Fluor
Marine Propulsion, LLC

P-411

Instructions for Supplier Preparation of Submittals for Reactor Plant and Propulsion Plant Procurements

10/2024

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I. GENERAL

This document establishes the definitions and instructions for Supplier preparation of submittals used for FMP reactor plant and propulsion plant procurements.

A. SUBMITTAL TYPES

The following provides a description of the types of submittals and when they shall be used.

Form P-335 Approval Request (AR) - A form initiated by the Supplier to submit technical contract documents (e.g., drawings, specifications, procedures, inspection plans, manufacturing schedules), as specified in the purchase order, for FMP approval or information.

Form P-336 Request For Information (RFI) - A form initiated by the Supplier for the purpose of requesting a contract clarification, missing information or an editorial change.

Form P-337 Request for Engineering Change (REC) - A form initiated by the Supplier which transmits a recommended change to contract technical requirements for the purpose of improving the product or methods of manufacture. All changes to FMP approved drawings on build-to-print contracts which change FMP generated technical requirements invoked on the purchase order require submittal as an REC with the following exceptions; (1) editorial corrections, (2) format changes, and (3) changes to procedures, standards, documents and drawings prepared by the Supplier which do not change technical requirements. Changes to these documents shall be submitted for approval or information in the same manner as the original submittal using the same type of submittal form or using a P-336 RFI, as appropriate.

Form P-338 Repair Approval Request (RAR) - A form initiated by the Supplier which describes a non-conforming condition and requests approval to repair the item to be in full conformance to contract technical requirements using a proposed repair that is of a different kind or is more extensive than is allowed by contract technical requirements.

Form P-339 Degradation of Specification Requirements (DSR) - A form initiated by the Supplier to describe a non-conforming condition and to request acceptance of an item which does not conform to contract technical requirements. The three types of DSRs are identified below:

General DSR - Identifies a deviated product but does not propose any repairs to correct the nonconformance.

Repair DSR - Identifies a deviated product which can be repaired to improve the component but will result in a component that will not be in full conformance with all technical requirements.

Provisional DSR - Identifies a deviated product which cannot be practicably repaired but which can be improved by provisions such as alteration of a mating component or a selective placement of the non-conforming part in an assembly.

Form P-345 Coordinated Procedure Review System (CPRS) Procedure Cover Sheet - A form initiated by the Supplier for the purpose of requesting a review of a procedure through CPRS. Additional information on CPRS can be found in CPRS Instructions & Recommendations (I&R).

B. DEFINITIONS

Coordinated Procedure Review System (CPRS) - A program for coordinating all stakeholder (i.e., Prime Contractor, Shipyard, and other Naval entities) review and approval of Supplier submittals intended to eliminate repetitive review of the submittals, prevent the transmittal of conflicting disposition of the submittals, and reduce overall stakeholder effort required to disposition the submittals.

Products - Products, as used herein, include materials, parts, intermediate assemblies, final assemblies, equipment, components, and services.

Non-conforming Products - Products that do not meet contract technical requirements.

Technical Requirements - Technical requirements include specifications, standards, drawings, other technical requirements invoked by the purchase order and Supplier originated/FMP approved drawings and procedures. Technical requirements do not include the following;

1. Requirements of procedures that are within Supplier's right to change without FMP approval and submit for information in accordance with the applicable specification or standard are not included as technical requirements.
2. Requirements of Supplier generated internal procedures, documents and drawings which are more restrictive than the specifications, standards and other technical requirements invoked by the contract are not included as technical requirements.
3. Dimensions and other characteristics which are measured at an intermediate stage of manufacturing which change during subsequent operations so as not to violate final product requirements, unless the intermediate dimensions or other characteristics were based on specific requirements in applicable specifications or standards.

II. FORM P-335 APPROVAL REQUEST (AR) SUBMITTAL INSTRUCTIONS

A P-335 AR is initiated by the Supplier to submit technical contract documents (e.g., drawings, specifications, procedures, inspection plans, manufacturing schedules), as specified in the purchase order, for FMP approval or information. ARs shall be prepared by the Supplier and submitted to FMP in accordance with the following instructions. The numbered blocks on the P-335 correspond with the block numbers in Table 1.

