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 BREEZE • EASTERN <small>Be Ready. Be Sure.</small>	<u>QUALITY</u> Controlling Department	<u>1 / 9 / 2025</u> Release Date
<h2 style="text-align: center;">CONTROL OF NON-CONFORMING MATERIALS AND PROCESSES</h2>		
Notes:		

RELEASE DATE: _____ *1-9-2025*

(signature / date; to be filled in only after all approvals received)

Approvals:

Operations:	Print	Bryan Krause	Signature	Approved in QT9	Date:	1/7/2025
Engineering:	Print	Jim Fett	Signature	Approved in QT9	Date:	12/24/2024
Quality:	Print	Alan Moss	Signature	Approved in QT9	Date:	12/24/2024
Process Owner:	Print	Lars Novak	Signature	Approved in QT9	Date:	12/30/2024
Finance:	Print	N/A	Signature	N/A	Date:	N/A
Sales & Marketing:	Print	N/A	Signature	N/A	Date:	N/A
Legal:	Print	N/A	Signature	N/A	Date:	N/A
President:	Print	N/A	Signature	N/A	Date:	N/A
Purchasing:	Print	Gary Embley	Signature	Approved in QT9	Date:	12/23/2024
Inspection:	Print	Rich Doherty	Signature	Approved in QT9	Date:	1/7/2025
Plant Mgr:	Print	Scott Fawcett	Signature	Approved in QT9	Date:	1/6/2025
FAA:	Print	N/A	Signature	N/A	Date:	N/A
Author:	Print	Lars Novak	Signature	<i>Lars Novak</i>	Date:	12/19/2024

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1.0 PURPOSE & SCOPE:

1.1 Purpose:

- 1.1.1 This procedure establishes the system for identification, control, and disposition of non-conforming material and processes.

1.2 Scope:

- 1.2.1 This procedure applies to all shippable parts, sub-assemblies, final assemblies, and software products manufactured or procured by B-E.
 - 1.2.1.1 For Customer approval of MRB and concessions, reference OP 13.2.
- 1.2.2 Material and/or products shipped to a customer, which is subsequently returned as non-conforming material is handled in accordance with OP 19.1.
 - 1.2.2.1 The exception is in the case of Overhaul and Repair (O&R) FAA material and/or products returned. These are handled in accordance with the Repair Station Manual.
- 1.2.3 When a non-conformity occurs requiring corrective action, it is handled per OP 14.1.

2.0 REFERENCES & REGULATIONS:

2.1 Procedures


- 2.1.1 OP 06.2 – Supplier Processing of Non-Conforming Material – Processes
- 2.1.2 OP 07.1 – Customer Owned Property
- 2.1.3 OP 07.2 – Government Owned Property Control
- 2.1.4 OP 13.2 - Customer Approval of MRB and Concessions
- 2.1.5 OP 14.1 – Corrective and Preventive Action
- 2.1.6 OP 14.2 - Product Safety and Integrity
- 2.1.7 OP 16.1 – Documented Information Retention
- 2.1.8 OP 17.1 – Compliance Evaluation Audits
- 2.1.9 OP 18.1 – Training Program
- 2.1.10 OP 19.1 – Overhaul and Repair of Customer Owned Product
- 2.1.11 OP 21.1 - Special Requirements for FAA – PMA Products
- 2.1.12 Q13.001 - Procedure for the Completion of Rejection Documents
- 2.1.13 Q13.002 –Completion of Rejection Documents in QT9
- 2.1.14 QP-217 - Counterfeit Parts Prevention
- 2.1.15 RSM – B-E's FAA Repair Station Manual

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2.2 Forms

- 2.2.1 Form BE-033 Scrap Ticket
- 2.2.2 Form M-122 Final O&R Scrap Parts List
- 2.2.3 Form QC-1071 Rejection Tag
- 2.2.4 Form QC-1140 Request for Re-Inspection
- 2.2.5 Form QC-1202 Material Review Board Form
- 2.2.6 Form QC-1256 MRB Log Form
- 2.2.7 Form QC-1222 MRB Accepted Material Control Form
- 2.2.8 Form QC-1300 Scrap Submittal And Backlog Form
- 2.2.9 Form QC-1408 MRB Member Posting

2.3 Other Documents/Software

- 2.3.1 AS9100D – Quality Management Systems – Requirements for Aviation, Space, & Defense Organizations
- 2.3.2 ISO14001:2015 – Environmental Management Systems – Requirements With Guidance For Use
- 2.3.3 NCP – QT9 QMS Software/NCP Module
- 2.3.4 CAR – QT9 QMS Software/CAR Module

2.4 Regulatory Requirements


- 2.4.1 FAA FAR Part 21.137 – Quality System
 - 2.4.1.1 (h) Nonconforming product and article control
 - 2.4.1.2 (n) Quality escapes
- 2.4.2 FAA FAR Part 21.303 – Certification Procedures for Products and Parts

3.0 ABBREVIATIONS & DEFINITIONS:

3.1 Abbreviations

- 3.1.1 B-E – Breeze-Eastern
- 3.1.2 ESS – Environmental Stress Screening
- 3.1.3 FAA – Federal Aviation Administration
- 3.1.4 ICAR – Internal Corrective Action
- 3.1.5 MRB – Material Review Board
- 3.1.6 O & R – Overhaul and Repair
- 3.1.7 PMA – Part Manufacturing Approval
- 3.1.8 PMR – Preliminary Material Review
- 3.1.9 QAR – Quality Assurance Representative

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- 3.1.10 ST – Scrap Ticket
- 3.1.11 SCI – Software Configuration Index
- 3.1.12 VCAR – Vendor/Supplier Corrective Action
- 3.1.13 WIP – Work In Process
- 3.1.14 NCP – Nonconforming Product (QT9 QMS Software/NCP Module)

3.2 Definitions

- 3.2.1 Re-grade – the process by which a non-conforming part or product is altered for end use other than its original intended purpose.
- 3.2.2 Non-conformity – A non-fulfillment or failure to meet a stated or implied requirement (need, expectation, or obligation).
- 3.2.3 Quality Escape – product(s) / article(s) or service that have been released from the quality system and that do not conform to the applicable design data or quality system requirements.

