reviews, use of external reviewers, and the existing portion on Independent Technical Reviews (a form of the Peer Review in my opinion). A good source of information on Peer Reviews might be Clarence Williams of Battelle Labs. (D. Arter)

Comment: The differences between design reviews and independent technical reviews are not clear. (D. Burrows)

Design Reviews

Third paragraph, Question: When are reviews performed, before construction or before delivery? (D. Burrows)

Fifth paragraph, first sentence, delete "hopefully" so that it reads: "Recommendations, based on a consensus of the review participants...." (R. Geoffrion)

IV. Project Control

Design Reviews

The purpose of a design review program is to assure high quality, reliable, cost effective products or processes being developed or remodeled by the Laboratory. Design reviews can also be extended to new or redesigned experimental facilities within the Laboratory. Need for a design review may be dictated by the customer. In those cases where the customer has no requirement the need should be considered on a case-by-case basis by the appropriate manager. Design reviews dealing with experimental facilities may not need to meet all the suggested requirements which follow and should be conducted at a level appropriate to meet the requirements of the particular situation.

It is recommended that at least two reviews be performed. The first should be during the initial stages of planning to concur with design specifications.

Additional reviews should be performed after the design has been finalized and before transfer of the product or process to the customer or construction of the facility takes place. These reviews should be performed in formal documented meetings having formal agendas. Agendas should encompass such considerations as design objectives, design alternates (including associated costs) and comments from special government or industry review committees.

All reviews should be performed by technically experienced and skilled personnel from within the laboratory. Selection of these participants should be the responsibility of the appropriate manager.

Recommendations, hopefully based on a consensus of the review participants, should be documented in formal design review reports. All participants should sign this document denoting understanding of the recommendations. Opinions of participants disagreeing with the recommendations should be attached to the report.

Drawing Control

Engineering drawings are defined as representations of mechanical or electrical equipment, test facilities, etc. that are produced on drawing media with formatted borders and title blocks. Sketches are defined as representations of equipment, test facilities, etc. that are used to communicate temporary, preliminary, or intermediate engineering information pertaining to a project. Sketches are usually not to scale. Formal engineering drawings are recommended for:

Independent Technical Review

First paragraph, first sentence, add "that is critical to the project" so that it reads: "Independent technical reviews should be performed on projects which involve the taking and/or analyzing of data that is critical to the project."
(R. Geoffrion)

First paragraph, last sentence, states "The project leader may select the reviewer...and of funding limitations."
Comment: the last sentence should also mention schedule limitations. (D. Burrows)

Second paragraph, first sentence, delete "complicated" and add "designated" so that it reads: "Prior to the fabrication of a test article or the set-up of a designated test structure..." (R. Geoffrion)

- a. Documentation or long-term retention of design and/or construction of test articles necessary for reproduction of the experiment.
- b. All applications such as construction of equipment, test facilities, etc. requiring any type of Code conformance.
- c. Design or construction of equipment, test facilities including buildings, utility systems (i.e. air, water, steam, gases, electrical, etc.), or other reasonable permanent installations, or that require documentation for insurance purposes.
- d. Documentation of electrical circuits for construction or modifications to (reasonably) permanent equipment or test facilities.

All drawings should be checked by an individual other than the drafter and approved by the project leader prior to release for use. Revisions to drawings should be reviewed and approved in the same manner as the original.

Independent Technical Review

Independent technical reviews should be performed on projects which involve the taking and/or analyzing of data. The reviews should be performed by a person or persons knowledgeable in the subject of the research, but who had no responsibility in the project being reviewed. Management should establish and pass on to laboratory personnel the general qualifications for independent reviewers. The project leader may select the reviewer or reviewers and inform them of the purpose of the project and of the funding limitations.

Prior to the fabrication of a test article or the set-up of a complicated test structure, critical characteristics specified in the detailed work plan or by the project leader should undergo an independent review. These characteristics may include calculations for scaling, test performance, dimensional stability and Code and design interfaces.

During the course of the project or during the final review at the completion of the project, the following questions concerning the project should be considered by the reviewer commensurate with their effect on the quality or the validity of the data:

- a. Project performance with customer specifications and requirements;
- b. Results of analysis; that is, do the results obtained meet the objectives established in the detailed test plan; and

Change Control

Comment: Make this section a subsection of section IV,
Project Control. (D. Arter)

First paragraph, first sentence, delete "calculations,
independent reviews," so that it reads: "Work Plans, design
reviews, etc., should be baselined and assigned..."
(D. Arter)

First paragraph, first sentence, states: "Work Plans,
calculations, independent reviews, design reviews, etc.,
should be baselined and..." Comment: the term "baselined"
should be defined, or better wording chosen. Perhaps "An
original version of Work Plans, calculations, independent
reviews, design reviews, etc., should be defined, and
subsequent versions of those items should receive revision
numbers." (D. Burrows)

Calculations

Second paragraph, first sentence, states "To make
calculations suitable for...should contain the project title,
project identification number..." Comment: The term
"project identification number" should be defined."
(D. Burrows)

- c. Were specified quality standards, calculations, and/or computer programs checked for adequacy and accuracy.