Table 1: Form P-335 Approval Request (AR)

Block	Information to be Provided
1	**To:** Enter the FMP facility the AR is being sent to (Bettis, Knolls, KS, NRF). See the purchase order for facility address.
2	**Attention:** Enter the FMP Contracts Professional's name.
3	**Purchase Order No:** Enter the *Purchase Order No.* from the purchase order face sheet.
4	**Release No:** If this is a release order placed against a master or blanket agreement, enter the *Release No*. listed on the purchase order face sheet. If not applicable, enter N/A.
5	**Submittal ID:** Enter in the format: *AR-Purchase Order No.-Sequential AR No.(Revision Letter if applicable).* ARs shall be numbered sequentially, starting with "1". Resubmittals shall use the same number as the initial submittal followed by a revision letter, starting with "A". For example, the first revision to the third AR on Purchase Order 123456 shall be: "AR-123456-3A".
6	**Project Name:** Enter the general title of the project work being completed.
7	**Request Type:** Check "For Approval" or "For Information Only" box, as appropriate, per the technical requirements.
8	**Description:** Enter a brief description of the information provided (e.g., procedure for welding, test procedure, drawing for review). Typically only one document should be submitted via each AR to enable more expeditious processing.
9	**Attachments:** Indicate if there are attachments to the AR and the number of pages.
10	**Contract Requirement / Reason Requested:** State the reason for this AR (e.g., provide the contract specification requirement, drawings or procedures). Enter the specification, procedure, drawing number and revision associated with the AR, if applicable. If the submittal is for a procedure that has been through the Coordinated Procedure Review System (CPRS) program, identify the letter number and date that provided approval of the procedure.
11	**Supplier Name, Title, Name, Signature and Date:** Enter the full company name, job title, and name of the person responsible for submitting this AR with a signature and date.

Table 1: Form P-335 Approval Request (AR)	
Block	**Information to be Provided**
12	**Disposition:** FMP will provide disposition of ARs within 20 business days, unless otherwise mutually agreed upon. The following provides a summary of the Supplier actions required for each disposition: • Approved - Information provided by the Supplier is approved for use in this contract. • Conditionally Approved - If Supplier concurs with the FMP conditions, Supplier shall revise the AR to comply with the FMP comments and resubmit the revised AR for FMP approval. Such resubmittal denotes Supplier's concurrence with the FMP comments. The revised AR shall be submitted within 30 business days after the conditional approval is received by the Supplier. Failure to issue a resubmittal within this period will automatically cause the conditional approval to revert to disapproval. Pending approval of the revised submittal, the Supplier may proceed with the work involved providing the Supplier complies with all FMP comments. If Supplier does not concur with all of the FMP conditions, Supplier shall notify FMP within 5 business days after FMP response so that resolution can be pursued. • Accepted - N/A • Conditionally Accepted - N/A • Disapproved - Supplier shall revise disapproved items and resubmit the revised AR for FMP approval. The Supplier shall not perform work affected by this disapproval until FMP approval is obtained. • Receipt Acknowledged - Used when the AR is provided to FMP for information only. FMP disposition of Receipt Acknowledged documents completion of required Supplier action.
13	**Comments:** Any FMP comments associated with disposition of the AR will be included in this box or on attached pages, if noted.
14	**Technical Approver Name, Signature and Date:** Upon completion of the technical review of the AR by FMP, the Technical Approver shall enter their name, signature, and date.
15	**Contracts Professional Name, Signature and Date:** Upon completion of the AR review by FMP, the Contracts Professional shall enter their name, signature, and date signed which constitutes FMP contractual authorization of the AR as dispositioned.
	Additional Information: When additional sheets are required, clearly identify each sheet as applicable to the AR, provide the applicable Block Name of supplemental information, and number all pages consecutively starting with page 2.

III. FORM P-336 REQUEST FOR INFORMATION (RFI) SUBMITTAL INSTRUCTIONS

A Form P-336 RFI is initiated by the Supplier to request a contract clarification, missing information or an editorial change. RFIs shall be prepared by the Supplier and submitted to FMP in accordance with the following instructions. The numbered blocks on the P-336 correspond with the block numbers in Table 2.

