



Boston Government Services LLC

CONTROL OF SUSPECT/COUNTERFEIT ITEMS

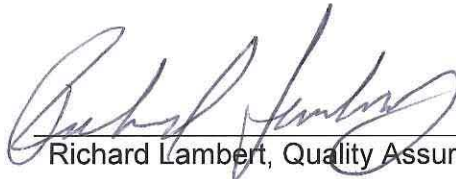
BGS-QA-24

Revision 2

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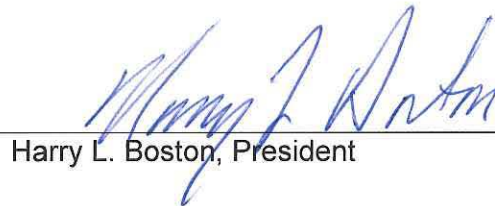
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3-2-16

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3/2/2016

Date

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Revision History

Rev. #	Date	By	Type¹	Changes
0		T. Graben-Galyon	N	Original issue
0 mc1		H. Boston	mc	Corrected typographical and formatting errors
1	10/1/2015	R. Lambert	M	Procedure Rewrite as part of Extent of Condition Review resulting from DOE EM Supplier's Audit.
2	2/15/16	R. Lambert	M	<ol style="list-style-type: none"> 1) Incorporated new procedure formatting. 2) Updated to new procedure references. 3) Procedure has been revised to address CAR-15-17 corrective action #6. 4) Updated S/CI Indicators. 5) General procedure updates.

¹ M = major change, mc = minor change, N = new

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1. PURPOSE

This procedure establishes the requirements and processes used by Boston Government Services, LLC (BGS) for the identification, control, and disposition of suspect/counterfeit items (S/CI).

2. SCOPE

This procedure applies to BGS activities involving suppliers/subcontractors who provide items or services subject to S/CI requirements imposed by a BGS customer [e.g., U. S. Department of Energy (DOE)]. This procedure applies to the procurement process in that it provides instructions to prevent the purchase and/or delivery of items that are or may contain S/CIs.

3. REFERENCES

- 3.1. BGS-QAP-01, *Corporate Quality Assurance Plan*
- 3.2. BGS-PC-01, *Procurement* (formerly BGS-QA-04)
- 3.3. BGS-QA-07, *Control of Purchased Items and Services*
- 3.4. BGS-QA-15, *Nonconformances*
- 3.5. BGS-QA-23, *Supplier Qualification*
- 3.6. IAEA-TECDOC-1169, *Managing Suspect and Counterfeit Items for Nuclear Industry*
- 3.7. DOE O 221.1A, *Reporting Fraud, Waste, and Abuse to the Office of Inspector General*
- 3.8. DOE M 231.1-2, *Occurrence Reporting and Processing of Operations Information*
- 3.9. DOE G 414-1-2B, *Quality Assurance Program Guide*

4. DISCUSSION AND OVERVIEW

- 4.1. BGS does not receive, inspect, accept, store, install, or use hardware items as defined herein. In instances where BGS is required to provide procurement services for such items and is also required to provide inspection and/or test services, BGS will subcontract for the inspection/test service(s) and pass through all customer's requirements to the subcontractor. This procedure is limited in scope to ensuring S/CI-related customer requirements are met.

5. DEFINITIONS AND ACRONYMS

BGS Boston Government Services, LLC

Item An all-inclusive term used in place of any of the following: appurtenance, assembly, component, equipment, material, module,

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part, product, software, structure, subassembly, subsystem, system, unit, or support systems. (10 CFR 830.3)

Suspect Item Items where there is an indication or suspicion that they may not be genuine.

Suspect/Counterfeit Item (S/CI) An item which is suspect when inspection or testing indicates that it may not conform to established Government or industry-accepted specifications or national consensus standards or whose documentation, appearance, performance, material, or other characteristics may have been misrepresented by the vendor, supplier, distributor, or manufacturer. A counterfeit item is one that has been copied or substituted without legal right or authority or whose material, performance, or characteristics have been misrepresented by the vendor, supplier, distributor, or manufacturer. Items that do not conform to established requirements are not normally considered S/CI's if non-conformity results from one or more of the following conditions (which must be controlled by site procedures as nonconforming items):

- (1) defects resulting from inadequate design or production quality control;
- (2) damage during shipping, handling, or storage;
- (3) improper installation;
- (4) deterioration during service;
- (5) degradation during removal;
- (6) failure resulting from aging or misapplication; or
- (7) other controllable causes. (IAEA-TECDOC-1169)

S/CI POC BGS S/CI program point of contact.

6. RESPONSIBILITIES

6.1. BGS President identifies the position responsible for S/CI activities and for serving as the BGS S/CI Program Point of contact (S/CI POC) for the BGS S/CI program.

6.2. The Contracts Manager is responsible for

6.2.1. Ensuring S/CI requirements included in customer procurement documents are flowed through to BGS' suppliers/subcontractors through appropriate language in BGS procurement documents.