Independent reviews should be legibly documented. Reviewers should indicate the approach used for performing the review and the results of the review (i.e. acceptability of the data reviewed). Questions concerning the data should be reviewed with the originator and answered to the satisfaction of the reviewer. Unresolved questions should be elevated to a higher manager. The reviewer should sign and date the review documentation and present it to the project leader for inclusion in the project records.

V. Change Control

Work Plans, calculations, independent reviews, design reviews, etc. should be baselined and assigned revision numbers for configuration control of changes. When changes are made to one of these documents, affected project documents should be reviewed for required changes.

Drawings and drawing revisions and specifications should be controlled to ensure that incorrect or obsolete drawings and specifications are not inadvertently used. If specifications or drawings are revised, all associated documentation should also be revised.

VI. Calculations

Calculations which should be documented are those required to substantiate the design of a test article and those made during test data reduction and analysis. Calculations can be documented on a designated form, laboratory notebooks, computer output sheets or magnetic media. Calculations should be legible and sufficiently detailed such that a person qualified in the subject can understand the calculation without contacting the originator.

To make calculations suitable for filing, retrieving and reproduction, the first page of the calculation should contain the project title, project identification number, page number, name of the person making the calculation, date the calculation was made, and a cross reference to the hardware identification or the system or test phase to which the calculations apply. Project identification number and page numbers should be included on each page of the calculation.

Calculation detail should typically include identification of the objective or purpose of the calculation, design inputs and their sources, methods used and assumptions made, including identification of those assumptions requiring verification, parameters to be

Calculations

Forth paragraph, last three sentences, states "After the reviewer has completed the review...Unresolved discrepancies should be elevated to higher management." Comment: This material should be moved to section IV, under "Independent Technical Review." (D. Burrows)

Software

Comment: The discussion of software tantalizes the reader by presenting information on risk analysis, but giving little of practical value thereafter. The concepts of validation and verification are only touched upon. There is nothing on the use of overchecks. My experience has shown that most researchers use commercial packages (like Lotus 123 or StatGraphs), not the developed software run on a mainframe. Computers are now being used for data collection, data sorting, data analysis and report writing. Somehow, the Quality professional must learn how to deal with the everyday tools of the researcher, not the exotic stuff that comes along only occasionally. I would suggest some deep conversations with Taz Daughtrey on this subject. (D. Arter)

Second paragraph, first sentence, states "The risk assessment should be used in developing a quality plan..." Comment: Quality Plan - No. (D. Arter)

investigated, any references used, units, results of the analysis and conclusions, if any.

The project leader in conjunction with a superior should determine if calculations for the project require an independent review. The decision for this review should be based on the risk inherent in the use of the calculations. Calculations which may require review include calculations based on customer inputs, design engineer's calculations for test article fabrication, calculations used for analysis of test data, and calculations required to support the final report. After the reviewer has completed the review the calculation should be dated and signed by the reviewer to indicate the review was performed. The reviewer should document the results of the review and note any discrepancies. Unresolved discrepancies should be elevated to higher management.

VII. Software

Whether using an existing program, commercially acquired software or developing software internally, a risk assessment associated with the use of the software should be made. The following are suggested definitions of risk.

- a. High Risk - Errors in the software could result in significant cost, product liability or impaired customer relations.
- b. Medium Risk - Software which effects the R&D product but not to the extent that a significant cost or product liability could be incurred.
- c. Low Risk - Software which does not affect the R&D product or results produced by the software will be verified in developing the product

The risk assessment should be used in developing a quality plan which specifies the documentation, reviews and testing required to ensure that the software is an accurate implementation of the required method and that the correct results are being obtained. A risk assessment should be performed as early in the project planning as possible to identify funding requirements.

Additional controls should be performed as risk level of using the software and required effort to produce the software increases. Documentation should also increase proportionately. A minimum level of document control includes the assignment of software identification and revision level or date to be included on all software output.