4.0 RESPONSIBILITIES:

4.1 Departmental Responsibilities


- 4.1.1 The disposition of non-conforming materials and the purging of discrepant materials are made through PMR/NCP, or the MRB as described herein unless actions are specified in the ATPs or Engineering documentation.
 - 4.1.1.1 Normally, restarting of testing after failure and rework are accomplished is acceptable.
 - 4.1.1.2 Interruption of ESS, etc. (e.g., due to power failures) during normal testing shall be restarted from the beginning.
 - 4.1.1.3 If a condition exists where there is a question as to the action to be taken, it is treated as a non-conformity and requires a MRB decision for a final disposition.
- 4.1.2 The head of Quality approves the members of the MRB and PMR/NCP activities. The criteria for this approval is described herein.
 - 4.1.2.1 A listing of the members of the PMR/NCP and MRB activities is maintained on the door to the MRB crib, and is approved by the head of Quality. A copy of the approved listing is maintained on file, in the Quality Department.
 - 4.1.2.2 Form QC-1408 identifies the personnel from each organization by name and their sign off/approval authority for both PMR/NCP

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dispositions and MRB actions. Personnel not authorized on this Form are prohibited from authorizing or approving NCP dispositions.

4.1.3 MRB

- 4.1.3.1 Only Quality Engineering and Design Engineering personnel are authorized to make MRB decisions. These persons are employed by B-E as Quality Engineers, Project Engineers, Engineering Managers (Quality, Mechanical, Electrical, and Drafting), head of Quality, or head of Engineering. The Quality representative is the MRB chairman. MRB dispositions require a signed design analysis outlining the engineering rationale for the action(s) taken.
- 4.1.3.2 Unless Breeze-Eastern has been granted MRB authority on characteristics covered by contractual drawings or specifications, such non-conformances are submitted to the government / customer in accordance with contractual requirements or customer directions.
 - 4.1.3.2.1 However, unless otherwise restricted within the contractual requirements, B-E designed product which is controlled via a customer specification may be dispositioned as use-as-is or repair, provided the non-conformity does not result in a departure from customer specified requirements.
 - 4.1.3.2.2 Following the review and disposition of discrepant material by B-E Quality and Engineering representatives, the non-conformance is submitted to the cognizant government or customer representative for approval.
- 4.1.3.3 Where material is approved using an MRB case, the approved materials is marked with the MRB case control number issued by the MRB clerk. Where material size prohibits this marking, the material is tagged, or otherwise identified using the MRB case control number.

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4.1.4 PMR/NCP

4.1.4.1 Only Quality Assurance, Manufacturing and Procurement personnel are authorized to make PMR/NCP decisions. All PMR/NCP decisions are authorized by Quality Assurance.

4.1.4.1.1 Quality Assurance personnel are employed by B-E as Quality Engineers, Supplier Auditors, or head of Quality.

4.1.4.2 PMR/NCP decisions are authorized by manufacturing personnel for those products manufactured in house, and by purchasing personnel for those products supplied by outside vendors.


4.1.4.2.1 Representatives of Operations and Quality authorized to approve a PMR/NCP decision are approved by Quality and are identified by name in the previously identified listing of the members of the PMR/NCP and MRB.

4.1.4.3 Materials Department is responsible for ensuring that all discrepant materials are accounted for (e.g. purged from stock, WIP) and forwarded to the Inspection Department for verification of conformance to specified requirements. The record of such actions is recorded on QT9/NCP entries.


4.1.4.3.1 In cases where the discrepant item is limited to one article (e.g. a part was dropped), the formal purge process may not be required.

4.1.4.4 Inspection Department is responsible for verifying the condition of the purged materials (e.g. conforming or non-conforming).

4.1.4.5 Completed NCP entries require the oversight of a Quality Engineer to confirm the validity of the rejection, to pursue possible corrective actions: internal (ICAR), or external (NCP response/VCAR), **PRIOR TO FINAL DISPOSITION** being affected (e.g. parts may not be returned to vendor, reworked, scrapped, or otherwise processed until reviewed as described in this paragraph). This oversight review is noted by the Quality Engineer under NCP entry's analysis tab/actions taken.

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- 4.1.4.5.1 This oversight is conducted in a timely manner, as determined by the Inspection Supervisor.
- 4.1.4.5.2 In the event of an NCP not being processed within a timely manner, the Inspection Supervisor notifies the delinquent parties, their immediate supervisor, the Quality Engineer, and the Purchasing Manager, via email.
- 4.1.4.5.3 Where a formal response (NCP response/CAR) is required, tracking will be maintained within the QT9 NCP/CAR systems.
- 4.1.4.6 Detection of additional discrepant items after the closure of the NCP for that discrepant condition may be cause for the issuance of corrective action, per OP 14.1. The issuance of a CAR is at the discretion of the Corrective Action Administrator/ Quality Department.
- 4.1.4.7 The personnel listed in the preceding paragraphs have the authority to make the specified MRB and PMR/NCP decisions, providing they have been approved by the head of Quality, and have been added to the approved MRB listing.
- 4.2 The authority to change the disposition of an NCP/MRB case is limited to the members approved/authorized as listed under QC Form 1408.
 - 4.2.1 Rejection Documents
 - 4.2.1.1 Refer to Q13.001/Q13.002 for additional information on B-E's rejection documents.
- 4.3 All government owned materials to be scrapped require the approval of the cognizant QAR per the requirements of OP 07.2, Government Owned Property Control, prior to any disposal activity.
- 4.4 CUSTOMER NOTIFICATION REGARDING NON-CONFORMING DELIVERED PRODUCT
 - 4.4.1 Breeze-Eastern shall notify a customer when non-conformity is discovered in processes or products, including software products and products containing non-conforming hardware or software, which may affect or impact product(s) already delivered, including any continuing

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airworthiness actions in accordance with the requirements and timeframes specified in OP 14.2, Product Safety and Integrity.

- 4.4.2 Customers may have their own NOE/NOPE procedures. Reference applicable customer sales order quality codes and/or general requirements as applicable.

4.4.2.1 For example Sikorsky “ISeriesWebUI” portal, Boeing Q320, LHD QRS-107, Airbus D&S contact SCQM, Airbus Heli I-com-17-04, Lockheed MFC-CC-001, Bell SQRM-001, DCMA per QAR, etc.