Table 2: Form P-336 Request for Information (RFI)

Block	Information to be Provided
1	**To:** Enter the FMP facility the submittal is being sent to (Bettis, Knolls, KS, NRF). See the purchase order for facility address.
2	**Attention:** Enter the FMP Contracts Professional's name.
3	**Purchase Order No:** Enter the *Purchase Order No.* from the purchase order face sheet.
4	**Release No:** If this is a release order placed against a master or blanket agreement, enter the *Release No*. listed on the purchase order face sheet. If not applicable, enter N/A.
5	**Submittal ID:** Enter in the following format: *RFI-Purchase Order No.-Sequential RFI No.*. RFIs shall be numbered sequentially, starting with "1". For example, the third RFI on Purchase Order 123456 shall be: "RFI-123456-3"
6	**Project Name:** Enter the general title of the project work being completed.
7	**Description:** Enter a brief description of the information requested (e.g., contract clarification, missing information or an editorial change).
8	**Attachments:** Indicate if there are attachments to this RFI and number of pages.
9	**Contract Requirement / Reason Requested:** Enter the specification (procedure), drawing number and revision associated with the submittal, if applicable. State the reason for this RFI (e.g., provide contract clarification, editorial change).
10	**Supplier Name, Title, Name, Signature and Date:** Enter the full company name, job title, and name of the person responsible for submitting this RFI with a signature and date.
11	**Comments / Information to Supplier:** FMP shall provide a response back to the Supplier on all RFIs to provide the requested information or indicate concurrence with Supplier's clarification within 20 business days, unless otherwise mutually agreed upon.
12	**Requestor Name, Signature and Date:** Upon completion of the RFI review, the Requestor shall enter their name, signature, and date signed.
13	**Contracts Professional Name, Signature and Date:** Upon completion of the RFI review by FMP, the Contracts Professional shall enter their name, signature, and date signed which constitutes FMP contractual authorization of the RFI as dispositioned.
	Additional Information: When additional sheets are required, clearly identify each sheet as applicable to the RFI, provide the applicable Block Name of supplemental information, and number all pages consecutively starting with page 2.

IV. FORM P-337 REQUEST FOR ENGINEERING CHANGE (REC) SUBMITTAL INSTRUCTIONS

A Form P-337 REC is initiated by the Supplier to request a change to a contract technical requirement for the purpose of improving the product or methods of manufacture. All changes to FMP approved drawings on build-to-print contracts which change FMP generated technical requirements invoked on the purchase order require submittal as an REC with the exception of:

1. Editorial corrections
2. Format changes
3. Changes to procedures, standards, documents, and drawings prepared by the Supplier which do not change technical requirements.

Changes to these documents shall be submitted for approval or information in the same manner and type of the original submittal or using a Form P-336 RFI, as appropriate.

It is FMP policy to obtain products in strict accordance with purchase order requirements. However, FMP will consider Supplier requests for changes to contract technical requirements if acceptance of the REC is of sufficient benefit to FMP to offset all FMP effort involved in implementing the change.

Responsibility for delay in schedule due to obtaining approval or rejection of an REC rests solely with the Supplier. Such lost time is to be made up by the Supplier at no increase in purchase order price to meet contract dates. Work started on or utilizing components in advance of FMP approval of an REC is done at the Supplier's risk. The Supplier shall not assume that approval will be granted because similar conditions were previously approved.

A. FMP ACTIONS

1. FMP will evaluate the submittal to determine whether it is of sufficient benefit to FMP to offset all FMP effort involved in implementing the change (e.g., engineering evaluation, specification change, drawing and technical manual changes, quantity of repair parts, interchangeability studies). RECs are disapproved and returned to the Supplier without further engineering evaluation if the benefit to FMP is insufficient with reason(s) for return indicated.
2. Contractual Authorization
   a. No Change in Contract Cost or Delivery

      The signature of an FMP Contracts Professional on the final approved REC constitutes contractual authorization for disposition of the REC. FMP approval does not authorize any increase in the purchase order price or delay in delivery.

   b. Change in Contract Cost or Delivery

      If REC approval results in a change in purchase order price or delivery, an amendment to the purchase order shall be required for incorporation of the proposed approved changes into the contract. FMP approval of the REC does not authorize any increase in the purchase order price or delay in delivery.

B. PREPARATION OF THE FORM P-337 REC

RECs shall be prepared by the Supplier and submitted to FMP in accordance with the following instructions. The numbered blocks on the P-337 correspond with the block numbers in Table 3.