Specific Comments to the ASQC Quality Assurance Guidelines for R&D
Draft 2 dated 10/10/88

Software

Forth paragraph, delete entirely (D. Arter)

Fifth paragraph, Comment: Make this the first paragraph of this section. (D. Arter)

Procurement

First paragraph, second sentence, states "The Quality Assurance department should..." Comment: Delete entirely. (D. Arter)

First paragraph, second sentence, states "The quality Assurance department should maintain..." Comment: The second sentence uses the phrase "Quality Assurance department." The section on Responsibility calls that organization the Quality Department." The third sentence under Procurement states "...records maintained by quality assurance..." The mixture of terminology might well be confusing to the uninitiated. (D. Burrows)

First paragraph, third sentence, add "or the researcher" so that it reads: "When specifying equipment purchases, the project leader should consider the experience records maintained by quality assurance ~~or the researcher~~ and the importance..." (R. Geoffrion)

First paragraph, third sentence, delete "maintained by quality assurance" so that it reads: "When specifying equipment purchases, the project leader should consider the experience records and the importance of..." (D. Arter)

First paragraph, last sentence, delete "All" so that it reads: "Researchers should assist in gathering experience information..." (R. Geoffrion)

First paragraph, last sentence, delete "to quality assurance" so that it reads: "All researchers should...as well as outstanding performances for inclusion in its supplier experience files." (D. Arter)

Second paragraph, first sentence, change "leader" to "personnel" so that it reads: "The project ~~personnel~~ should identify those procurements affecting the quality..." (R. Geoffrion)

Second paragraph, last two sentences, beginning "Purchase requisitions for code materials..." delete entirely. (D. Arter)

Second paragraph, last sentence, delete entirely. (R. Geoffrion)

Second paragraph, last sentence, states "Purchase requisitions for instrumentation should also be approved by the laboratory's Instruments Department." Comment: An organization called the "laboratory's Instruments Department" is to approve certain procurements. A university researcher might search the College of Music for such an organization! I recommend replacing the phrase with the wording "...by persons within the laboratory who are knowledgeable in the field of instrumentation." (D. Burrows)

Forth paragraph, first sentence, delete "by the project leader" so that it reads: "Records for procurements for a project should be maintained in the project files." (R. Geoffrion)

Documentation should be prepared during each phase of a development program as appropriate. As a minimum, documentation should include the program identification, a brief description of significant limitations, capabilities, intended use, and a permanent record of the source code listing.

The project leader should be held responsible for all data and other information produced with computers. Prior to using existing software, whether it has been purchased or developed internally, the project leader should ensure that the software is reviewed in sufficient detail to assure that the methods used by the software and the results obtained from the software are correct for the intended application.

VIII. Procurement

The laboratory should conduct its purchasing practices to reflect experience with supplier performance. The Quality Assurance department should maintain experience records for selected vendors meeting prescribed quality requirements. When specifying equipment purchases, the project leader should consider the experience records maintained by quality assurance and the importance of the equipment to the quality and validity of the data in specifying the extent of supplier certification and qualification testing needed. All researchers should assist in gathering experience information by reporting significant performance failures as well as outstanding performances to Quality Assurance for inclusion in its supplier experience records.

The project leader should identify those procurements affecting the quality or validity of data, code materials, and instrumentation. Quality assurance requirements should be documented on the purchase requisition. Purchase requisitions for code materials, instrumentation and any other items affecting the quality or validity of data should be reviewed and approved by the Quality Assurance department for appropriate quality assurance requirements. Purchase requisitions for instrumentation should also be approved by the laboratory's Instruments Department.

Purchase requisitions should contain a clear statement of what is required, date required, approximate cost estimate, necessary department approvals, quality assurance/code requirements, charge numbers and the name of the requisitioner.

Records for procurements for a project should be maintained by the project leader in the project files.

Inspections

Receiving Inspection

Second paragraph, last sentence, states "This information should be inputed..." Comment: The word "inputed" is jargon.
(D. Arter)

In-Process

Second paragraph, Comment: Intro is too restrictive to fabrication. Guidelines hold well for EQ testing, etc.
(D. Arter)

IX. Inspections

Receiving Inspection

Once a purchased item is received, it should be immediately inspected to verify that the material does, in fact, meet the purchase order requirements. This inspection may be performed by the Quality Control personnel or by the project leader or his designee. The inspection can be documented on a copy of the purchase order, in the project logbook, instrumentation records for an instrument or a formal receiving inspection report if one exists.

Inspection documentation should include the name and other identification of the item inspected, purchase order number, item number, characteristics inspected, certifications received, deficiencies noted, whether the item is accepted or rejected, the inspector's signature and the date the inspection was performed. This information should be inputted to the supplier experience record system.

Immediate corrective action should be taken if the material is discrepant. Appropriate identification should be used to identify material which is being held for inspection, that which has been inspected and accepted, and that which is discrepant.

Material furnished by the customer should also receive a documented receiving inspection to assure that the material is complete, undamaged, and meets all specifications previously agreed to by the Laboratory and the customer.

In-Process

Inspections are usually performed for those physical characteristics identified by the project leader as critical to the test results. The need for inspections can be identified on receiving copies of Purchase Orders, Route Sheets, Test Procedures, Inspection Checklists. The project leader should be held responsible for all inspections performed on his project. Inspections can be performed by shop personnel, quality control personnel, or technical section personnel.

Critical dimensions should have a corresponding checklist or route sheet prepared by the project leader or his designee to direct the inspection of critical dimensions. If there are construction codes involved with test apparatus fabrication, the inspection of the attributes required by Code can be handled in a similar manner. The following guidelines may be helpful.