4.4.2.2 Regulatory notifications may also be required if there is a quality escape. For FAA reference AC-0068.

4.5 CUSTOMER APPROVAL OF MRB OR CONCESSIONS

- 4.5.1 In the case where a hardware or software non-conformance is to ship to a customer, the customer is to approve a Concession or MRB prior to shipment, as applicable to their requirements. Software products shipping with a known non-conformance are recorded in the SCI.
- 4.5.2 In the case where a product is to ship to a customer prior to completion of the Qualification process, the customer is to approve a Concession or MRB prior to shipment, as applicable to their requirements.
- 4.5.3 The shipper and C of C associated with these shipments get the concession or MRB number included on the face of the shipper, as applicable to customer requirement(s).
- 4.5.4 For additional information reference OP 13.2 and the relevant Customer Sales Order.

4.6 SUPPLIER ITEMS

- 4.6.1 Suppliers are not authorized to make ‘use-as-is’ or repair dispositions to Breeze-Eastern drawing requirements. Suppliers requesting either of these dispositions are required to submit an MRB request, using form QC-1202, to B-E for review, per OP 06.2.
- 4.6.1.1 FAA PMA items are not eligible for MRB consideration.
- 4.6.2 Suppliers/sub-contractors shall not submit any materials, which are non-conforming without prior written approval by Breeze-Eastern and any government and/or customer approvals as required.

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- 4.6.3 If B-E supplied material is rejected by a supplier, the supplier is required to clearly identify the rejected material using Rejection Tag QC-1071 and to notify the B-E Buyer in writing detailing the PO number, the part number, the quantity accepted and rejected, and the detailed reason for rejection referencing the requirement and the actual condition. The Buyer/Planner is responsible to resolve the logistical details regarding the rejection. When it becomes necessary for the parts to be scrapped or otherwise returned to B-E, the Buyer is to notify the supplier to return the rejected parts on a separate pack slip. The separate pack slip is to include


- The PO number
- The part number
- The quantity accepted and rejected
- The detailed reason for rejection
- The actual requirement
- The discrepant condition

The returned rejected parts are to be accompanied with the above-mentioned information on the supplier's packing slip/CoC. The exterior of the material packaging is to be clearly identifiable as rejected material and marked "Forward to the MRB Crib". Upon receipt at B-E, the supplier-rejected returned material is to be forwarded to the MRB Crib for formal dispositioning per this procedure.

- 4.6.4 B-E flows down corrective action requirements to suppliers when it is determined they are responsible for a non-conformity, as applicable.
- 4.6.5 If a non-conforming item is provided by a distributor, at a minimum, the distributor must notify the manufacturer and take appropriate steps to ensure the non-conforming items do not end up back into the supply chain.

4.7 SOFTWARE

- 4.7.1 Software products, or products containing software, are subject to the requirements of this procedure with regard to the processing of non-conforming product.

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5.0 PROCEDURE:

5.1 Identification of Non-Conforming Material


- 5.1.1 Unless 5.1.2 or 5.1.3 applies, where material is found to deviate or is suspected of deviating from documented requirements, the material is to be identified to preclude unintended use and to indicate the status of the material. Identification is accomplished by the initiation of a Rejection Tag QC Form 1071 and an NCP entry created (See Q13.002). The suspect material is to be moved to the holding area. In the event that the material is too large, the Inspection supervisor is to be notified of the location and informed of the assigned NCP number and a copy of the printed NCP entry.
 - 5.1.1.1 Loss of contractually required material traceability is handled in accordance with the requirements of this procedure.
 - 5.1.1.2 Process non-conformity, which may result in product non-conformity, is treated as a non-conformance until/unless the material is verified to meet the documented requirements.
 - 5.1.1.3 Suspected unapproved parts or counterfeit parts, in addition to being processed per this procedure, also are subject to requirements within the RSM and/or QP-217, as applicable.
- 5.1.2 Notwithstanding the above, an area supervisor may directly transmit known scrap from the area to the MRB Crib by completing a Scrap Ticket, form BE-033, provided the following conditions apply:
 - 5.1.2.1 A machine operator has incorrectly machined parts and knows the parts are scrap.
 - 5.1.2.2 An assembler knows the part is damaged beyond possible use.
 - 5.1.2.3 Are parts with expired shelf life?
 - 5.1.2.4 In such cases, an NCP entry and Rejection Tag Form QC-1071 are not required.
- 5.1.3 Hardware, wedges, wire ends, labels, and other minor items may be scrapped directly to the scrap barrel without the initiation of a Scrap Ticket, form BE-0033. In the case of scrapped labels, they must be mutilated prior to placement in the scrap barrel. The respective planner is notified and replacement items issued to the job.

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- 5.1.4 Operator caused and detected non-conformances which do not involve actual damage, and which are easily corrected by the operator to meet all requirements, may be corrected by the operator at the point of discovery without the formal process as described by this document.
 - 5.1.4.1 The area supervisor is notified of any such actions taken under this section to identify any trends which may require additional action (e.g. corrective action).
 - 5.1.4.2 Vendor related non-conformances, no matter how minor, are handled in accordance with the requirements of this document.
- 5.1.5 Rejected material from Government Owned Property (GOP) processing is as detailed in Figure I.
- 5.1.6 For material rejected in the manufacturing process, a QC-1140 form maybe filled out and sent with the material to Inspection. A copy is supplied to the planner for inventory / material adjustments, as applicable. Alternatively, an NCP entry may be initiated.

5.2 MATERIAL REVIEW CRIB

- 5.2.1 Non-conforming materials are forwarded to the Material Review Crib, where size and weight permit. Non-conforming material, which is too large to be placed in the Material Review Crib, is tagged using QC-1071.
- 5.2.2 The Material Review Crib is locked when unattended. Only those authorized personnel as detailed in this document may be permitted access to the Material Review Crib area. Non-authorized personnel may be permitted access only when escorted by an authorized person.
 - 5.2.2.1 The approved, authorized listing of personnel is posted at the Material Review Crib location. (Ref QC Form 1408).


5.3 MATERIAL REVIEW SYSTEM – PRELIMINARY REVIEW

- 5.3.1 The preliminary review phase is to be initiated by a review of the suspect discrepant material, the Rejection Tag QC-1071, and the NCP entry. The Inspection supervisor, Quality engineer and/ or other supporting personnel, as required, are to complete the preliminary review.
 - 5.3.1.1 When an NCP entry is created, the NCP is automatically assigned with a unique number. The assigned NCP entry is now a Quality

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Record, per OP 16.1. The NCP entry is to be processed to closure, per this procedure. The Inspection supervisor is responsible for the tracking to closure of the assigned NCP entry.