6.2.2. Providing an interface with suppliers/potential suppliers.

6.3. The S/CI POC is responsible for

6.3.1. Ensuring BGS customer S/CI requirements have been included in BGS' supplier/subcontractor procurement documents.

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6.3.2. Reviewing and ensuring BGS suppliers'/subcontractors' S/CI policies and/or procedures meet customers' requirements.

6.3.3. Serving as the point of contact with the DOE Office of Health, Safety, and Security.

6.3.4. Prepares and provides information and training on S/CI processes and controls to BGS personnel.

6.4. The Quality Assurance (QA) Manager is responsible for evaluating and accepting supplier/subcontractor S/CI policies and/or procedures.

7. PROCEDURE

7.1. The S/CI POC ensures BGS Personnel involved with BGS customers that require an S/CI program are trained on the S/CI process and controls (including prevention, detection, and disposition of S/CIs).

NOTE: S/CI awareness information and training manual can be located at the DOE website (<http://www.hss.energy.gov/csa/csp/sci/>). Select S/CI awareness Training Manual.

7.2. The S/CI POC ensures BGS procurement documents for items subject to customer-imposed S/CI controls contain quality clauses prohibiting delivery of S/CIs according to BGS-PC-01, *Procurement*.

7.3. The S/CI POC ensures procurement documents for items subject to customer-imposed S/CI controls state the appropriate technical specifications and documentation requirements, and that the items are subject to source/receipt inspection to ensure their authenticity according to BGS-QA-07, *Control of Purchased Items and Services*.

7.4. The S/CI POC ensures procurement documents for items subject to customer-imposed S/CI controls require a Certificate of Conformance (CoC) from the supplier indicating all items delivered or to be delivered are free of S/CIs, per BGS-PC-01, *Procurement*.

7.5. If an item is discovered that meets or is thought to meet the definition of an S/CI, then the S/CI POC ensures the item is controlled according to BGS-QA-15, *Nonconformance*.

7.6. The S/CI POC ensures subcontracted inspection and/or test services for items subject to customer-imposed S/CI controls are only provided by entities that have personnel trained in and suitable procedures for the detection and disposition of S/CI. Qualification of applicable subcontractors shall be according to BGS-QA-23, *Supplier Qualification*.

7.7. The S/CI POC ensures the following actions are completed if an S/CI is detected:

7.7.1. Contacts the DOE Office of Health, Safety, and Security for determination of BGS support actions to 7.7.2 and 7.7.3 below.

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7.7.2. Reports to the DOE Inspector General (per DOE O 221.1A, *Reporting Fraud, Waste, and Abuse to the Office of Inspector General*) before destroying or disposing of S/CIs and corresponding documentation.

7.7.3. Supports initiation of an Occurrence Report, per DOE M 231.1-2, *Occurrence Reporting and Processing of Operation Information*.

NOTE: BGS scope of services does not include the operation of a nuclear facility, therefore BGS has not established an Occurrence Report process. BGS will notify the DOE contracting representative and provide necessary information to support preparation of the Occurrence Report.

8. RECORDS

8.1. There are no QA Records generated by this procedure.

9. ATTACHMENTS

9.1. Attachment 1 – Suspect/Counterfeit Indicators

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ATTACHMENT 1 – S/CI Indicators

This attachment presents typical examples of S/CI indicators and is for information only.

General Indicators for Identifying Suspect/Counterfeit Items. Items may be suspect or counterfeit when:

- A. Nameplates, labels or tags have been altered, photocopied, silk-screened, or painted over; are not secured well; are unusual in location; show incomplete data; or are missing. Preprinted labels will normally show typed entries.
- B. Item has wear marks or scratches on external surfaces.
- C. Obvious attempts at beautification have been made, such as excess painting or wire brushing; evidence of hand painting (touch-up); stainless steel is painted; non-ferrous metals (e.g., copper, brass, bronze) are clean and bright indicating recent polishing.
- D. Handmade parts are evident, such as rough-cut gaskets, shims and thin metal part edges show evidence of cutting or dressing by hand tools (filing, hacksaw marking, and use of tin snips or nippers).
- E. Hand tool marks exist on fasteners or other assembly parts (upset metal exists on screw or bolt head) or dissimilar parts are evident (e.g., seven of eight bolts are of the same material and one is of different material).
- F. Poor fit between assembled items.
- G. Metallic items are pitted or corroded.
- H. Casting markings have been ground off and item has been re-stamped with other markings.
- I. Configuration is not consistent with other items from the same supplier or varies from that indicated in supplier literature or drawings.
- J. Inconsistency between vendor name on the item and on the shipping container.
- K. Nameplates attached with inconsistent fasteners, such as screws instead of rivets or rivets and screws.
- L. Nameplates attached in a different location than normal.
- M. Nameplates that appear old or worn, with paint on them, or look newer than the component.
- N. Nameplates missing manufacturer's standard markings, stamps, or logos or with irregular stamping or inconsistent type style.
- O. Differing appearances of items in the same shipment.
- P. Unusual boxing and packaging of item. Packaging inconsistent with supplier's normal packaging or documentation requirements.
- Q. Item is offered at unusually low price.