In-Process

Forth paragraph, second sentence states "... (i.e., visual, dimensional, or type of NDE used)..." Comment: The acronym "NDE" should be spelled out, and some examples provided.
(D. Burrows)

Fifth paragraph, first and second sentences, Comment: Delete entirely, too specific to fabrication. Paragraph would begin "Nonconformances discovered during test..." (D. Arter)

- a. Inspection checklists should be used if the inspection is fairly simple and if all the characteristics can be inspected at one time.
- b. Inspections of manufacturing operations that are more complicated (many inspections required at different times) should be controlled by a route sheet.
- c. All inspections performed by the technical section regarding the condition of the test article during and after test should be documented in the project logbook.
- d. Occasionally the customer may want to witness inspection or testing operations. These witness or hold points can be included on Route Sheets or Test Procedures. The customer's representative should be asked to sign and date the above records verifying his witness of the test or to provide written authority to proceed if the hold point is waived.

Inspections can be performed by any person familiar with the operation. Inspections performed during test are usually done by the project leader or his designee. Shop inspections may be performed by the operator responsible for making the part or, if required, by an independent inspector. The project leader should determine if an independent inspector is required or if the person responsible for performing the operation can perform his own inspection. The Laboratory may wish to maintain a list of inspectors who may be called upon to perform special inspections. This list should be maintained by the Quality Department

The person performing the inspection should be responsible for the inspection documentation. Inspection documentation should include the type of inspection performed (i.e., visual, dimensional, or type of NDE used), results of the inspection, deficiencies, whether the item was accepted or rejected, reference to corrective action documentation, the inspector's signature and the date the inspection was performed.

Nonconformances detected during fabrication of the test article should be identified and documented. The article itself should be identified as discrepant and segregated until the project leader has reviewed the nonconformance and any adverse effects it may have on the test results. Nonconformances discovered during test should be documented in the project logbook. A nonconformance report may also be used. The project leader should be responsible for determining the necessary corrective action. This may require customer approval.

Material Identification and Control

First paragraph, first sentence, replace "held accountable" with "assured that procedures are in place" so that it reads: "The project leader should be assured that procedures are in place for assuring that all project materials affecting test results are identified and controlled." (R. Geoffrion)

First paragraph, second sentence, add "or their containers" so that it reads: "These controls can be accomplished by maintaining identification tags and markings on the materials or their containers so that they cannot..." (D. Arter)

Second paragraph, Comment: Too fabrication specific.
(D. Arter)

Forth paragraph, first sentence, delete "The" and change "leader" to "personnel" so that it reads: "Project personnel should maintain a list of materials...." (R. Geoffrion)

Forth paragraph, fifth sentence, states "Copies of material test reports should..." Comment: Delete entirely, too specific to B&W. (D. Arter)

X. Material Identification and Control

The project leader should be held accountable for assuring that all project materials affecting test results are identified and controlled. These controls can be accomplished by maintaining identification tags and markings on the materials so that they cannot be mixed in or confused with unidentified stock or materials from another project. Standard quality control tags such as "Hold for Inspection" tags, "Material/Part Identification" tags, green "Accepted" tags and red "Discrepancy" tags are available and can be used by the project leader to segregate and identify his material.

If materials will be needed by a support group such as a machine shop or weld shop, the project leader may want to set-up some type of central storage area so that when the support group needs to withdraw materials they are available and appropriately protected.

The project leader may choose to delegate the responsibility for material control and identification to another section within the Laboratory. The project leader should transmit all material control and identification requirements to the delegated section. The delegated section, in turn, has a responsibility to the project leader to ensure that all material control and identification requirements (e.g. heat numbers, lot numbers, etc.) are adhered to for as long as the material is in their possession.

The project leader should maintain a list of materials or parts, and components that affect the validity of the test results. The list should indicate if certified test reports or certificates of conformance are required. Any additional tests to be performed by the Laboratory to verify material identity should be specified. The project leader should maintain any test reports or material certifications in the project files. Copies of material test reports should be on file in the Quality Department for those materials used on a project or test facility which may become a "permanent" part of the Laboratory. State and local codes may influence or determine what substitutions if any are allowed. The project leader may have to obtain customer approval of any proposed material substitutions prior to utilizing the substitute material. This requirement should be made clear during initial project planning.