- 5.3.1.2 When a discrepant condition is not verified, an authorized PMR member is to annotate on the NCP entry that there is no discrepant condition and disposition the non-conformance as "Upon further review NOT a nonconformity". The NCP entry can then be approved and closed by MRB clerk or authorized PMR members.
- 5.3.2 The authorized Quality Assurance, Manufacturing Engineering and Purchasing representatives determine the disposition of the non-conforming material(s). The following dispositions are authorized for preliminary material review:
 - 5.3.2.1 Not affecting product (e.g. documentation only)
 - 5.3.2.2 Other (specify under analysis tab)
 - 5.3.2.3 Return to vendor for rework/replacement/credit
 - 5.3.2.4 Rework in-house to meet drawing or specification requirements (requires rework work order)
 - 5.3.2.5 Scrap discrepant part(s)
 - 5.3.2.6 Upon further review, NOT a nonconformity
 - 5.3.2.7 Use-as-is (requires MRB acceptance, ref. OP 13.1)
- 5.3.3 The Quality Engineer and supporting authorized personnel review and disposition the NCP entry for preliminary material disposition. Additional approvals will be obtained from Manufacturing and or Procurement representatives as is warranted.
 - 5.3.3.1 In the absence of authorized personnel, manufacturing supervision may authorize a 'Rework' disposition 'At Risk' provided that authorized personnel concur with the rework on the next business day.
- 5.3.4 The completed NCP entry, along with the discrepant material is processed per the requirements of this procedure.

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- 5.3.5 Non-conformity occurrence(s) can lead to changes to the quality management system (QMS) and / or the environmental management system (EMS), as necessary.

5.4 MATERIAL REVIEW BOARD

- 5.4.1 The Material Review Board is chaired by the head of Quality, or his designee. The MRB is responsible for MRB dispositions. The Board includes the following members:
- 5.4.1.1 Quality Assurance representative
 - 5.4.1.2 Design Engineering representative
- 5.4.2 The following personnel attend, when required, to assist in the MRB process, but are not authorized to make MRB dispositions:
- 5.4.2.1 The Manager of Manufacturing or his/her designee.
 - 5.4.2.2 The Manager of Purchasing or his/her designee
- 5.4.3 When non-conformances are referred to the MRB, the Design Engineering representative classifies the discrepancy as Major or Minor, defined as follows:
- 5.4.3.1 A Major discrepancy is defined as one that affects the functional performance, interchangeability, critical parts, maintainability, weight, form, fit, function, envelope, effective use or operation, appearance (where a factor), health or safety, or provisions of the customers design control specification. Breeze-Eastern **DOES NOT** have the authority to accept a major non-conformance.
 - 5.4.3.1.1 Only approval, in writing from the customer can allow for the acceptance of a non-conformity classified as Major.
 - 5.4.3.2 A minor discrepancy is defined as one that is a violation of contract or configuration documentation, but does not involve any of the factors detailed above.
 - 5.4.3.3 Where customer specified classification requirements exist (e.g. Agusta / LHD classifications Major, Minor Recordable, Minor), those classifications shall be applied as appropriate to the rejection, at the appropriate stage of production

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5.4.4 The Board examines the material to determine if the non-conformance:

5.4.4.1 Can be reworked to meet drawing requirements.

5.4.4.2 Must be scrapped.

5.4.4.3 Can be repaired to an approved Standard or Special Repair Procedure as approved by the MRB, customer and/or government as required by contract. Materials that are FAA PMA items, are not authorized for a repair disposition per OP 21.1 and FAR Part 21.303.

5.4.4.4 Must be returned to the supplier for rework.

5.4.4.5 Recommended for use-as-is (this is not an option for major discrepancies on production material(s)). Materials that are FAA PMA items, are not authorized for a use-as-is disposition per OP 21.1 and FAR Part 21.303.

5.4.4.6 Recommended for use under a waiver / deviation from the principal contracting officer / customer (this is not an option for major discrepancies on production material(s)). Materials that are FAA PMA items, are not authorized for a waiver disposition per OP 21.1 and FAR Part 21.303. Reference OP 13.2 for additional information related to customer approvals of waivers/ concessions.

NOTE: The members of the MRB need not meet concurrently.

5.4.5 Decisions of the MRB are documented on Form QC-1202. It must be signed by Quality Assurance and Engineering representatives. Additional customer and/or government approval may be required, as dictated by contract / regulation. The status of MRB cases is tracked on Form QC-1256.


5.5 PROCESSING DISCREPANT MATERIAL

5.5.1 Discrepant material Processing and Routing

5.5.1.1 Verify the required information is entered on the NCP entry.

5.5.1.2 If the discrepant item is purchased material, a notification of NCP entry is forwarded to the Purchasing Department.

5.5.1.2.1 Purchasing generates the necessary documents to return the discrepant material to the supplier.

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5.5.1.2.2 If the discrepant item came from a distributor, B-E Purchasing is to ensure, at a minimum, that the manufacturer is notified and appropriate steps taken to ensure the non-conforming items do not end up back into the supply chain. A formal NCP response or a VCAR (reference OP 14.1), may be utilized to provide additional information and record actions taken.

5.5.1.3 Quality Engineering is to review the circumstances regarding the discrepant condition and initiate a NCP response or a Corrective Action, Internal or Supplier, per the requirements of OP 14.1, when deemed as warranted by the Quality Engineer.

5.6 REWORK TO BLUEPRINT DISPOSITION

5.6.1 Material dispositioned as 'rework' is forwarded to the department responsible for performing the rework activity by using the instructions provided on one of the following documents, based on the nature of the rework:

5.6.1.1 NCP entry

5.6.1.2 Annotated routing list

5.6.1.3 Rework routing list

5.6.2 Upon completion of the rework, the reworked material(s) are re-inspected/tested for those characteristics.


5.6.3 Should the rework be found unacceptable, an additional NCP entry is initiated and the material is re-submitted for a new review and disposition.

5.6.4 Where the rework is found to be acceptable, the material(s) is processed in accordance with the routing list instructions.


