Conformity Verification Process (CVP)

Part 99 CASR

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Seanezzi PTY Ltd.

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Conformity Verification Process (CVP)

Conformity verification requirements are defined as part of Project Approval.

- **For a customer project:** the CVP requirements are defined and agreed as part of the Contract Review – jointly by Seanezzi and the customer to ensure that conformity requirements are defined, measurable and acceptable to both parties.
- **For internal product development:** the CVP requirements are based on the Design Data and Manufacturing Process approved by the Seanezzi Management Committee.

Conformity verification requirements must be defined against an approved/frozen Design Data baseline.

CVP credentials

The CVP documents the process used to ensure that our products can be certified to conform to approved Design Data. It also documents the process used to ensure consistency and repeatability of manufacture of the products in accordance with approved processes.

The CVP references the parameters to which the project must conform. It provides the conformity verification approach that will be followed by the customer and Seanezzi to ensure (and to agree) that conformance is correctly identified.

CVP Appendix A Plan

The Seanezzi CVP Appendix A Plan document captures the required content of the CVP for each project. A link to the Plan Document and a description of the content is included in Appendix A.

The responsibility to complete and manage the CVP Appendix A Plan, following the typical CVP flow shown in Appendix B, rests with the Seanezzi Project Committee and ultimately with the Seanezzi Project Manager for the project. The Seanezzi Project Committee will meet to review each step and determine and document the arising actions and to agree each subsequent conformance verification activity.

Appendix C provides general guidance around various conformity verifications and may help inform the appropriate tests to be included in the CVP.

For complex projects, the CVP may be developed in phase/stage to allow the customer to raise issues. As verification progresses, non-conformities will be recorded and managed via the CVP.

The CVP – Phase 1

Phase 1 of the CVP verifies that the Authorised Design Data can be achieved *(Step 1)* via the Authorised Manufacturing Process *(Step 2)*.

The conclusion of Phase 1 is a conformity recommendation by the Seanezzi Project Manager.

Phase 1 verifies that the product can be built to the customer's specification. It will achieve the customer's authorisation for the manufacture / installation of the first verified set of products. If the product is a result of internal product development, the Phase 1 verification is to the specification approved by the Seanezzi Management Committee in Project Approval.

Step 1: The focus of Phase 1 Step 1 is on conformity verification against the authorised Design Data. A limited conformity against manufacturing process is conducted for manufacture of the first Component (or set) to allow installation for testing and verification. Seanezzi submits our statement of conformity to the customer at the completion of Phase 1 Step 1.

Step 2: follows on from the design review of Step 1 and has the additional requirement of manufacturing process conformity. This step is the on-site verification of manufacturing and installation. During this phase the customer will

review manufacturing process documentation including traceability of material and specialised processes. Subject to agreements reached between Seanezzi and the customer during conformity verification meetings an agreement is reached and formally recorded to confirm the “recommending” and “finding” of conformity by the parties.

For major projects where the customer requires multiple statements of conformity linked to various stages of the project, multiple on-site verifications may be needed and require recording. This is the iterative process shown at Appendix B before a conformity recommendation is made by the Seanezzi Project Manager.

The CVP – Phase 2

Phase 2 verifies the further Components to be manufactured.

During Phase 2 emphasis is placed on the identification and management of design changes to ensure that conformity is conducted against an “approved” baseline.

Step 1 starts with a review of the current design data baseline with the baseline approved during Phase 1 - noting that Phase 2 may lag the completion of Phase 1 considerably, as the design may have evolved due to product operational review or manufacturing optimisation.

The customer and Seanezzi will also conduct a review of Phase 1 non-conformities at this stage to make sure that these will not prevent further progress to Phase 2. Step 1 is concluded with agreement between Seanezzi and the customer and that agreement is formally recorded.

Step 2 is the Conformity Verification of products against the manufacturing processes to support manufacture beyond the prototype. For aeronautical products, the step 2 conformity can take the form of a First Article Inspection (FAI) the results of which are recorded in the CVP. Step 2 should be conducted on-site where possible.

For projects that lead to production approval, Step 2 includes most of the manufacturing process requirements to be satisfied for the issue of the production approval.

The CVP – Project Closure

Phase 2 is an iterative process of identifying and correcting non-conformities raised during the review and recommendation of conformity by the customer and Seanezzi Project Manager.

