Welcome to the third issue of this Nadcap newsletter. The content has been designed in particular for companies that are not normally able to send a representative to Nadcap meetings to gain technical information/knowledge that will help them better prepare for a Nadcap audit and understand how to utilize Nadcap effectively to improve their performance.

Each newsletter will include articles designed for the whole Nadcap Supplier community. In this issue, there are articles about audit report processing with a review of OP 1106, the operating procedure that governs that process and a detailed overview of root cause corrective action - Nadcap style.

Also highlighted is the Supplier Tool Sheet that the Nadcap Supplier Support Committee created to help Suppliers more easily find information about Nadcap online. Please take a look and let us know if you have any suggestions to improve this document.

In addition to general Nadcap articles, each newsletter will have a particular technical focus. In this issue, there is detailed information regarding Nadcap chemical processing audits. Almost 1,000 Nadcap chemical processing audits are conducted annually, yet we know that many people are not able to attend Nadcap meetings and benefit from free training and other information shared there.

I hope you find the content valuable. Please let us know how we can continue to make this a useful tool to help you in your Nadcap audit journey.

Joseph G. Pinto
Executive Vice President & Chief Operating Officer
Performance Review Institute

Overview of Root Cause Corrective Action - Nadcap Style (Part One)

Root Cause identification for findings has long been a requirement for those working in industries with critical processes. It is a process of determining the causes that led to a nonconformance or event, in order to implement corrective actions to prevent a recurrence of the event.

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RCCA NADCAP STYLE

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Following the Nadcap system, once the problem has been defined and causes and impacts analyzed, accreditation requires clear and concise descriptions of actions taken to fully and completely address non-conformances identified during the audit. This two-part article presents the Nadcap approach to investigating and responding to nonconformances identified during Nadcap audits.

Containment Action

Containment action is taken immediately after you become aware of the event to stop it from occurring and preventing or minimizing any impact from the event. You contain the problem and the effects prior to beginning corrective action. While these actions may be called specific corrective action, please note that there are no actions here to correct the problem, they are just damage control:

- Put out the fire: Stop the event from occurring.
- Assess the damage: Determine what and how much damage has been done.
- Contain all effects: Prevent everything that was effected from escaping, and determine if anything has escaped.
- Notify as appropriate: If it is determined that product may have escaped, notify any impacted customers.

These steps are the actions taken to bring the nonconformance into compliance. This is the immediate corrective action constituting the information to be supplied in the Immediate Corrective Action section. Each of these steps should be described in detail. Advise exactly what steps you took to stop the event from occurring, what was the impact and how you determined this. Describe in detail the steps you took to contain any effects (while we are critically concerned with hardware, effects may go beyond product). If product has, or may have, been shipped to a customer, advise who and how you notified customers.

Problem Definition

Corrective action begins with clearly defining the actual problem. While this may seem simple, many repetitive non-conformances result because the wrong problem was solved, only the outcome was fixed, or only one problem was corrected when there were really two or more problems. The steps involved in problem definition are forming the team, identifying the problem and gathering and verifying data.

Forming the Team

Assigning the wrong personnel to corrective action projects is a common problem. Many times, the projects are assigned to Quality, when Quality did not make the error, or it may be assigned to employees in charge of the area where the problem or nonconformance was discovered when the nonconformance resulted from a systemic problem that goes far beyond the area where the nonconformance was discovered.

A team of stakeholders in the problem should be assembled. Who owns the problem? Who has a stake in the outcome and the solution to the problem? Who are the vested owners of both the problem and the solution? These are the people who know the process, have the data and experience, and they are the ones that will have to implement the corrective actions. Without the full support of the stakeholders, long-term solutions are not likely.

Stakeholders and qualified members may change as the team gains more information and data. Clarifying the problem or additional problems may surface involving additional stakeholders or require additional expertise.
As the process evolves, continue to assure that your team includes stakeholders and necessary experts and resources.

**Identifying the Problem(s)**

In order to fix a problem, it must be clearly and appropriately defined. Frequently, the non-conformance identified is not really the problem, but the symptom of the problem. If you have an expired gage, that is a symptom of a problem with your recall system. A flow-down problem is generally a contract review or quality planning issue. Asking questions similar to the following will help you to address the actual problem and not just the symptom that was identified as the event.