Nonconformances

Comment: May wanna call this section something else.
Criterion 15 is so specific to material things as to
cause last paragraph on non-material things to be
rejected by Appendix B users. (D. Arter)

First paragraph, forth sentence, states " QA should receive
copies of nonconformance reports" Comment: "QA," should be
replaced with "Quality Department" (or whichever standard
term is chosen.) The paragraph recommends providing QA with
copies of nonconformance reports, yet this paragraph and
the last paragraph under In-Process Inspections allows
nonconformances to be merely documented in a notebook. The
logging/reporting requirements should be made consistent.
(D. Burrows)

Second paragraph, third sentence, add "rework," so that it
reads: "The project leader should determine what corrective
action to take whether it be "use as is," "repair," "rework."
or "scrap." (D. Arter)

Third paragraph, first sentence, states "Nonconformances to a
quality system, such as..." Comment: The first sentence
should be changed to read "...to a quality assurance
system..." The same paragraph should require the quality
Department to be advised of the nonconformance. (D. Burrows)

Test Control

Comment: Should start off by defining "test" and fact that
this is not same concept as Appendix B "Test
Control." (D. Arter)

First paragraph, fifth sentence, states "In some cases
standardized procedures such as those published by the
American Society of Mechanical Engineers (ASME)..."
Comment: Delete reference to American Society of Mechanical
Engineers, use example outside fab arena, like EPA.
(D. Arter)

XI. Nonconformances

Nonconformances or conditions adverse to quality may occur in several areas such as problems with a vendor or misunderstanding of a test procedure by a technician. Nonconformances may be documented in project log books and should be documented on an appropriate nonconformance report. Documentation of nonconformances allows for management resolution and trending of problems. QA should receive copies of nonconformance reports. This allows QA to gather noncompliance data and perform long term collective analysis of various research projects so that undesirable trends or chronic violations can be detected and corrected. Allowing QA to be involved in the corrective action process brings their particular skills into the problem solving aspects of the quality program for the project.

If the nonconformance is on a specimen or fixture the item should be tagged with a discrepancy tag and segregated to prevent inadvertent use whenever possible. The project leader should review the nonconformance and determine what, if any, adverse effects the nonconformance will have on test data. The project leader should determine what corrective action to take whether it be "use as is", "repair", or "scrap". If a "use as is" or "repair" decision is reached the project leader must determine whether the decision will cause a deviation to any of the customer specifications or commitments agreed to during the up-front planning or detailed test plan. The project leader may have to obtain customer approval of proposed corrective actions. Once a nonconformance is satisfactorily resolved the discrepancy tag may be removed.

Nonconformances to a quality system, such as a deviation to a test plan or procedure, should also be documented on some type of nonconformance report. At the very least the nonconformance should be documented in the project logbook or somewhere in the project records. The nonconformance may require customer approval.

XII. Test Control

Tests should be identified in the planning document developed at the start of the project. Suggested Work plan contents have been discussed in Section II. After the work plan has been agreed to the test program itself may begin. Test procedures used may be documented in the project logbook as testing proceeds. In some cases standardized procedures such as those published by the American Society of Mechanical Engineers (ASME) or the American Society of Testing and Materials (ASTM) are appropriate to the testing being performed. These can be identified by number and revision in the work plan or somewhere in the project files, such as in

Test Control

First paragraph, tenth sentence, states "The procedure would contain only those steps and acceptance criteria known at the start of the test." Comment: Delete "and acceptance criteria." "Acceptance Criteria" term is bothersome to most researchers. Cannot define for most research activity.
(D. Arter)

First paragraph, twelfth sentence, states "In the case where a phenomena is being characterized there is no acceptance criteria." Comment: Generally the rule, not the exception.
(D. Arter)

Second paragraph, first sentence, states "Detail contained in test procedures should include test prerequisites, such as special operator training or certification requirements and test conditions..." Comment: Delete "special operator training or certification requirements and." This is rarely the case. (D. Arter)

Third paragraph, second sentence, delete "and facility used" so that it reads: "All recorded data should reference the project title, date, time and data taker." (D. Arter)

Third paragraph, last sentence, states "This data should reference, if not included elsewhere,..." Comment: Delete entirely. Overkill. If data sheets or logbooks used, this info is extractable elsewhere. (D. Arter)

the project logbook. Some procedures may have to be written specifically for the test. Details of performing the test may not be known at the start of the test and will be developed as the testing proceeds. These procedures can be written very open ended so that they can be developed as the test proceeds. The procedure would contain only those steps and acceptance criteria known at the start of the test. As testing continues and details of the test become more solidified the test procedure would be amended to reflect the actual testing performed. In the case where a phenomena is being characterized there is no acceptance criteria. Therefore, the test procedure should only state how the test data is to be recorded. In some cases the detailed work plan may contain enough detail that a separate test procedure is not required.

Detail contained in test procedures should include test prerequisites, such as special operator training or certification requirements and test conditions that should be verified prior to beginning the test. If tests are sequenced, or require specified inspections or independent verification of test, the procedure should require verification of the requirement prior to proceeding to the next step of the test. The procedure should contain a listing of typical test equipment to be used. Reference to specific instrumentation or equipment by serial number should be avoided since if substitute equipment is used the procedure would have to be revised. Actual equipment set-ups, including serial numbers should be documented in the project records.