The CVP is closed by the issue of a production approval by the Seanezzi Project Manager.

CVP agreements

The CVP must establish clear agreement of who will conduct conformity inspection, what will be conformed, when and where inspections will take place, and how conformity inspections will be recorded and submitted to the relevant authorities. The CVP should focus on:

a. Verifying the conformity of critical and major characteristics of materials, parts, and assemblies to the approved Design Data.

b. Evaluating processes to assure production of consistent and uniform products conforming to the approved Design Data.

c. Recording of non-conformities from the Design Data and their disposition.

d. Observing tests of important functional parameters of systems, modules, components and completed products.

Amendment Process

The CVP should contain a brief description of how it will be updated throughout the project to account for design changes, changes of manufacturing processes and changes of inspection requirements.

Appendix A

FMP870 CVP Appendix A Plan

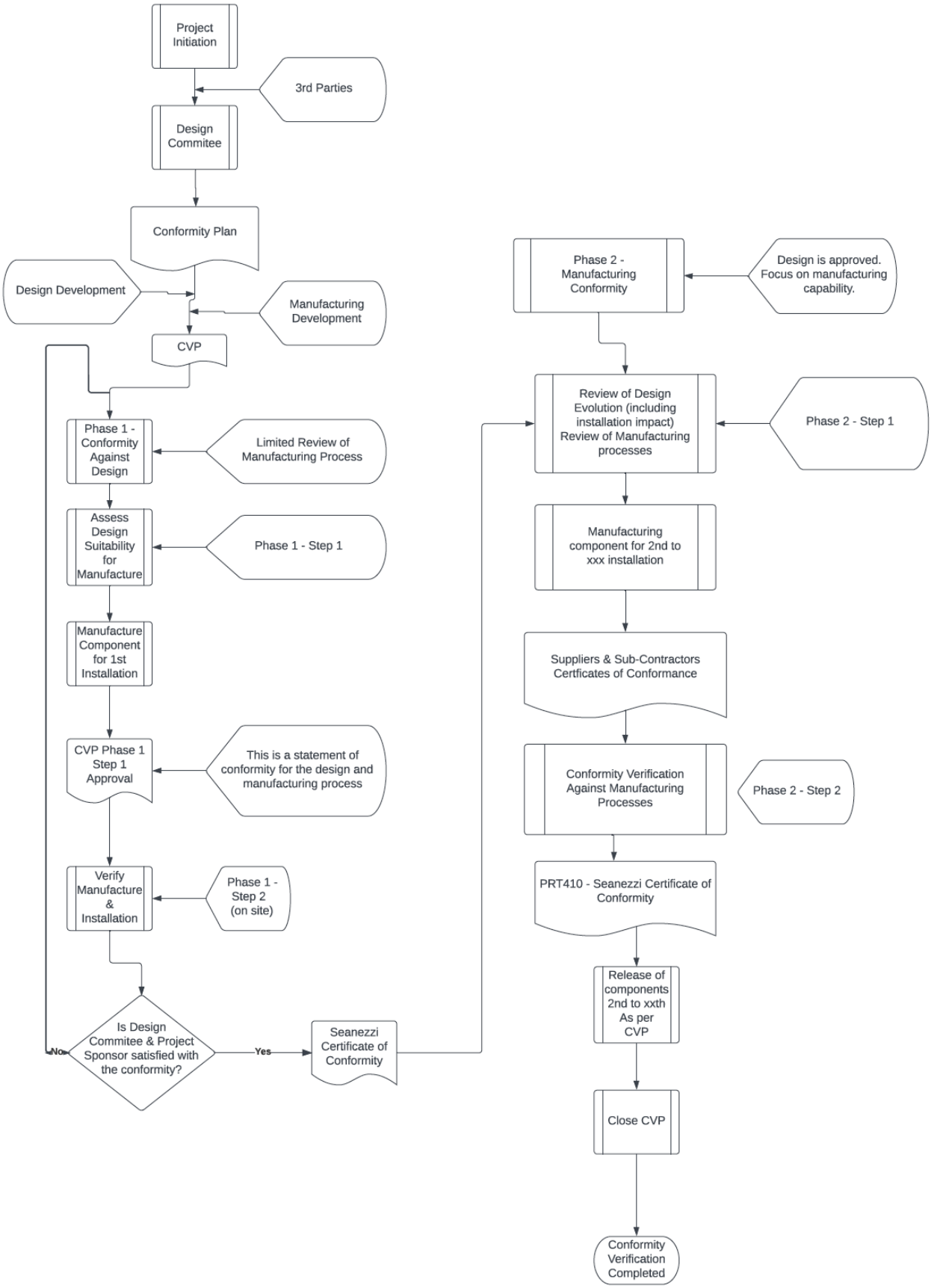
DOCUMENT: FMP870 CVP Appendix A Plan Template