Table 3: Form P-337 Request for Engineering Change (REC)	
Block	**Information to be Provided**
1	**To:** Enter the FMP facility the REC is being sent to (Bettis, Knolls, KS, NRF). See the purchase order for facility address.
2	**Attention:** Enter the FMP Contract Professional's name.
3	**Purchase Order No:** Enter the *Purchase Order No.* from the purchase order face sheet.
4	**Release No:** If this is a release order placed against a master or blanket agreement, enter the *Release No*. listed on the purchase order face sheet. If not applicable, enter N/A.
5	**Submittal ID:** Enter in the following format: *REC-Purchase Order No.-Sequential REC No. (Revision Letter if applicable).* RECs shall be numbered sequentially, starting with "1". Resubmittals shall use the same number as the initial submittal followed by a revision letter, starting with "A". For example, the first revision to the third REC on Purchase Order 123456 shall be: "REC-123456-3A"
6	**Project Name:** Enter the general title of the project work being completed.
7	**Drawing No. & Rev.:** Enter Drawing number and revision affected, if applicable.
8	**Specification No. & Rev.:** Enter the specification (procedure) number associated with the submittal, if applicable.
9	**Drawing Item No.:** Enter the drawing item number, if applicable.
10	**Part Name:** Enter the drawing part name, if applicable.
11	**Detailed Description of Present Requirement and Proposed Change:** Provide the existing contract technical requirement to be revised. State the proposed change(s) in concise and specific wording to facilitate revision of applicable contract technical documents. Attach additional sheets, supplemental drawings or sketches, if required. When attached, each must be clearly identified as applicable to the particular request and must be page-numbered in consecutive order beginning with page 2.
12	**Justification & Benefit to the Government for Acceptance:** Identify effect on cost, delivery, quality, ease of manufacture or product improvement of the proposed change, with sufficient supporting information to justify the conclusions.
13	**Detailed Engineering Basis for Acceptance Including Compounding Effects:** Define the problem or improvement that the proposed change is intended to correct (such as repetitive non-conforming condition, failure, malfunction, cost factors, or needed product improvement). Include any additional effect on quality, ease of manufacture, improvement in performance, life, safety, interchangeability, maintainability, or reliability with sufficient supporting information to justify the conclusions. Provide calculations, fit-up of mating parts, effect on strength or other properties and changes in operating characteristics, etc., as applicable. When the REC is directed towards providing a new capability, the improvements must be described in specific numerical terms. A list of any testing performed prior to the submittal of the REC shall be included, when applicable.
14	**Effect on Price:** If there is a change in purchase order price due to approval of this REC, enter the dollar amount here. If there is no change, specify "none".
15	**Effect on Delivery:** If there is a change in the delivery schedule, enter the estimated revised date here. If there is no change, specify "none".
16	**Supplier Name, Title, Name, Signature and Date:** Enter the full company name, job title, and name of the person responsible for submitting this REC with a signature and date.

Table 3: Form P-337 Request for Engineering Change (REC)	
Block	**Information to be Provided**
17	**Disposition:** See Section IV.A for a discussion on FMP actions on REC submittals. FMP will provide disposition of the REC within 20 business days, unless otherwise mutually agreed upon. The following provides a summary of Supplier actions required for each disposition: • Approved - Supplier's recommended action is approved. See Section IV.A.2 for contractual authorization of the approved REC. • Conditionally Approved - If Supplier concurs with the FMP conditions, Supplier shall revise the REC to comply with the FMP comments and resubmit the revised REC for FMP approval. Such resubmittal denotes Supplier's concurrence with the FMP comments. The revised REC shall be submitted within 30 business days after the conditional approval is received by the Supplier. Failure to issue a resubmittal within this period will automatically cause the conditional approval to revert to disapproval. If Supplier does not concur with all of the FMP conditions, Supplier shall notify FMP within 5 business days after FMP response so that resolution can be pursued. Note that a resubmittal is required within 30 business days. Failure to issue a resubmittal within this period will automatically cause the conditional approval to revert to disapproval. • Disapproved - Supplier's recommended action is not acceptable to FMP for reason(s) provided and is not approved.
18	**Comments:** Any FMP comments associated with disposition of the REC will be included in this box or on attached pages, if noted.
19	**Technical Approver Name, Signature and Date:** Upon completion of the REC review by FMP, the Technical Approver shall enter their name, signature, and date signed.
20	**Technical Manager Name, Signature and Date:** Upon completion of the REC review by FMP, the Technical Manager shall enter their name, signature, and date signed.
21	**Charge Code(s):** For FMP internal use.
22	**Financial Services Name, Signature and Date:** For FMP internal use.
23	**Contracts Professional Name, Signature and Date:** Upon completion of the REC review by FMP, the Contracts Professional shall enter their name, signature, and date signed. See Section IV.A.2 for contractual authorization.
	Additional Information: When additional sheets are required, clearly identify each sheet as applicable to the REC, provide the applicable Block Name of supplemental information, and number all pages consecutively starting with page 2.