Test data not processed directly through a computer or documented on computer output sheets should be recorded on formal data sheets or logbooks. All recorded data should reference the project title, date, time, data taker and facility used. This data should reference, if not included elsewhere, other documentation that describes how the test was performed, a description of the test facility, and test article, including sketches or drawings utilized, instrumentation used, test procedure and revision number or standard method used, actual parameters used and deviations from the test procedure.

Test results, calculations and/or computer programs used in the analysis and interpretation of data should be independently reviewed. The review should determine not only the mathematical correctness of the calculation but also whether the experimental objectives were met and whether the effect or interactions were interpreted correctly. This review should be performed in accordance with the paragraph on Independent Technical Review.

Instrumentation

First paragraph, fifth and sixth sentences, state "Instruments which have been designated as "indication only instruments" should be...Instruments not calibrated should not be used for taking data." Comment: Delete entirely. Too subjective and it violates the premise above. PM and researchers must decide how "calibrated" the instruments should be. (D. Arter)

Third paragraph, third sentence, states "That is, is it within its calibration interval or..." Comment: The term "calibration interval" should be defined. The uninitiated might interpret it to be the instruments tolerance or the range of values over which the calibration is valid. (D. Burrows)

Forth paragraph, third sentence, states "This group should have the power to perform initial evaluation...and calibration data (whether generated by its own people,...or calibration suppliers)." Comment: The third sentence should also task the calibration group with establishing the frequency of instrumentation recalibration. (D. Burrows)

Forth paragraph, sixth sentence, states "Out-of-calibration conditions should be evaluated by all the users of the instrument..." Question: What evaluation? Is this the same evaluation as above, that was to be performed by the central cal group? Now it should be done by users. Confusing?? (D. Arter)

Forth paragraph, last sentence, states "Activities of this centralized calibration control group should be evaluated by Quality assurance." Comment: Delete entirely. Unnecessary. QA should evaluate all. No need to single out cal group. (D. Arter)

XIII. Instrumentation

Researchers have learned that an accurately calibrated instrument traceable to NBS does not always give a measurement of the desired accuracy for the end use of the data. Accurately calibrated instruments are however important. Environmental conditions or operator error can have a devastating effect on the accuracy of a measurement. Total measurement uncertainty, random error as well as systematic error, determine whether or not a measurement is useable. Instruments which have been designated as "indication only instruments" should be used for indication purposes only and not for acquiring data on the project. Instruments not calibrated should not be used for taking data.

A documented calibration program clearly defining the responsibilities of the technical and support sections using calibrated equipment is the first step a Laboratory can take in the effort of determining the total measurement uncertainty associated with its various instrumentation. And, is the first step to providing measurement quality assurance.

The program should incorporate all measuring devices in the Laboratory. Some type of physical identification should be given to each instrument identifying it immediately as to its calibration status. That is, is it within its calibration interval or is it in need of calibration or perhaps it doesn't require calibration as it is used for rough indications only. This identification should also identify the history files for the instrument, which indicate its accuracy.

It is recommended that a centralized calibration group be established. This group would have the authority to "certify" the calibration status of an instrument and the technical expertise to oversee the calibration function. This group should have the power to perform the initial evaluation and assignment of an instrument status or category, approve calibration procedures, calibration set-ups, calibration personnel qualifications, and calibration data (whether generated by its own people, other technical sections of the Laboratory, or calibration suppliers). The centralized control group should evaluate the calibration data and determine if an out-of-calibration condition exist. If a centralized calibration group does not exist then someone in the organization experienced in calibration should perform this evaluation. Out-of-calibration conditions should be evaluated by all users of the instrument and a determination made of the acceptability of the data taken with the instrument. Activities of this centralized calibration control group should be evaluated by Quality Assurance.

Specific Comments to the ASQC Quality Assurance Guidelines for R&D
Draft 2 dated 10/10/88

Instrumentation

Fifth paragraph, second sentence, states "The project leader should document the actual instrumentation used on the project in the project records." Comment: The sentence discussing documenting the actual instrumentation used is a repetition of material presented in the section on Test Control (paragraphs 2 and 3). (D. Burrows)

Fifth paragraph, second sentence, states "The project leader should document the actual instrumentation used on the project in the project records." Comment: Not necessary for the project leader to do this. Can be researchers and technicians. (D. Arter)

Fifth paragraph, third and fourth sentences, states "If the facility being used to perform the test has its own list of instrumentation...and update his records appropriately." Comment: Delete entirely. Too specific to B&W. (D. Arter)

Reports

Last three sentences, state "The project leader should be aware that reports published...The production of effective reports is a major part of their professional performance." Comment: This material is out of place in a quality assurance guidelines document and is inconsistent with the approach taken in the other sections of the document. The other sections do not go to such lengths to justify QA requirements. (D. Burrows)

Project Records

First paragraph, third sentence, states "Suggested records which should be maintained include...test facility configuration; instrumentation; calculations and reviews;..." Comment: The third sentence should be changed to read "...test facility configuration; documentation of instrumentation; calculations...." (D. Burrows)