5.7 SCRAP DISPOSITION – NON-GOVERNMENT PARTS

5.7.1 When discrepant material is dispositioned as scrap, the MRB clerk initiates and completes a Scrap ticket (form BE-033).

5.7.2 Scrapped material(s) is kept positively controlled until it has been rendered physically useless as to its original purpose. Additional contractual requirements for the control and mutilation of scrap may be imposed by contract.

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- 5.7.2.1 Mutilation of scrapped materials is carried out in such a manner as to ensure that the materials have been rendered physically useless as to its intended usage. Mutilation may be performed in-house per section 5.7.2.2 or off-site per section 5.7.3.
- 5.7.2.2 This can be accomplished using a variety of methods, but is most commonly performed by:
 - 5.7.2.2.1 Deforming or defacing the materials (typically using hand tools or cutters) so as to render the materials useless.
 - 5.7.2.2.2 Where the size of any materials precludes hand mutilation, contact Quality Engineering for guidance.
- 5.7.3 Where scrap is to be mutilated off-site, a Quality Department representative arranges for the mutilation activity. Off-site mutilation or disposal is by a supplier/facility approved by Quality, who must supply written certification (signed by the supplier's General Manager or Quality Manager) of the complete destruction of the scrapped material(s) (including nameplates and/or ID tags), or that it has been otherwise rendered unusable.
 - 5.7.3.1 Quality Department maintains records of these off-site mutilations per the requirements of OP 16.1.
- 5.7.4 Scrap is periodically removed from the Material Review Crib or secure area and placed in sealed containers marked 'Scrap' for disposal. The containers are sealed prior to being removed from the secured area. Large or bulky scrap materials may be moved by cart or forklift without having been sealed, but be moved under the supervision of a representative of Quality Assurance, until the materials have been secured or received by the vendor performing the mutilation activity.
- 5.7.5 Spare Parts Returned for Warranty Consideration
 - 5.7.5.1 Parts that have had the reason for rejection verified (warranty accepted) and are to be replaced to the customer may be scrapped directly by Inspection after consideration being given as to the possibility of returning the defective parts to the original supplier.

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5.7.5.2 For items being returned to the responsible supplier, an NCP entry is used. For items being scrapped, the following apply.


5.7.6 For Non-Government or FAA controlled Overhaul and Repair items being scrapped they are scrapped directly using O&R Scrap Report M-122 e.g. returned cables or discrepant parts identified as a result of a repair. The mutilation process, as previously defined, applies.

5.8 SCRAP TICKET TRANSACTION PROCESSING PROCEDURE

- 5.8.1 The Scrap Ticket (ST), form BE-033, is completed by appropriate personnel and is processed by Inspection.
- 5.8.2 Upon processing of the ST, Inspection delivers the Material copy, the Planning copy and the Production copy to the Planning Supervisor and holds the Inspection copy until the Material copy is returned initialed.
- 5.8.3 The Planning Supervisor distributes the Planning copy to the appropriate Planner for the completion of the scrap transaction in the computer system.
- 5.8.4 The Planners complete the transaction and, if applicable, mark up Planning, Production and Material copies with any corrections such as component scrap vs. work order scrap, incorrect part numbers or incorrect Work order numbers, etc.
- 5.8.5 The Planner who completes the transaction will initial and date the bottom corner of all copies and may keep the Production copy for their records.
- 5.8.6 The transacted copies will be split and the Planners copy is placed in the Accounting bin and the Material copy is returned to Inspection.
- 5.8.7 Accounting will pick up at some interval transacted Planning copies of the scrap ticket.
- 5.8.8 Accounting will check scrap tickets with the transactions in IFS and will contact the Planning Supervisor to rectify discrepancies.
- 5.8.9 Inspection will collect their transacted copy and file this as the final version.

5.9 SCRAP DISPOSITION – GOVERNMENT OWNED PARTS

- 5.9.1 Government owned materials, which are dispositioned as scrap are identified, recorded and positively controlled in a secured area prior to

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submittal for disposal approval and processed in accordance with the requirements of OP 07.2, Government Owned Property Control.

- 5.9.2 The MRB clerk documents all materials which are government owned that have been dispositioned for scrap. This listing is forwarded to the Inspection Department supervisor, who communicates the list to the resident DCMAO office at B-E, at a minimum, weekly, on Form QC-1300.

5.9.2.1 The weekly communication, as described above also includes, at a minimum, the Government Property Administrator, the head of Quality, the Director, Operations and the Quality Assurance scrap coordinator.

5.9.2.2 No government owned property is scrapped without the prior approval of a cognizant government QAR.

- 5.9.3 Upon approval for scrapping, the method for the scrapping of government owned property is per the requirements previously defined for mutilation.

5.10 CUSTOMER OWNED PROPERTY

- 5.10.1 Customer owned materials, which are dispositioned as scrap, are identified, recorded and positively controlled in a secured area prior to submittal for disposal approval.


- 5.10.2 The MRB clerk documents all materials which are customer owned that have been proposed for disposition as scrap.

- 5.10.3 O&R Business Unit Manager or Account Manager communicates with the customer through the appropriate contract coordinator the specifics of the non-conformance and request a disposition. The customer disposition is communicated to the MRB clerk.

- 5.10.4 Upon approval for scrapping, the method for the scrapping of customer owned property is per the requirements of this document – SCRAP DISPOSITION – NON-GOVERNMENT PARTS.

5.11 USE-AS-IS DISPOSITION

- 5.11.1 Recommendations for a use-as-is disposition are only made by the MRB. The use-as-is disposition is not utilized without formal acceptance by a government or customer representative, where required by contract or

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regulation. The MRB keeps the customer / government informed of its investigations and deliberations to assure timely approvals.

5.11.1.1 Reference OP 13.2 for additional information related to customer approvals of waivers/ concessions.

5.11.2 Materials awaiting government or customer approval for a use-as-is disposition are stored in the Material Review Crib until such time as the approval/disapproval is received.

5.11.3 Where the disposition of use-as-is restricts the use of the material(s) for specific contracts, and the material is to be placed into stock, the MRB Accepted Material Control form QC-1222 accompanies the material into stock with a copy being retained with the MRB records.

5.11.4 B-E does not disposition product or material as 're-grade', as defined in section 3.

5.11.5 MRB use-as-is disposition requires the generation of a Corrective Action Request (CAR), per the requirements of OP 14.1, or inclusion of the Corrective Action response on the QC-1202 form.