- What is the scope of the problem?
- How many problems is it?
- What is affected by the problem?
- What is the impact on the company?
- How often does the problem occur?

Addressing these types of questions will assist you in clarifying and defining the problem(s). “If you cannot say it simply, you do not understand the problem.” Once the problem is defined, it must be clearly stated in simple terms. While some problems might be “the unique, inherent metallurgical properties”, you aren’t going to be able to fix that, but certainly there is some process variability that contributed to this and can be fixed. Do not allow yourself to hide behind the technical, state-of-the-art nature of the industry. Very few problems are actually technical or high-tech.

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Gather and Verify Data

When the problem is identified, it is time to begin data collection. The factual information and data necessary to assure a thorough cause analysis needs to be collected. Data may have to be collected several times during this process, but the preliminary collection phase occurs now and will guide the analysis process.

Types of data to collect:
- Location - the site, building, department, or field location where the event took place
- Names of Personnel - operations personnel, visitors, contractors
- Date and Time
- Specifications - what are the requirements?
- Operational Conditions - start up, shutdown, normal operations
- Environmental Conditions - noise levels, visual distractions, lighting, temperature, etc.
- Communications - verbal or written, what orders were being followed?
- Sequence of Events - in what order did things take place?
- Equipment - what was being operated?
- Physical Evidence - damaged equipment or parts, medical reports
- Recent Changes - in personnel, equipment or procedures
- Training - classroom, on-the-job, none
- Other Events - have there been similar occurrences?

Analysis

When the problem is identified, and preliminary data has been gathered and verified, the analysis can begin. A “5-Why” process works well, but analysis may take other forms. The answers to the “Why” questions form a chain of causes leading to the root cause. The answer to the first Why is the direct cause. The logical end of each chain is a root cause (each chain will have its own root) and the causes in between the direct cause and the root cause are contributing causes. There may be no contributing causes, but there is always a root cause – the best and logical place to stop as identified by the team. This place is where continuing to ask Why adds no value to prevention of recurrence, variability reduction, or cost savings. There may be multiple branches and multiple root causes (each branch having its own root cause). Each branch should be analyzed and worked down to its’ logical end. Many of these identified causes, may not directly relate to the problem, but point to issues that still need to be addressed to prevent future problems. Some formal method of prioritizing causes will need to be developed to aid in determining when an identified cause should be worked, as a large number of causes will be generated and not all are worthy of much investment to fix.

Impact

You should now re-examine your impact statement. While the impact and effects of the event were addressed as part of your immediate corrective (or containment action), you have now identified numerous causes that may also have impacted your products or processes. Consider the effects that the entire cause chain has had and be certain that they get addressed. If necessary, readdress the Impact statement. Be certain that this statement addresses:
- Scope of non-conformance – limited to 1 part or 1 lot, or was it systemic and what specific parts were affected
- Description of what was done to review similar product to confirm or reject the possibility of a systemic problem
- Evidence of customer notification and response
- Disposition of any nonconforming parts

The next issue of the Nadcap Newsletter will present part two of this article, addressing the second part of the flow chart on page 3.
NADCAP CHEMICAL PROCESSING AUDIT INSIGHT

The Nadcap Chemical Processing Task Group was established in 1990 and as of the February 2016 Nadcap meeting, Mike Stolze of Northrop Grumman became the Chairperson and Mike Coleman of Boeing became the Vice Chair. Within the Task Group, there are nearly 100 industry representatives - 46 Nadcap subscribers and 51 suppliers who actively participate in the technical discussions and decision making.

Much of this activity takes place at the Nadcap meetings that are held three times per year. But the Task Group recognizes that not all industry stakeholders are able to participate and benefit from the opportunities that the meetings represent, such as learning, debating and networking.

Consequently, this article is intended to assist to some degree, by providing insights and sharing lessons learned regarding the Nadcap chemical processing audit experience.

The Nadcap Chemical Processing Task Group conducts audits to the following audit criteria:

- AC7108: General Process
- AC7108/1: Paint / Dry Film Coatings
- AC7108/2: Etch Inspection Processes
- AC7108/3: Preparation prior to Metal Bond
- AC7108/4: Sub-Contract Laboratories
- AC7108/5: Chemical Milling
- AC7108/6: Cleanliness Verification
- AC7108/7: Vacuum Cadmium & Aluminum IVD
- AC7108/15: Pre-Penetrant Etch

The checklists listed above contain “Compliance Assessment Guidance”, or CAG, where clarification is necessary to confirm the requirement of the Task Group. For example, there is one question in AC7108 which asks:

“Is there documentation which provides for tracking and accountability of all test pieces currently in work (processing and testing)?”