The Appendix A Plan Template records the following:

General Description of the Project	A brief description of the project based on a customer Contract Review or a New Product Introduction Approval.
Responsible Persons	Names and contact details of the key responsible persons from the Customer, engineering organisation, approved suppliers, and Seanezzi with their respective responsibilities listed.
Review and Approval Process	The Appendix A Plan will be updated as the project evolves both in terms of authorised Design Data and manufacturing processes. The document is owned by Seanezzi, will be regularly reviewed by Seanezzi and customer, and updated as required.
Manufacturing Locations.	The locations where manufacturing, assembly, installation and testing is proposed to be carried out.
Proposed Suppliers	For suppliers not included in the Seanezzi List of Approved Suppliers (if any) and product/service being provided for the project. Approval of Proposed Suppliers must be achieved through the authorised Seanezzi Supplier Approval process.
Relevant Seanezzi Processes and Controls	Reference to the existing relevant controls including for Incoming Material Inspections, inspection of tools to provide traceability to the design data, process for regular check/calibration and repair/rework, and relevant sections of the Quality Manual including any special processes to be used in the manufacture, process qualification, approval of operators and process controls.
Design Data.	A record of the Design Data and its approval status for use in conformity inspection of parts, assemblies, installations or test setups. Brief reference to how the Design Data will be controlled and how the conformity requirements will be maintained as Design Data changes.
Conformity testing details and results for each Phase, Step, and Sub-step	A brief description of the component to be tested, the conformity to be tested, how the conformity test will be conducted, by whom and when. The sequence of sub-steps and actions within each Step and Phase and inspections and the authorities for recommending and finding conformance. Where inspection records are not fully recorded in the table, the table must include details or reference to the related recording documents and the outcomes of the test- including recording of discrepancies, non-conformities and deviations. Where relevant, include a brief description of how non-conforming parts will be discarded or quarantined for rework.
Conformity Recommending and Finding	This is the process for tracking customer conformity inspections and agreement. For each Phase and Step the party Recommending and Finding Conformity must be recorded using the Phase/Step Approval in the Appendix A Plan Template.

Appendix B

Conformity Flow Chart



Appendix B

General Guidance for Verifying Conformance

Verification against approved Design Data

The process for a first part or prototype initially includes identification of the original source documents and their respective revision status. The New Product Introduction Process (PRT490), the Contract Review process (DS410), Purchase Orders or equivalent documents must be examined to determine the basic requirements and the validity of the data – particularly that provided by the customer. Relevant drawings and specifications must be subject to source substantiation to ensure that the current complete data is available for the inspection.

Product conformity is determined by inspecting the completed Component. Seanezzi should make a determination that the process operations are capable of producing articles in conformity with the design requirements. The method used in determining this fact should be measurable, as required by the process specification, and recorded.

Adequacy of Drawings and Related Change Records

Tests

a. Can the part be produced and inspected using the information on the drawing?

b. Are drawing tolerances practicable and attainable under production conditions? What evidence supports this?

c. Have all of the changes been correctly made to drawings submitted to the customer for approval?

d. Does the drawing include all the characteristics necessary to inspect the part: the material to be used, the treatment of the material such as hardness, finish and special process specifications?

e. Does the drawing (or associated engineering data) include applicable test specifications?

Verification of manufacturing processes

Materials

Documented manufacturing processes must ensure the traceability of material throughout the manufacturing cycle.

Tests

a. Were raw materials used in the fabrication process in conformity with the design data?

b. Is evidence available to assure that chemical and/or physical properties were identified and checked as appropriate?

c. Is there documented evidence to show traceability from the raw material to the completed Component?

d. Are there any Parts or process deviations recorded against the submitted design data (including material review dispositions)?