5.11.6 Materials that are FAA PMA items are not authorized for a use-as-is disposition per OP 21.1 and FAR Part 21.303.


5.11.7 Non-conforming software products or products containing non-conforming software require customer approval prior to shipment.

5.11.8 Software products or products containing software products, which are required to ship prior to completion of the Qualification process, require customer approval prior to shipment per the requirements of this procedure.

5.12 REPAIR DISPOSITION

5.12.1 Materials that are FAA PMA items are not authorized for a repair disposition per OP 21.1 and FAR Part 21.303

5.12.2 Disposition of non-conforming materials is made by Preliminary Review, or through the MRB. Standard repairs previously approved by the government or customer are dispositioned by the Preliminary Review Board or the MRB. Any other proposed repairs are by means of a Special

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Repair Procedure and be submitted for review and approval by the government or customer, where required by contract.

- 5.12.3 Following the re-inspection, the material, repair procedure, and NCP entry is held for government and/or customer acceptance, where required by contract.
- 5.12.4 Following the completion of the repair activity, the non-conforming material(s) is re-inspected for the discrepant condition, per documented procedural requirements.
- 5.12.5 MRB Repair disposition requires the generation of a Corrective Action Request (CAR), per the requirements of OP 14.1. The corrective actions may be defined on the MRB Form QC – 1202, which will satisfy this requirement.

5.13 Records, Audits, & Training

- 5.13.1 Records/ Documented information/ Applicable records/ documented information of non-conformities (nature of and any subsequent action taken), are retained per OP 16.1.
- 5.13.2 The Control of Non-conforming Materials and Processes is subject to audit per OP 17.1 Compliance Evaluation Audits.
- 5.13.3 Training is provided for those persons involved in the Control of Non-conforming Materials Process per the requirements of OP 18.1 Training Program.

6.0 REVISION HISTORY:


<i>REV</i>	<i>Release Date</i>	<i>AUTHOR</i>	<i>DESCRIPTION OF CHANGE(S)</i>
J	3/2/2005	F. Willms	Added mfg. supervision rework option at risk in absence of authorized personnel to 6.1.3. Para. 4.0 revised 1 st sentence, added new para. 4.2. Old para. 4.2 is now 4.3. 7.4.1 reference added to para. 4.2
K	6/10/2005	F. Willms	Added clarification for interruption of processes.
L	8/10/2005	F. Willms	Added para 4.4 Clarified 7.4.2 – 7.4.5
M	5/18/2006	C. Blanton	3.2 Added stock and WIP purge process and responsibility for purges with other minor changes to support purge process
N	10/10/2006	C. Blanton	Complete re-write to bring into conformance with new formatting requirements. As complete re-write, no revision bars used.

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O	10/12/2006	C. Blanton	Added para. 3.11, 3.12, 3.17, 3.18, 3.19, 3.20; added verbiage in para. 4.3.3, case control no.; added verbiage in para. 4.4.5, ICAR; corrected form notation in para. 5.1.1; changed verbiage in 5.2.1, 5.7.4, Material review crib; changed verbiage in para. 5.4.3.2 violation; added verbiage in para. 5.8.2.1, at a minimum; added verbiage in para. 5.9.4, reference to para. 3.17; added verbiage to para. 5.8.2, form QC-1300.
P	2/19/2007	F. Willms	Removed 4.5 O&R scrap and renumbered remaining para. Added 5.75 Spare Parts Returned for Warranty Consideration. Added 5.7.6 For non-Government or FAA controlled Overhaul and Repair items being scrapped. Revised para. 4.4.5 for IR oversight, added 4.4.5.1 & 4.4.5.2 for requirements, removed Machine Shop Superintendent from para. 4.4.2.1
R	9/12/2007	C. Blanton	Added para. 4.4.5.3, 5.4.3.1.1, 5.4.3.3; added form, fit, function, critical parts to para. 5.4.3.1
S	7/8/2009	N. Harris	Added ref. to OP 07.2 Government Owned Property Control in 5.9, added 5.10 Customer Owned Property for OP 07.1. Added 5.13 MRB Records, 5.14 Audits, 5.15 Training, 4.9, 5.10.3, 5.10.4, Software. Added exclusion of repair, use-as-is and waiver to 5.4.4.3, 5.4.4.5, 5.4.4.6, 5.10.3, 5.11.1 for FAA items. Added 5.1.3 to allow direct scrap of hardware, labels and misc. items directly to scrap bin. Added 5.8 Scrap Ticket Transaction Processing.
T	7/30/2010	N. Harris	Update to incorporate changes per CAR 1917, form QC-1298, Rev. G and Title changes for departments. V.P., Quality Assurance replaced by V.P. Quality Improvement & Completeness, V.P. Engineering replaced by V.P. Product engineering & Program Management (no rev. bars used). Para. 5.7.2 removed "Painted red and". Para. 5.7.2.1 Added "Mutilation may be performed in-house per section 5.7.2.2 or off-site per section 5.7.3.
U	8/17/2010	Lew Babbitt	Elimination of paragraph 4.5, page 7, which reads as follows: Scrap materials, as defined in paragraph 5.7 are permitted to be utilized as machine setup and shop aids during the manufacturing process. Where the initial scrap identification is removed during usage, the material shall be re-identified using the reject stamp ('D')
V	9/12/2012	Lew Babbitt	Paragraph 5.7, sub-paragraph 5.7.2: Remove "(see Government Scrap, Para. 5.8 below)"
W	12/18/2012	N. Harris	Delete the following paragraphs: 4.4.2.1-Manufacturing personnel shall be employed by Breeze-Eastern as Production Manager, Production Engineering Manager, or (Senior) Vice President, Operations. 4.4.2.2 Procurement personnel shall be employed by Breeze-Eastern as Purchasing Manager, Director of Purchasing, Director of Materials or Vice President, Operations. Add: 4.4.2.1 Representatives of Operations and Quality authorized to approve a PMR decision are approved by Quality and are identified by name in the previously identified listing of the members of the PMR and MRB.
X	11/6/2013	N. Harris	Updated to current format. 3.1.9 Added references to OP 21.1, Special Requirements for FAA – PMA Products, 3.2.2, BE OP008, 3.4.4, IR, 3.4.6,