Directly underneath the question is the CAG, which clarifies:

“A router should be with every test piece describing the process and all of the variables to make sure that it is representative of the part.”

The audit checklists are available on eAuditNet under Resources - Documents - Audit Checklists and, as with any Nadcap audit, you should download and review them in detail in advance of the actual Nadcap audit as part of your pre-audit preparation.

It should be noted that the Chemical Processing Task Group recently revised the structure of their checklists. Rather than covering the majority of technologies in the core (AC 7108) document, individual slash sheets have been developed by moving applicable questions into them. This was done to provide greater clarity to all users. There were no technical changes. A formal announcement will be issued prior to March 5, 2016 notifying affected parties of the change. These checklists will be used on audits starting on or after June 5, 2016. Note: Commodities that share the AC7108/1 (Paint and Dry Film Lubricant Application) checklist will see the inclusion of requirements for ovens used to cure the paints.

In addition, the Chemical Processing Task Group maintains an audit handbook in eAuditNet that has been developed to assist both Nadcap auditors and Suppliers as follows:

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- Where necessary, provide clarification on the intent and rationale of the Chemical Processing Task Group as it pertains to specific questions contained in AC7108
- Clarify the material to be reviewed in addressing audit questions
- Standardize the audit from Auditor to Auditor
- Provide general guidance on Task Group expectations as to the Supplier’s preparation for an audit and on an auditor’s execution of the audit

This handbook is located in eAuditNet under Resources - Documents - Public Documents - Chemical Processing - Audit Information.

AC7108 requires that suppliers complete a self-audit using the applicable checklists in preparation for the Nadcap audit. All internally identified non-conformances should be corrected prior to the Nadcap audit.

The best way to prepare for a Nadcap audit is to create a timeline and schedule the required preparatory tasks at appropriate points prior to the audit (see issue one of this newsletter for details on the suggested timeline). During your pre-audit preparation, utilize the CAG and audit handbook to assist in your understanding of the intent or meaning of the checklist questions. If you are still unsure, however, please contact a PRI Staff Engineer for clarification; this will help you to minimize the risk of misinterpretation.

As well as the audit checklists and audit handbook, the Chemical Processing Task Group maintains many other useful documents in eAuditNet to assist Suppliers in their pre- and post-audit activities. For example, the Nadcap Chemical Processing Task Group publishes the most common non-conformances identified to the AC7108 checklist.

This information is shared in order to assist suppliers in their audit preparation. By publicising this data, the hope is to improve audit performance through a lessons learned approach.

Process and Quality Planning

The most common non-conformance written against AC7108 is related to paragraph 3.4.1, which asks the supplier to confirm that there is a procedure which defines system/requirements for process and quality planning, which effectively ensures compliance with customer and/or specification requirements.

Where non-conformances are written against this paragraph, it is because suppliers are not correctly flowing down contract/specific requirements for the processes you perform, and that the requirements and the practice is documented.

Compliance

The second most common non-conformance relates to 6.n.2.2, 6.n.3.9 through 6.n.3.13 (where n = job audit number). The question asks whether all processing, testing and inspection conform to the requirements.

Non-conformances written against this question are typically due to a lack of, or incorrect, flow down or because the operators or inspectors are not working to defined instructions.

The solution to this is the same as for the most common non-conformance: understanding, implementation and records are required to demonstrate to the Nadcap auditor that your company is compliant to this requirement.

Calibration of Process and Testing Equipment

Section 3.10 of AC7108 relates to the calibration of process and testing equipment. The Nadcap auditor needs to see evidence of current calibration on all shop
equipment used to set, control or monitor the control of a process, and evidence of current calibration on all test and inspection equipment used to accept product or control of a process.

Non-conformances are typically written due to lack of compliance with the first requirement; for evidence of current calibration on all shop equipment used to set, control or monitor the control of a process. Usually, this is because timers used for monitoring immersion times and paint mixing times and also the time axis of ramp rate controllers in anodizing are not properly calibrated or are out of calibration.