V. FORM P-338 REPAIR APPROVAL REQUEST (RAR) SUBMITTAL INSTRUCTIONS

A Form P-338 RAR is initiated by the Supplier to describe a non-conforming condition and request approval to repair the products, provided all the following conditions exist:

1. The non-conforming condition violates a contract technical requirement.
2. The item can be repaired to be in full conformance with all technical requirements.
3. The proposed repair is of a different kind or is more extensive than allowed by technical requirements. A repair is considered of a different kind than allowed if the technical requirements either do not mention the type of repair proposed or specify that the repair is not allowed unless otherwise approved.

If the technical requirements prohibit the proposed type of repair, appropriate action is to be taken via a DSR.

If the technical requirements specifically allow the type of repair subject to fulfilling certain conditions, an RAR is not required if those conditions are fulfilled. This applies even if one of the conditions to be fulfilled is that the Supplier obtain approval of each specific repair in question prior to proceeding with the repair.

It is FMP policy to obtain products in strict accordance with contract requirements. However, FMP will consider Supplier requests for acceptance of non-conforming processes if acceptance of the RAR is of sufficient benefit to FMP to offset all FMP effort involved in evaluating the technical acceptability of the non-conforming condition.

Responsibility for delay in schedule resulting from repair or replacement of non-conforming supplies or from delay in obtaining approval or rejection of an RAR rests solely with the Supplier. Such lost time is to be made up by the Supplier at no increase in purchase order price to meet contract dates. Work started on or utilizing non-conforming components in advance of FMP approval of an RAR is done at Supplier's risk. The Supplier shall not assume that approval will be granted because similar conditions were previously approved.

A. SUPPLIER ACTIONS

1. RAR Submittal

   a. RARs for non-subcontracted products shall be submitted to FMP within 15 business days after the non-conforming condition is discovered.

   b. RARs for subcontracted products shall be submitted to FMP within 30 business days after the non-conforming condition is discovered.

   c. FMP shall be formally notified of any RAR condition that exists which will not be submitted prior to expiration of the contractual submittal dates (15 or 30 days).

   d. When a quantity of deviated material or parts have been fabricated before the deviation is first detected, an RAR shall be submitted on the first component(s) discovered, and addenda submitted as additional components are determined to be rejected for the same cause. In the original RAR the Supplier shall identify the maximum quantity of products affected by the cause.

   e. When it is uncertain under which existing contract a specific component or subcomponent will be delivered, the Supplier may submit an RAR for the specific component against any or all existing contracts for the same type of equipment. In such a case, the Supplier shall identify all the contracts for which approval is

requested and shall identify the specific contract requirements violated on each contract.

2. RAR Approval

   FMP approval of the RAR constitutes approval to proceed with the repair, inspection, and disposition of the product. Upon completion of the repair, the following two alternatives exist:

   a. If the product meets the expected condition identified in the original RAR, the RAR shall be resubmitted for information only. The resubmittal need not be the entire RAR but rather consist of notification that and how all conditions have been complied with, including appropriate inspection results. If all conditions have not been complied with, resubmittal of the RAR for approval shall be required.

   b. If the product fails to meet any of the defined limits upon completion of the repair or if the Supplier specified provisions or FMP imposed conditions are not fully complied with and the Supplier still intends to use the product, the Supplier shall submit a revision to the original RAR which must (a) reference the original "RAR" number; (b) identify the contract technical requirement violated; (c) identify the as-built condition; and (d) identify the cause and corrective action applicable to the failure to meet the specified requirement. FMP disposition of this RAR determines disposition of the product.