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			O & R, 3.4.7, PMA, 3.4.11, St, 3.4.12, SCI, 3.4.14, WIP, 4.1.1, FAA PAR Part 21.303. Incorporated DCNs 10-10QA, 12-19QA, 12-22QA. 4.2.1 was rewritten to allow restart of testing for normal failures identified during testing unless a question exists as to the appropriate actions to be taken. Added requirements to satisfy CAR 2953. 4.7, 4.9 updated to both hardware and software, 4.9.1.3 to require MRB or concession number on face of shipper. Added reference to OP 21.1 to 5.4.4.3, 5.4.4.5, 5.4.4.6. 5.6.3, 5.11.6, 5.12.1. Added the resubmittal for a new review and disposition for rework found to be unacceptable. 5.7.3.1, removed specific time and referred to OP 16.1 for record retention periods. 5.7.6 Changed from paragraph number reference to topic reference. 5.9.2.1, updated title for QA Director. 5.9.3, updated to previously defined mutilation requirement, deleted reference to paragraph number. 5.13, Updated to note that corrective actions may be defined on the MRB Form QC – 1202. Figure 1. Updated Scrap Parts Mutilation Options reference from 7.4 to 5.7.
Y	8/5/2014	N. Harris	Added para. 3.2.12 Form QC 1408 MRB Member Posting Form Added para. 4.2.2.2 to identify personnel authorized for PMR & MRB action, (DCN 14-12QA).
Z	9/24/2015	F. Willms	Incorporated DCN 14-12QA. Added OP 06.2 to Sec. 3.0, para. 3.1.1 and changed 3.1.2 and 3.1.3 to reflect correct titles of Procedures; removed reference to Q10.003 from 3.1.10, Sect. 3.0. Corrected title of ref. doc. OP 7.2 in Sec. 4.3. Included ref. to OP 06.2 in 4.8.1. Added sentence end of 4.8.1; added 4.8.3 to address B-E supplied material rejected at a supplier. Modified 5.1.1 to identify the use of an unnumbered form BF-1064. 5.2.1 removed “with the inspection report to be delivered to the MRB clerk. 5.3.1 removed “and submitting for material review” and added “The inspection supervisor, Quality Engineer and/ or other supporting personnel as required, are to complete the preliminary review.” Added 5.3.1.1 and 5.3.1.2 to define the closure of the Form BF-1064 when a discrepancy is verified and when it is not verified. R.3.3., changed first sentence from “Quality Assurance Representative” to “Quality engineer and supporting authorized personnel” Removed “shall” in Section 4. Deleted “shall” from first sentence of 5.11.5 and added “or inclusion of the Corrective Action response on the QC-1202 form” at end.
AA	3/22/2017	F. Willms	Incorporated DCN 17-06QA changes to 5.1.1. to streamline process, and enhance neatness and legibility.
AB	4/12/2017	F. Willms	DCN 17-07QA Updates to para. 5.8.2, 5.8.3, 5.8.4, 5.8.5, and 5.8.6. to maintain control of Inspection Scrap Ticket Form BE-033 within Inspection Department
AC	11/10/2017	L. Novak	DCN 17-30QA Updates to Sec. 2.3 and 5.13; and addition of para. 3.4.15, 4.1.2, 4.8.4, and 5.3.5 in preparation of transition to new AS9100D and ISO14001:2015 Standard.

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AD	4/23/2018	L. Novak	Updates include the incorporation of DCNs 17-06QA, 17-07QA, 17-30QA, minor grammatical and personnel title changes. Transitioned contents to current procedural format (Rev. P) of QC-1298. In 5.1.6 added QC-1140, removed BE_OP008.
AE	05/23/18	A. Moss	DCN 18-18QA to corrected minor typos as follows: changed “slated” to “stated” in sec. 3.4.15; and replaced the word “with” with “without”
AF	7/9/2019	L. Novak	DCN 19-10QA created to add new sections 2.1.1, 3.1.12, & 4.7.4; added “reference OP 13.2 for additional information related to customer approvals of waivers/ concessions” as the last sentence in sec. 5.4.4.6 and 5.11.1
AG	8/28/2019	L. Novak	DCN 19-12QA created to add new sections 4.8.5 and 5.5.1.2.2.
AH	4/13/2020	L. Novak	DCN 20-05QA to add the following new sections: 2.4, 3.3.2, 5.3.4.1, & 5.13.1.1
AJ	4/17/2020	L. Novak	Updated entire document to incorporate changes effected by DCNs 18-18QA, 19-10QA, 19-12Q, and 20-05QA; made minor formatting corrections. Moved AS9100D & ISO14001:2015 from 4.1 to 3.3. Moved 4.9 into 4.4, renumbered to 4.3; moved 4.6 to 4.5 & renumbered. Added counterfeit parts prevention in 3.1.13 & 5.1.1.3.
AK	2/7/2023	B. Fung	Updated to reflect current procedure template QC Form 1298 Rev. R. Obsoleted previous “Inspection Report” system, implemented new QT9 QMS Software. See changes in section 1.2, 2.0, 3.0,4.0 and 5.0 indicated with Change Bars.
AL	1/9/2025	L. Novak	Ref CAR3894 (added FAR Part 21.137 – Quality System in 2.4, added 3.2.3, added 4.4.2 for NOE/NOPE customer references, etc.); moved “software from 4.4 to 4.7.

* A revision's release date is to be filled in the above revision history table and document header once approved; to be the same as from top of page 1/ just under header.