Where the auditor observes one piece of equipment, such as a timer, out of calibration, he/she will want to verify whether this is an isolated incident, or whether it is systemic. Isolated lapses may be considered as minor non-conformances where systemic lapses could be seen as major non-conformances, because they imply an ineffective quality management system.

However, NCRs are also written against the second requirement, regarding current calibration on all test and inspection equipment used to accept product or control of a process. The main cause of non-conformances written to this question is the roller used in paint adhesion testing and the thickness standards used to verify the thickness test instrument.

Period, Lot Testing and Solution Analysis

The next most common non-conformance is found in the section of the checklist related to periodic, lot testing and solution analysis. Paragraph 4.1.3 asks whether the periodic and lot acceptance testing reviewed in the audit are in compliance with customer and/or specification requirements, including Nadcap Table 1 (Appendix G).

Table 1 defines the default frequency for period testing. It can be found in AC7108 Appendix G. It was written to define the default periodic test frequencies adopted by the Nadcap Chemical Processing Task Group for periodic tests where the specification requires a test but does not define the frequency.

Other test requirements such as number of samples, size of samples, test parameters etc. are expected to be defined in the specification; where these are not defined, customer agreement, or Prime agreement, shall be obtained.

An example situation where Table 1 applies is AMS2412 Rev G. AMS2412 states, “Composition (3.4.2), hydrogen embrittlement (3.4.4), and tests of cleaning and plating solutions (See 8.4) are periodic tests and shall be performed at a frequency selected by the processor unless frequency of testing is specified by purchaser.”

Where non-conformances are written, it is usually because a required test is either not done at all, or not carried out per the specification. Analysis has determined that this is typically due to a weak specification review and flow down process so investigate yours to determine how robust it is prior to the Nadcap audit.

Compliance

Section 6 of AC7108 deals with compliance and the job audits that the Nadcap auditor will witness to verify compliance. In the Process Observation part of Section 6, there are questions to determine whether cleaning, such as alkaline cleaning and cleanliness verification, was appropriately carried out, as defined by shop papers. This generates non-conformances typically when the water break free test is not done at all or is done but without a calibrated timer to time the...
activity. As above, the use of uncalibrated equipment is taken seriously and can result in a major non-conformance if found to be systemic.

Example Non-Conformance

What follows is an example of a non-conformance that may be identified during a Nadcap chemical processing audit, and the response that the Supplier might provide.

To best work through this, you may find it helpful to have a copy of AC7108 with you.

The Checklist Question

AC7108 3.3.1 Does shop paper/traveler, which accompanies each lot, contain as a minimum the following information.....i) specified process parameters which are controlled by the operator are recorded for each lot of parts processed, including: ...

The NCR

- Chromic Acid Anodise route card master 11231
  No place for recording immersion time in the deox tank and it is not recorded for jobs audited.
- Cadmium Plate route card master 10126
  No place for recording amperage and it is not recorded for jobs audited.

Example Response

This example response is written using the required format for corrective action responses for Nadcap accreditation.

Immediate Corrective Action Taken

- Route card masters 11231 and 10126 amended to include prompts for recording of immersion time.
and amperage. See attached.

- Other master route cards reviewed against AC7108 and App D to identify other missing parameters. Master route cards 11111, 22222 and 33333 also had items missing and are planned to be amended by 25 March 2009. See attached plan.

Root Cause of Nonconformance

- Internal procedure, IP10.5, for creation and amendment of route cards did not clearly identify items to be recorded and AC7108 Rev C has items identified in different locations.

- Document control procedure, IP8.3, appendix 2 did not include AC7108 as a document that will be reviewed and flowed down into internal instructions.

Impact of all Identified Causes and the Root Cause

- No impact, the NCR concerns recording of certain process parameters only. Lot inspection has shown acceptable visual, thickness and adhesion tests. Nadcap audit and internal audits have shown no evidence of deviation to process requirements. Note: See customer notification requirements below.

Action to Prevent Recurrence

- Internal procedure, IP10.5, for creation and amendment of route cards has been amended to identify all process parameters to be recorded. AC7108 Rev C and Appendix D were reviewed for requirements. IP10.5 also amended to reference AC7108 so that amendments to it will lead to review of IP10.5. Amended procedure attached.