Process Documents (SOPs)

In evaluating processes, Seanezzi's primarily concerned is performance and conformity. Process performance should be capable of consistently producing articles that meet the specified requirements.

Process conformity is determined by checking the articles being processed to determine that they are being processed in accordance with the process specification and that the materials, tools, and equipment called for are being utilised. Since the end results depend on strict adherence to the process instructions, any deviation or discrepancy should be corrected on the initial runs.

Tests

a. Is there a process specification (SOP) for each special process?

c. Is the process being operated in accordance with the process specification? Are any deviations recorded?

Automated Production Processes

Our production methods involving automatic machines such as milling machines, lathes, autoclaves, routers, and fabric cutters.

Traditionally, aircraft conformity inspection has been against clearly defined Type Design (TD) data, in the form of drawings and specifications. With NC or CNC machines, traditional conformity inspections may be difficult due to limited traditional TD data. In these cases, only TD data that includes the Computer Aided Design (CAD) models can be used to achieve and demonstrate conformity.

Tests

a. Is the approved Design Data (drawings, specifications, computer generated models and instructions) permanently stored and available for conformity inspections?

b. Is software used identifiable as to the package and the version?

c. Are the CAD and Computer Aided Manufacturing (CAM) programs, of proven validity?

d. Have our operators of CAD and CAM programs demonstrated competencies in the use of the particular CAD package?

e. Have operators of NC or CNC machines demonstrated competencies in the use of the machine(s)?

Non-destructive Inspection (NDI) Method Evaluation

The NDI method used must have the capability to detect the allowable defect size and location specified by the Design Data. It must show that the inspection results are repeatable, and that instruments required to perform the inspection meet the procedural acceptability requirements.

Critical and Major Characteristics

The critical and major characteristics of the Component being manufactured must be identified and its specific requirements noted and managed.

Tests

a. Have we identified and inspected all the critical and major characteristics?

b. Do we have a record of these inspections?

d. Are there any deviations recorded against the approved Design Data (including material review disposition)?

Workmanship

The impact of workmanship on the finished product must be determined and managed, especially when manufacturing is primarily manual.

Tests

a. Does workmanship contribute to the safety (SMS) of the product?

b. Have criteria been established to identify acceptable production techniques and practices?

Adequacy of Inspection Records

Progressive inspections contribute to the conformance of the finished product. Furthermore, the results of progressive inspections provide the us with substantiation of technical integrity and support the final release of the product.

Tests

a. Do the inspection records show all inspections that are conducted?

b. Do they show who conducted the inspection?

c. Do they indicate the results of the inspection and disposition of unsatisfactory conditions?

d. Are procedures adequate to ensure re-inspection of any parts that are reworked?

Material Review Action

Components that depart from approved Design Data or specifications must be subjected to material review actions to ensure that the correct decisions are made regarding their fitness for purpose.

Tests

a. Is the material review procedure documented and adequate to ensure disposition of non-conformities?

b. Is there adequate corrective action for observed non-conformities to prevent recurrence?

c. Have all considerations been reviewed and recorded for the use of “Previously Produced Parts”, including design evolution, ongoing actions, engineering deviations and waivers.

Software

Tests

a. Are all software products, including version description documents, source codes, object codes, documentation, test procedures, loaded hardware/firmware, properly identified, including revision levels, when compared to the hardware and software engineering drawings?

b. Have all software problem reports been properly dispositioned?

c. Do the records indicate that all software products, including support software and procedures, have been placed under configuration control?

d. Does the software successfully execute the initialisation procedure?

e. Have all software product problems been properly identified, recorded and corrective actions taken?

Test Components

Prior to initiating conformity activity for test Components, Seanezzi and the customer must establish and document the parameters of the test Component configuration and test equipment configuration.

The conformity of the test Component and test set-up, such as for static, endurance, operational, pressure, environmental tests, should be established as appropriate to determine conformity.

In all cases, the approved Design Data should include appropriate instructions and reference to our agreed test plan.

Prototype products or components made using different methods or processes cannot be considered part of the first production run unless full traceability can be shown for the differences between the standard manufacturing processes and the “unique” part manufacturing process.