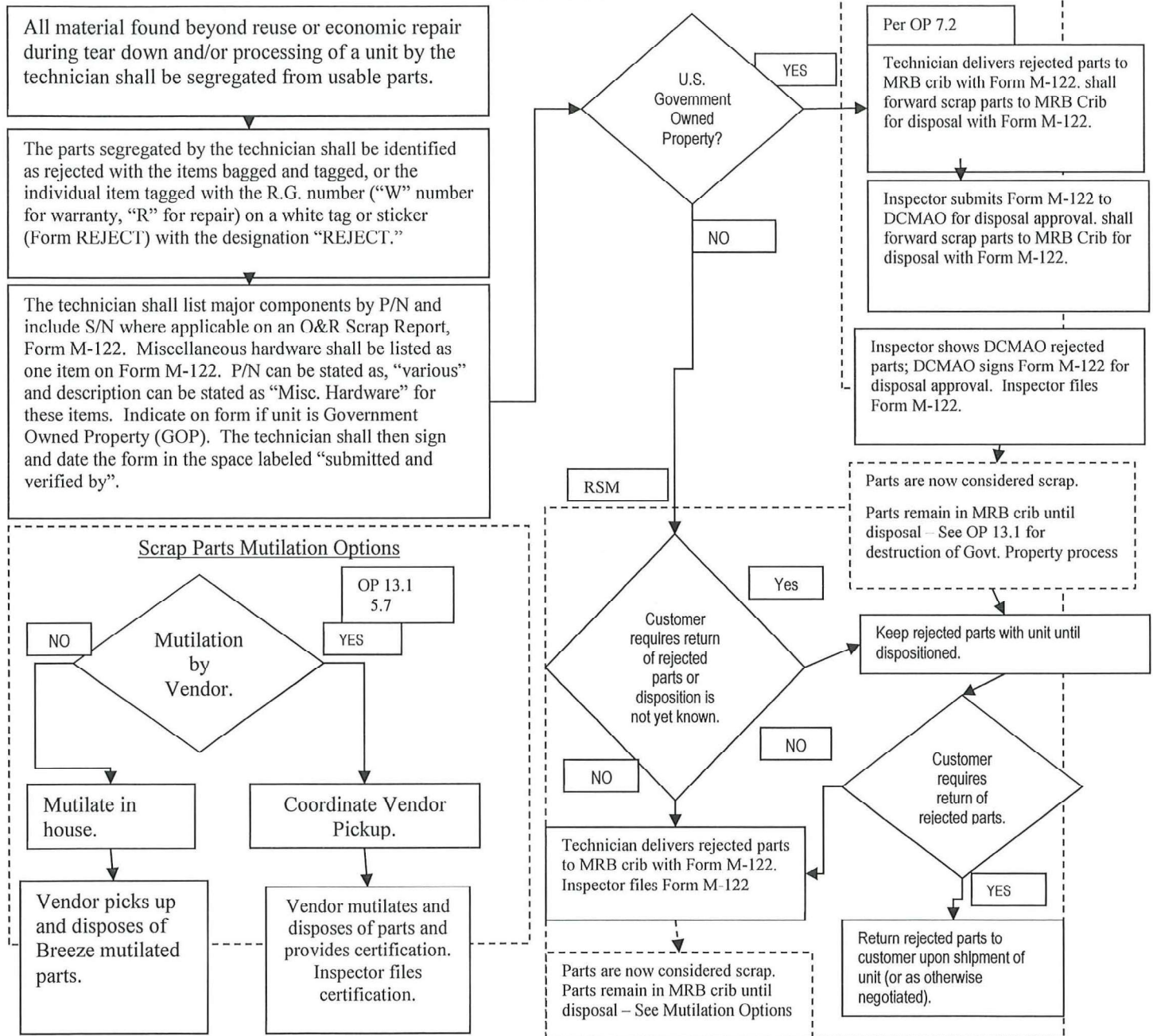
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FIGURE 1



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Request For Document Action

Doc. Name: Control of Non-Conforming Materials and Processes
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 Doc. Code: 02-Q-Level II-01
 Publish Date: 1/9/2025

Document Info

Doc. #: 1 Doc. Code: 02-Q-Level II-01 Doc. Ref: OP 13.1
 Document Name: Control of Non-Conforming Materials and Processes
 Doc Description: This procedure establishes the system for identification, control, and disposition of non-conforming material and processes.
 Document Type: Operating Procedure Department: Quality
 Document Owner: Lars Novak Document Category:

Revision Info

Requestor: Lars Novak Resp. Party: Lars Novak Status: Active
 Previous Revision: AK Current Revision: AL Document Location: QT9
 Document Author: Physical Location: B-E intranet / Quality Dept. archives.

Description of change to document

☐ Training Required

Ref CAR3894 (added FAR Part 21.137 – Quality System in 2.4, added 3.2.3, added 4.4.2 for NOE/NOPE customer references, etc.); moved "software from 4.4 to 4.7.

Comments

Entry Date	Author	Entry
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Collaboration

Collab User	Status	Date Completed	Notes
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Affected Departments

Dept Code	Department	Inactive
E	Engineering	<input type="checkbox"/>
I	Inspection	<input type="checkbox"/>
M	Materials	<input type="checkbox"/>
O	Operations	<input type="checkbox"/>
P	Purchasing	<input type="checkbox"/>
Q	Quality	<input type="checkbox"/>

Approvals

Approvers

Request For Document Action

Doc. Name: Control of Non-Conforming Materials and Processes

Doc. #: 1

Doc. Code: 02-Q-Level II-01

Publish Date: 1/9/2025

B-E LLC

Approver	Approved	Date Approved
Alan Moss	<input checked="" type="checkbox"/>	12/24/2024
Gary Embley	<input checked="" type="checkbox"/>	12/23/2024
Jim Fett	<input checked="" type="checkbox"/>	12/24/2024
Krause, Bryan	<input checked="" type="checkbox"/>	1/7/2025
Rich Doherty	<input checked="" type="checkbox"/>	1/7/2025
Scott Fawcett	<input checked="" type="checkbox"/>	1/6/2025
Lars Novak	<input checked="" type="checkbox"/>	12/30/2024

Approval Notes

Entry Date	Author	Entry
January 09, 2025 09:08:40 AM -04:00	Lars Novak	Approved from new document queue
January 07, 2025 09:36:36 AM -04:00	Krause, Bryan	Document Approved With the following notes:
January 07, 2025 07:50:02 AM -04:00	Rich Doherty	Document Approved With the following notes:
January 06, 2025 02:26:47 PM -04:00	Scott Fawcett	Document Approved With the following notes: Approved
December 30, 2024 10:11:33 AM -04:00	Lars Novak	Document Approved With the following notes:
December 24, 2024 10:00:52 AM -04:00	Alan Moss	Document Approved With the following notes:
December 24, 2024 09:31:46 AM -04:00	Jim Fett	Document Approved With the following notes: Train on updates once approved
December 23, 2024 08:35:32 AM -04:00	Gary Embley	Document Approved With the following notes:

User Defined Fields

Affected Products

Product Name	Part Number	Description	Inactive
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