- Document control procedure, IP8.3, appendix 2 has been amended to include AC7108 as a document that will be reviewed.

- Planners trained on amended IP10.5. Training record attached.

Objective Evidence Attached

- Amended route cards 11231 and 10126.

- Plan for amendment of other route cards.

- Internal procedure IP10.5 for creating route cards.

- Training for planners on IP10.5

- Document control procedure IP8.3

- Training for specification review personnel on IP8.3

Effectivity Date: 25 August 2009

Customer Notification

The Nadcap Chemical Processing Task Group requires customer notification for any deviation from customer (purchase order/drawing/specification) requirements for which there is no documented approval. This notification must be submitted in writing to all affected customers (who issued the purchase orders) for current or previously processed hardware where the same condition exists(ed). If the responsible prime (design authority) is not the direct customer but is known, notification should also be submitted to a representative of that company.

Acceptable objective evidence of customer notification must include the following:

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NADCAP CHEMICAL PROCESSING AUDIT INSIGHT

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• Evidence of written notification including evidence of receipt (Copy of Read Receipt, Delivery Receipt, Email Reply, Letter Delivery Receipt, etc)
• Date of notification
• Definition of the requirement that was violated
• Clear and complete detail of the specific violation that occurred (including the timeframe involved)
• List of affected customers and primes (including name, title, company and address of person where the notification was sent.

If you have any questions on this article or a Nadcap chemical processing audit, please do not hesitate to contact any member of the Nadcap Chemical Processing department at chemicalprocessing@p-r-i.org and we will be happy to help.

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QUALITY IS EVERYBODY’S JOB

Nadcap Auditor Garlan Barnes, who has been involved in chemical processing for many years, shares his experience on Nadcap audits:

“Prepare for the audit using the checklist. Completely. I have a saying: the amount of preparation reflects directly on the audit results. Suppliers should answer every checklist question with reference to the evidence they will provide to support their response.

“In my experience, good audit results are directly proportional to the amount of preparation done. It just makes sense and then the audit is easier for everyone. No one should see Nadcap as an audit that takes place once per year. It’s an ongoing cultural change and all participating companies should use the tools that are made available through Nadcap to benefit their organizations.

“Every single audit, I see something that surprises me. There’s always something new – processes, ideas... It’s really neat to see parts that go on aircraft and know how it’s done. I really enjoy that. The best thing is that I get to see new shapes and processes, I’ve seen many changes and improvements since I started in the industry on the shop floor and worked at one of the first Suppliers in the Nadcap process. Although the general process is the same, control is now much better than it used to be.”
Continuing the review of Nadcap procedures, in this issue, the focus is on OP 1106: Audit Report Processing. It is a very detailed procedure that describes each step of the audit report processing activity. Some of the key points are highlighted here. This article is not a replacement for your own thorough review of OP 1106.

This procedure is relevant to any company that has had, or may in the future have, a Nadcap audit. It addresses the audit review activities that take place upon submission of the audit report and describes the expectations of the Audit Report Reviewers, Subscribers, Suppliers and Auditors.

**Language**

According to OP 1106, all NCR responses, dialog in eAuditNet and paragraphs of documents used as objective evidence shall be in English. Although not clarified in the procedure, the reason for this is that Nadcap Subscribers from all over the world may be involved in the review process and it is not reasonable to expect them to be able to review technical information in every language. Consequently, English was chosen as the language to be used.

**Communication**

Emails will be sent to the relevant parties at all stages of the audit review process. For example, when the audit report is submitted by the Auditor into eAuditNet, the Supplier and Audit Report Reviewer (typically the Staff Engineer) will be notified via email. This makes it extremely important to ensure that contact details are current in eAuditNet. It is also critical that no Export Control information is entered into eAuditNet.

**Timing**

In addition to the timeframes detailed in OP 1106 (right), an allowance of 30 extra days is available to Suppliers over the audit review period (from audit report submittal to accreditation). This cumulative “lateness” is tracked in eAuditNet, with notifications sent to all involved, to help prevent exceeding this cumulative late allowance. It is important not to exceed this allowance, as it can lead to audit failure and affect merit. No extensions may be granted.