3. RAR Conditional Approval

   When FMP dispositions an RAR as "Conditionally Approved", the Supplier shall:

   a. Review FMP Conditions

      The Supplier must notify FMP within 5 business days after FMP response if the Supplier disagrees with the conditions for approval. Failure to notify FMP within this time frame signifies concurrence with FMP conditions for approval.

   b. Resubmit Conditionally Approved RAR

      Resubmit the conditionally approved RAR to FMP within 10 business days after the conditions have been complied with for information or re-approval (when re-approval was identified as a condition of approval). The resubmittal shall include appropriate inspection results and when submitted for information, need not consist of the entire RAR but rather consist of notification that, and how all conditions have been complied with.

      If resubmittal cannot be provided within 10 business days, an explanation shall be submitted with the DSR explaining the circumstances which caused the delay.

4. System for Control

   Establish a control system which includes the use of separate tags for each approved RAR on any of the affected components. As a part of this control, the Supplier shall ensure that: (a) tags are placed on the component itself or on shop processing documents which accompany the affected components, (b) the tag remains with the component until the conditions are complied with, (c) the tag remains a part of the permanent record of each component and (d) a log is maintained listing the conditions and the status of compliance with the conditions. This log shall be continuously updated so that it reflects the current status of each condition. The log or a list containing the same information shall be submitted to FMP each month.

An identification system that does not involve tags may be used by the Supplier provided that the system is equivalent to the tagging system above (including the requirement that paperwork accompany the component) and is approved by FMP.

5. Order Certification Documentation

   Identify conditionally approved RARs in the order certification. Include a statement both on the resubmitted RAR and in the order certification indicating that and how the conditions were complied with or a reference to the document which describes how the conditions were met.

B. FMP ACTIONS

1. FMP shall first evaluate whether acceptance of the RAR is of sufficient benefit to FMP to offset all FMP effort involved in evaluating the technical acceptability of the non-conforming condition. RARs shall be disapproved and returned to the Supplier without further engineering evaluation if the benefit to FMP is insufficient. The Supplier will be advised of the reason for disapproval.
2. If the RAR has not been properly submitted, or does not have thoroughly responsive content, FMP will immediately require the Supplier to take necessary action to have the RAR completed or corrected.
3. If the RAR has been properly prepared and is satisfactory with respect to the foregoing, FMP will evaluate the RAR in accordance with the following criteria:
   a. In instances where FMP considers the RAR either acceptable or unacceptable from a technical standpoint, the RAR will be dispositioned accordingly and returned to the Supplier for appropriate action.
   b. In instances where the FMP evaluation indicates the Supplier's submittal to require modification before it can be accepted, FMP may:
      i. Disapprove the RAR and advise the Supplier that it will be reconsidered for approval with the inclusion of certain additional information and/or actions.
      ii. Conditionally approve the RAR subject to the Supplier's compliance with certain further stated requirements, such as identification of FMP release points through which the affected component may be conditionally released and/or at which FMP release point the component may not be released.
4. Contractual Authorization

   The signature of an FMP Contracts Professional on the final approved RAR constitutes contractual authorization for disposition of that RAR. FMP approval does not authorize any increase in the purchase order price or delay in delivery.

C. PREPARATION OF THE FORM P-338 RAR

RARs shall be prepared by the Supplier and submitted to FMP in accordance with the following instructions. The numbered blocks on the P-338 correspond with the block numbers in Table 4.

