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| QNP | Corrective Action: OP-102-01 rev NC |
| Corrective Action | <p>Effective Date: 2-14-18 Owner Approval by Andrew Adams, QA Manager, on 2-14-18 Management Approval by Craig O. Garneau, President on 2-14-18</p> <p><i>Printed copies of this document are for information purposes only and are uncontrolled. Printed copies are not valid after the date of printing.</i></p> |

1. PURPOSE

To establish a consistent process for taking action to eliminate the causes of nonconformities and prevent their reoccurrence.

2. RESPONSIBILITY

The table below identifies QNP personnel and their responsibility relating to this procedure:

| Person | Responsibility |
|------------------------|---|
| QNP Personnel | Identify nonconforming product and process nonconformities, and communicate them to their supervisors. |
| Department Supervisors | Provide QNP Management with data regarding process and product nonconformities, risks, and opportunities for improvement. Provide corrective action plans to Management as assigned. |
| QNP Management | Review data on reported nonconformities on a regular basis. Establish and implement plans to correct, improve or prevent nonconformities. |
| Quality Assurance Team | Initiate, monitor and track corrective action requests. Assist Department Supervisors in establishing and implementing corrective action plans. Follow up on Corrective Action Requests to ensure they are carried out properly, and measure the results for effectiveness. |

3. APPLICABLE FORMS OR REFERENCES

The table below identifies the code number and title of documents and references applicable to this procedure;

| Form/Reference Number | Title |
|-----------------------|---|
| AS9100 | Quality Management Systems - Requirements for Aviation, Space and Defense Organizations |
| OP-84-01 | Purchasing |
| OP-86-01 | Production Inspections |
| OP-92-01 | Internal Audits |
| WI-87-01 | Customer Complaints |
| FM-87-01 | Escape Form |
| FM-102-01 | Corrective Action Request Form |

4. General Policies & Procedures

4.1 - When a nonconformity occurs, including those arising from customer complaints (ref: Customer Complaints, WI-87-01), QNP shall react by;

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| a | Taking action to control and correct the nonconformity, and deal with the consequences |
| b | Evaluating the need for action to eliminate the cause(s) of the nonconformity, to prevent its reoccurrence by: <ul style="list-style-type: none">• Reviewing and analyzing the nonconformity• Determining the causes of the nonconformity (including human factors, as appropriate)• Determining if similar nonconformities exist, or could potentially occur |
| c | Implementing any action needed |
| d | Reviewing the effectiveness of the corrective action taken |
| e | Updating the risks and opportunities determined during planning when necessary |
| f | Making changes to the quality management system when necessary |

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| g | Flowing down corrective action requirements to our suppliers when it is determined they share responsibility for the nonconformity. Ref: Purchasing, OP-84-01 |
| h | Taking action when timely and effective corrective actions are not achieved. |

4.2 - Corrective actions may be measured for effectiveness by Management through:

- Follow up research
- Customer feedback and customer complaints: ref WI-97-01, Customer Complaints
- Internal Audits: ref OP-92-01
- Process Inspection Reports: ref OP-86-01 Production Inspections
- Other

4.3 - A Corrective Action Request (CAR), FM102-01, is used to document and formalize a course of action intended to resolve a problem, improve a process, or address a risk. The Corrective Action Request Form shall contain:

- A description of the nonconformance
- The nature of the nonconformance
- The root cause of the nonconformance
- The action taken to prevent recurrence of the nonconformance
- The results of the action taken
- Documentation of the evidence of effectiveness of the corrective action plan

4.4 - Corrective Action Requests may be generated by;

- QNP Management
- a QNP customer
- a regulatory organization or registrar
- Personnel designated by QNP Management - ex. Internal auditors, quality personnel.

4.5 - Corrective Action Requests, FM-102-01, are assigned a unique serial number, and should be coded with a prefix appropriate to the nature of the CAR;

- P = Process/Product Nonconformance Corrective Action Request
- A = Internal Audit Corrective Action Request
- C = Customer Complaint Corrective Action Request
- E = External/Customer Audit Corrective Action Request
- S = Supplier Corrective Action Request
- X = Preventive Action Request

4.8 - When the corrective action process has determined the cause of a non-conformity, it should be determined if additional non-conforming product exists due to the cause, and if further action is required.

5. - Schedule/Timeliness

5.1 - QNP Management will determine an appropriate time frame for the activities outlined in a CAR, as well as a time frame for any follow up activities.

5.2 - QNP Management is responsible for periodically reviewing open corrective actions to ensure that they are being investigated, acted upon, followed up for effectiveness and closed in a timely manner. The amount of time appropriate to complete a corrective action request shall depend of the nature and severity of the non-conformance, the scope of the action required, and the risk that QNP's customers may receive non-conforming product. Time extensions may be granted as appropriate/necessary.

5.3 - QNP's top management shall take appropriate action when timely and effective corrective actions are not achieved. Possible actions may include:

- Re-assessment of the priority of the CAR.
- Re-assignment of due dates and/or personnel responsible.
- Initiating a CAR or special audit to determine the breakdown in the Corrective Action process.

5.4 - As appropriate, throughout the Corrective Action process, assigned personnel should provide the CAR creator(s) with progress updates.

6. Implementation of Corrective Action

The steps in the table below provide a general outline of the Corrective Action Process.

| Step | Action | Person(s) Responsible |
|------|--|---|
| 1. | Review one or more of the following inputs: <ul style="list-style-type: none">• Escape form, FM-87-01• Audit finding• Customer complaint• Data related to process or product nonconformities• Supplier Performance Data• Identified Risks | QNP Management, Quality Assurance Personnel |
| 2. | Determine that action can be taken to prevent the recurrence of product or process nonconformities | QNP Management, Quality Assurance Personnel |
| 3. | Describe the problem in the appropriate area of the Corrective Action Request FM-102-01, and forward to the appropriate personnel for root cause analysis. | QNP Management, Quality Assurance Personnel |
| 4. | Perform root cause analysis of the identified problem to achieve a thorough understanding of the causes of the nonconformance, and document on the Corrective Action Request, FM-102-01. | Assigned Personal |

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| 5. | Develop a corrective action plan to eliminate the causes of the nonconformance, and document on the Corrective Action Request, FM-102-01. | Assigned Personal |
| 6. | Implement the corrective action plan as described in Step 5 and record the results on the Corrective Action Request, FM-102-01. | Assigned Personal |
| 7. | After an appropriate amount of time has passed, collect objective evidence to demonstrate that the corrective action has achieved long term effectiveness, and document on the Corrective Action Request, FM-102-01. If it is determined that the corrective action plan has not been effective, return to Step 4 | Assigned Personal |
| 8. | Close out the Corrective Action Form, FM-102-01, and report the results to QNP Management. | Assigned Personal |
| 9. | Review corrective actions and their results in Management Review Meetings to ensure the continuing effectiveness and continual improvement of the Quality Management System | QNP Management |

7. RECORDS/OBJECTIVE EVIDENCE

The retention duration for records referenced in this procedure are available on-line in the FM-75-01 Master Document List with Revision History.

Records are maintained in accordance with OP-75-01 Control of Documented Information.

8. REVISION HISTORY

Revision, approved date, effective date, and a document change summary for this document is located on-line in the FM-75-01 Master Document List with Revision History.