OP 1106 is available for download at www.eAuditNet.com. After logging in, you can find this procedure, and others, under Resources - Documents - Procedures and Forms - Operating Procedures.

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Audit report submitted in eAuditNet within 3 days of audit end date. PRI staff then allowed 3 days for Export Control review.

Supplier Review begins Are there any NCRs?

No

Supplier submits feedback in eAuditNet within 3 days

Yes

Supplier provides corrective action responses within 21 days

Audit Report Reviewer determines if more information is required within 14 days

No

Supplier provides more information within 7 days

Yes

Nadcap Subscribers on Task Group determine if more information is required within 14 days

No

Supplier submits feedback in eAuditNet within 3 days

Yes

Nadcap accreditation certificate issued within 5 days
RESPONDING TO NCRS IN EAUDITNET

All non-conformances identified during Nadcap audits are recorded in eAuditNet. Per OP 1105 “Conducting an Audit”, the Nadcap auditor should post the audit results to eAuditNet within three working days of the exit interview for the audit (or series of conjoined audits). You will receive an email notification when the audit report is available in eAuditNet.

At that point, you can view the audit results under Supplier Audits and need to take the following actions in eAuditNet:

1. Click on each NCR number or type to respond to each individual non-conformance
2. If you find it easier, you can click “Print NCRs” to print all the information related to the non-conformances, including discussions that have taken place within eAuditNet between your company and the Staff Engineer
3. If “Supplier Feedback” is marked as incomplete, as it is in the above screenshot, click on it to provide your feedback on the audit experience
4. Once you have responded to all non-conformances and completed the feedback form, make sure to click “Send for SE Review” to notify the Staff Engineer that the information is in the system ready for his/her review.

Do not click “Send for SE Review” until you have inputted your responses to all open non-conformances.

You may see non-conformances in eAuditNet that the auditor accepted as closed during the audit. This is normal - NCRs that are accepted on site by the auditor remain open until the Staff Engineer reviews them. This second opinion is part of the robustness of the Nadcap audit review process and strengthens the system. You are not required to respond to non-conformances that are accepted on site, or provide objective evidence through eAuditNet, unless requested by the Staff Engineer.
5. When you click on each NCR, input your response to that non-conformance using the pre-populated format in the space provided. You will need to address each element that you see, namely:
   - Immediate Corrective Action Taken
   - Root Cause of Nonconformance
   - Impact of all Identified Causes and the Root Cause
   - Action to Prevent Recurrence
   - Objective Evidence Attached
   - Effectivity Date

6. Provide objective evidence using the “Add/Edit Attachments” button. Please note that .pdf files are the preferred format.

7. When your response to this NCR is complete, click “Post”.

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8. For audits that are ITAR/EAR restricted, a prompt will appear after you click “Post” for you to confirm that none of the information you are adding to eAuditNet is restricted, and to give you the opportunity to make changes before posting it if it is restricted.

9. As well as feedback on the on site audit experience, once the audit is closed, we also want to know how you found the whole experience, from scheduling the audit through to your interaction with the Staff Engineer reviewing your audit in eAuditNet. We do ask that you provide details of anything you were dissatisfied with (“no” answers below) to help us continually improve our customer service.

If you have any questions on this process, please do not hesitate to contact PRI staff, who will be happy to help.
NADCAP SUPPLIER TOOL SHEET

As any Supplier who has gone through the Nadcap audit and accreditation process could attest, there is a wealth of supporting information available. However, feedback has indicated that there is so much information that it can be quite difficult to find the exact item needed at the time of need.

Consequently, the Nadcap Supplier Support Committee developed the Nadcap Supplier Tool Sheet to help Suppliers find useful and important documents. The Supplier Tool Sheet is publicly available on the PRI website (www.p-r-i.org/Nadcap/) as shown on the right. It is a Microsoft Excel file that you can open directly from the webpage. It is also available in eAuditNet under Documents / Public Documents / Supplier Support Committee / SSC Documents.

The Nadcap Supplier Tool Sheet is a long document and an extract is displayed below. As shown, useful items are categorized by pre- and post-audit value, with descriptions of their content and direct links to access them.

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<td>Supplier reference sheet that identifies the location of useful documents and resources in the Nadcap program</td>
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If you would like additional copies of this newsletter, please contact prinadcap@p-r-i.org