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- R. Unusual disclaimers or denials of responsibility for the accuracy of test results, etc.
- S. Supplier is not a factory-authorized supplier.
- T. Dimensions of the item are inconsistent with the specification requested on the purchase order and that provided by the supplier at the time of shipment.
- U. Item or component matches the description of one that is listed on a suspect item list (e.g., DOE Suspect Fastener Headmark List).

Documentation may be suspect or counterfeit when:

- A. The use of correction fluid or correction tape is evident. Type style, size, or pitch change is evident.
- B. The document is not signed, initialed when required, is excessively faded or unclear (indicating multiple, sequential copying), or is missing data.
- C. The name of the document approver or his/her title cannot be determined; the document has missing (or illegible) signature(s), initial(s), or data; or the printed approval name and signature do not match.
- D. Technical data are inconsistent with Code or Standard requirements (e.g., no impact test results are provided when impact testing is required, or physical test data indicate no heat treatment when heat treatment is required; chemical analysis indicates one item, physical tests indicate another, etc.).
- E. Certification or test results are identical among items when normal variations should be expected.
- F. Document traceability is not clear. The documentation should be traceable to the items procured.
- G. Documentation is not delivered as required by the purchase order or is in an unusual format.
- H. Document is excessively faded, photocopied, or unclear.
- I. Corrections are not properly lined-out, initialed, and dated.
- J. Handwritten entries are on the same document where there is typed or preprinted data.
- K. Text on page ends abruptly and number of pages conflicts with transmittal.
- L. Inconsistent configuration between product and product literature.
- M. Lines on forms are bent, broken, or interrupted indicating data having been deleted or exchanged by "cut and paste."
- N. Data on a single line are located at different heights.
- O. Product recall.
- P. No or incomplete documentation.

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Indications of Suspect Electrical Components

A. General Indications

1. Screwdriver marks on terminals
2. Different screw types or materials on terminals
3. Handwritten or typed rather than stamped tags
4. Missing tags (usually Nationally Recognized Test Laboratories (NRTL) approval tag)
5. Pitted or worn contacts and lugs
6. Not in manufacturer's box or container
7. Signs of paint or smoke
8. Insufficient nameplate information
9. Missing terminals
10. Screws used in place of rivets
11. Body worn or discolored
12. Rough metal edges
13. Scratched or marred surfaces
14. Metal color inconsistencies
15. Modified or re-stamped nameplates
16. Improper fastening of nameplates
17. Plastic parts of different colors
18. Discolored or faded manufacturer's labels
19. Past due calibration stickers (internal and external)
20. Broken or damaged solder terminations
21. Broken or damaged termination lugs
22. Contact surfaces that do not mate properly
23. Lubrication that appears to be old
24. Shipping in plain packaging (no manufacturer bar code)
25. Used or damaged parts in new packaging

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B. Specific Indications

1. Molded Case Circuit Breakers
 - a. Handle modified to change ampere rating;
 - b. Style is no longer manufactured;
 - c. Unusual packaging: bulk packaging, generic packages, and cheap appearance;
 - d. Refurbisher's name on breaker;
 - e. Broken seal between halves;
 - f. Contradicting amperage ratings; and
 - g. Use of silicone sealant.
2. Fuses
 - a. Label missing or weathered; and
 - b. Wear marks on bases.
3. Power (Draw out) Circuit Breakers
 - a. Different color or shape of over current devices; and
 - b. Suspicious- looking auxiliary trip devices.
4. Motor Starters with poor fitting or wrong voltage rated operating coil.
5. Motor Control Centers
 - a. Breakers that are not easily opened or closed with compartment door closed; and
 - b. Exposed buss work with compartment doors open.
6. Electromechanical Relays with poor or loose-fitting relays
7. Potter-Brumfield Relay
 - a. Sloppy coil lead solder joints;
 - b. Painted relay base grommets (normally clean);
 - c. Terminal strips fastened with eyelets;
 - d. Painted rivets fastening the terminal strip to the relay housing;
 - e. Use of bubble wrap (plastic with Styrofoam should be used);

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- f. Termination screws in brown paper bags (should be in clear, heat-sealed plastic bags)
 - g. Repainted inner bell surface;
 - h. Missing or inconsistent date codes, inspection stamp, and test stamp;
 - i. Incorrect shaft relay cover clearance, shaft play, and lack of bearing lubricant;
 - j. Tops of rotor shafts painted a color other than black;
 - k. Non-uniform numbers stamped on the contact decks, indicating decks made up from various relays; and
 - l. Incorrect coil.
8. Capacitors
- a. Polished surfaces scratched or dented;
 - b. Termination lugs scarred;
 - c. Buildup of debris and dirt in termination guards; and
 - d. Plain packaging (no manufacturer bar codes).