First paragraph, third sentence, change "design" to "peer" so that it reads: "Suggested records which should be maintained include work authorizations...inspection documentation of inspections performed; ~~peer~~ reviews, documentation of test article..." (D. Arter)

First paragraph, fourth sentence, states "Results such as preliminary plots or data should be subject to the same traceability requirements as calculations." Comment: Delete entirely. Too subjective. Researchers don't routinely perform calcs like the engineers. (D. Arter)

Second paragraph, last sentence, states "The laboratory as a whole or the...within the individual section of the laboratory are retrievable." Comment: The last sentence should be changed to read "...section of the laboratory are retrievable and safeguarded." (D. Burrows)

Second paragraph, last sentence, states "The laboratory as a whole or the...within the individual section of the laboratory are retrievable." Comment: This rarely works. Only when records are directly tied to deliverable products, will they be of value and accepted by researchers. Until then, this is just "paperwork." (D. Arter)

Even with all these controls in place it is still the project leader's responsibility to assure that the proper instrumentation is used to meet the accuracy requirements of the project. The project leader should document the actual instrumentation used on the project in the project records. If the facility being used to perform the test has its own list of instrumentation this list may be referenced in the project records. However, the project leader should be aware of instrument substitutions made on the facility during the test and update his records appropriately. The project leader should also ensure that the instrumentation used is within its calibration interval throughout the time frame of the test.

XIV. Reports

Reports will vary with regard to type, size, complexity, timing and format. Latitude should be given the project leader in choosing the particular style of report, whether it be a letter report or a more formal report, to suit the circumstances and the customer requirements agreed to during the up-front planning. All reports should be reviewed in accordance with the paragraph on Independent Technical Review. The project leader should be aware that a report published by the Laboratory is the principle evidence of the quality of its performance and ability. Personnel of the Laboratory will be judged by the contents of their reports, therefore their writing ability must match their research ability. The production of effective reports is a major part of their professional performance.

XV. Project Records

Complete documentation of the work performed by the Laboratory is quite important. Any information, memos, meeting minutes or special references that have a bearing on the direction the project has taken, the data required, or the interpretation of results should be included in the project records. Suggested records which should be maintained include work authorizations and any revisions; all customer communications; documentation of purchased or customer furnished materials; inspection documentation of inspections performed; design reviews; documentation of test article or test facility configuration; instrumentation; calculations and reviews; reference to computer programs used and reviews; procedures used and all test data. Results such as preliminary plots or data should be subject to the same traceability requirements as calculations. The project leader should be held responsible for maintaining all project records.

All project records should be identified in enough detail that they can be easily filed, retrieved, and reproduced at a later date. The Laboratory as a whole or the

Audits

First paragraph, first sentence, delete "performed under standard laboratory practice," change "projects" to "they," delete "being" and change "performed" to "performing" so that it reads: "The purpose of auditing projects is to characterize how they are performing with respect to general Laboratory guidelines." (D. Arter)

First paragraph, third sentence, states "Quality Assurance should maintain general surveillance over all projects conducted at the Laboratory." Question: Is "surveillance" the same as "audit?"

First paragraph, fourth sentence, states "Checklist for these audits should be taken from the guidelines and requirements for the various administrative systems utilized during the course of a project." Comment: No! Must include more than admin. stuff. Delete "for the various administrative systems." (D. Arter)

First paragraph, fourth sentence, states "Checklists for these audits...." Comment: The term "checklists" should be defined. (D. Burrows)

First paragraph, sixth sentence, states "A checklist of standard questions applicable to any project audited should be designed." Comment: Unwise, shuts the brain down. (D. Arter)

First paragraph, seventh sentence, states "For support systems which may or may not be used..." Comment: Better to audit support systems as a whole, using current projects as test. (D. Arter)

First paragraph, last sentence, states "The auditor should feel free to deviate from the checklist..." Comment: True, but unnecessary. Delete sentence entirely. (D. Arter)

Second paragraph, first sentence, states "The audit report should be written to the upper management...recommendations and detailed analysis of the audit results." Comment: "Recommendations and detailed analysis of the audit results" not always practiced or required. (D. Arter)

Second paragraph, second sentence, states "Supplemental reports can be written to summarize..." Comment: Delete entirely. Too specific to B&W. (D. Arter)

Second paragraph, last sentence, states "Audit data should be summarized statistically..." Comment: Disagree, this is the Audit Team Leaders job. (D. Arter)

individual technical sections should devise and maintain a standard system by which all project records within the individual section of the Laboratory are retrievable.

XVI. Audits

The purpose of auditing projects performed under standard laboratory practice is to characterize how projects are being performed with respect to general Laboratory guidelines. Audits may be performed and reported on an individual project basis or a large statistical sampling, providing a desired level of confidence in the audit data, of projects may be taken to determine compliance of the entire laboratory. Quality Assurance should maintain general surveillance over all projects conducted at the Laboratory. With a more detailed review or audit being performed periodically. Checklists for these audits should be taken from the guidelines and requirements for the various administrative systems utilized during the course of a project. A checklist of standard questions applicable to any project audited should be designed. For support systems which may or may not be used by the projects, such as the purchasing function, a separate checklist should be developed and used when applicable to the project being audited. The auditor should feel free to deviate from the checklist and pursue an independent line of questioning when answers given appear to warrant this type of questioning.

The audit report should be written to the upper management of the Laboratory and should include an introduction, summary of significant results, conclusions, recommendations and detailed analysis of the audit results. Supplemental reports can be written to summarize the results of each individual technical section and their relationship to the entire laboratory if the section manager should request it. Audit data should be summarized statistically so that the reader of the audit report can make up his own mind as to the importance of the statistic to the laboratory or to his individual technical section and whether corrective action is required.

If appropriate, statistical sampling giving a desired level of confidence in the data reported can also be used when conducting generic systems audits. Major systems, such as purchasing and drawing control, have an enormous data base to audit. To audit 100% would be time consuming and impractical. Because a generic system usually involves only a handful of controlling procedures, a checklist which covers all aspects of the procedures is more easily designed and a very good degree of statistical inference can be made as to the degree of actual compliance. Again a statistical report showing significant trends using percentages and graphics, allowing the numbers to speak for themselves is best. Deviations from Laboratory practice and the approach to

Audits

Third paragraph, last sentence, states "The auditor's judgement and experience should take over from the unbiased objectivity of the pure numbers presented." Comment: This sentence needs to be rewritten and clarified. (D. Burrows)

Third paragraph, Comment: Delete entirely. While useful, this paragraph is too specific to conduct of the audit. Keep in mind the basic purpose of the whole document. (D. Arter)

Forth paragraph, fourth and fifth sentences, states "It may be beneficial to the Laboratory for its audit teams to include...thus giving the audit more credibility." Comment: Yes! But not just for supplier audits. Should be practiced on internal audits too. (D. Arter)

Forth paragraph, sixth sentence, delete "to the supplier" so that it reads: "An audit report should be written and transmitted within one week of performing the audit." (D. Arter)

Forth paragraph, seventh sentence, delete "by the supplier" and change "Laboratory" to "auditors" so that it reads: "Noncompliances should be addressed and a response returned to the auditors within a specified time." (D. Arter)

Forth paragraph, eighth sentence, delete "from the supplier" and "and whether the supplier will receive approval" so that it reads: "Responses received should be evaluated and a decision should be made as to the acceptability of the response." Comment: You're confusing pre-award survey and audit during performance of contract. (D. Arter)

Forth paragraph, last sentence, states "Final verification of implementation...audit if the findings are relatively minor..." Comment: Findings needs to be defined. (D. Arter)

Forth paragraph, sixth through last sentence, states "An audit report should...or reaudit if they are major." Comment: Separate paragraph, concepts applicable to both internal and external audits. (D. Arter)

Training

The section should recommend that training be documented and the documentation retained as a record. This would also be a good section in which to recommend documentation of personnel qualifications. (D. Burrows)

corrective action are dependent upon the seriousness of the noncompliance found. Serious noncompliances should not go uncorrected just because there is a lack of sufficient statistical data to prove a trend exists. The auditor's judgement and experience should take over from the unbiased objectivity of the pure numbers presented.

Audits of suppliers are similar to audits of any other Laboratory process. Audits of instrumentation and calibration suppliers should be of particular importance. Like other audits, supplier audits should be performed periodically with a checklist designed to meet the requirements of the activity being audited. It may be beneficial to the Laboratory for its audit teams to include not only a QA auditor but also a technical expert in the area being audited. An audit team composed of a technical expert and QA Auditor can perform a more thorough audit thus giving the audit more credibility. An audit report should be written and transmitted to the supplier within one week of performing the audit. Noncompliances should be addressed by the supplier and a response returned to the Laboratory within a specified time. Responses received from the supplier should be evaluated and a decision should be made as to the acceptability of the response and whether the supplier will receive approval. Final verification of implementation of the committed action items may be held off until the next regularly scheduled audit if the findings are relatively minor, or they may be the subject of a special follow-up action or reaudit if they are major.

XVII. Training

Introduction of a Quality Program to a Research Laboratory will require some employee indoctrination. One way this can be accomplished is by the Quality Department presenting mandatory training seminars. However, a better way would be for upper managers to train lower managers in the quality practices to be followed and the lower managers in turn then train the researchers. This approach again shows management ownership of the Quality Program and gives more meaning to the training received by the researchers. Many laboratories are divided into various disciplines. This approach allows the management of the various disciplines to emphasize the procedures it feels most important to the type of research it performs thus allowing a tailor fit quality program.