Table 4: Form P-338 Repair Approval Request (RAR)	
Block	**Information to be Provided**
1	**To:** Enter the FMP facility the RAR is being sent to (Bettis, Knolls, KS, NRF). See the purchase order for facility address.
2	**Attention:** Enter the FMP Contracts Professional's name.
3	**Purchase Order No:** Enter the *Purchase Order No.* from the purchase order face sheet.
4	**Release No:** If this is a release order placed against a master or blanket agreement, enter the *Release No*. listed on the purchase order face sheet. If not applicable, enter N/A.
5	**Submittal ID:** Enter in the following format: *RAR-Purchase Order No.-Sequential RAR No.(Revision Letter if applicable).* RARs shall be numbered sequentially, starting with "1". Resubmittals shall use the same number as the initial submittal followed by a revision letter, starting with "A". For example, the first revision to the third RAR on Purchase Order 123456 shall be: "RAR-123456-3A"
6	**Project Name:** Enter the general title of the project work being completed.
7	**Drawing No. & Rev.:** Enter the drawing number and revision affected, if applicable.
8	**Specification No. & Rev.:** Enter the specification (procedure) number associated with the submittal, if applicable.
9	**Drawing Item No. & Part Name:** Enter the drawing item number and drawing part name, if applicable.
10	**Serial Number:** Enter the unique part serial number for the deviated component, if applicable. If a unique serial number has not been identified, the Supplier shall maintain records to identify the component(s) affected by the discrepant condition. An RAR should normally only cover one part or component serial number. However, when the discrepant condition is applicable to more than one part or component serial number due to discrepancies such as material test results, heat treatment, omission of a fabrication or inspection operation, or procedure violation, all serial numbers may be listed on the RAR provided each is listed by affected contract. When the non-conforming condition applies to a material used in the manufacturing process (e.g., weld wire or flux), the RAR should address all affected component and/or part serial numbers on current contracts.
11	**Date of Discovery**: Enter the date the deviation was determined to exist. This date is the date after which sufficient processing, rework and/or inspection, if necessary, is completed to enable the non-conforming condition to be fully and specifically described in terms of a deviation from technical requirements.
12	**Contract Technical Requirement Violated:** Provide the specific technical requirements of the purchase order with which the deviated product fails to conform.
13	**Detailed Description of Deviation:** Describe the deviated condition clearly and fully. The description shall ensure that repaired areas are precisely located relative to permanent features on the component (e.g., axes) so as to ensure complete traceability after component delivery. Use additional data and sketches (to be attached as required) to present a clear description of the deviation. Where defective product results from malfunction or lack of control of an operation or a process, define the quantity and identification of product that has been processed through the operation or process subsequent to the inspection of the defective product being submitted for acceptance. For non-conforming conditions caused by a lower-tier supplier, the present location of the non-conforming supplies, and the organization that discovered the non-conforming conditions shall be identified.
14	**Supplier Name, Title, Name, Signature and Date:** Enter the full company name, job title, and name of the person responsible for submitting this RAR with a signature and date.

Table 4: Form P-338 Repair Approval Request (RAR)	
Block	**Information to be Provided**
15	**Disposition:** See Sections V.A. and V.B. for a discussion on Supplier and FMP actions required on RAR submittals. FMP will provide disposition of the RAR within 20 business days, unless otherwise mutually agreed upon. The following provides a summary of Supplier actions required for each disposition: • Approved - Supplier's recommended action is approved. The RAR becomes a contract document without further action by the Supplier. • Conditionally Approved - Supplier's recommended action is acceptable provided that the conditions specified by FMP are met by the Supplier. Supplier must notify FMP within 5 business days after FMP response if the Supplier disagrees with the conditions for approval. Failure to notify FMP within this time frame signifies concurrence with FMP conditions for approval. The Supplier shall resubmit the RAR to FMP for information or approval (as required), indicate how all conditions for approval have been complied with including appropriate inspection results. A copy of the original RAR signed by FMP shall be attached. If the resubmittal is for information, the resubmitted RAR becomes a contract document without further action by FMP. If all conditions have not been met, resubmittal of the RAR for approval is required. • Disapproved - Supplier's recommended action is not acceptable to FMP for reason(s) provided and is not approved.
16	**Comments:** Any FMP comments associated with disposition of the RAR will be included in this box or on attached pages, if noted.
17	**Technical Approver Name, Signature and Date:** Upon completion of the RAR review by FMP, the Technical Approver shall enter their name, signature, and date signed.
18	**Contracts Professional Name, Signature and Date:** Upon completion of the RAR review by FMP, the Contracts Professional shall enter their name, signature, and date signed which constitutes FMP contractual authorization of the RAR as dispositioned. FMP approval does not authorize any increase in the purchase order price or delay in delivery.
19	**Detailed Engineering Basis for Acceptance Including Compounding Effects:** The Supplier shall provide complete technical justification for acceptability of the non-conforming condition including calculations, fit-up of mating parts, effect on strength and other properties, and any changes in component operating characteristics. When the justification which can be provided by the Supplier is incomplete due to the lack of access to design information, this should be explained. Also, provide specific discussion documenting the results of a review of all other previous and open DSRs/RARs. This review shall not be limited to the DSRs/RARs on the affected part, component, or subcomponent identified, but shall include review of DSRs/RARs on other parts of the component that have a direct functional relationship with the deficient characteristic to determine any compounding effects of accepting deviated conditions. In any case, identify the effect, if any, of the non-conforming condition on subsequent manufacturing steps. The justification shall include all proposed and alternate courses of action, with sufficient information to justify the conclusions.
20	**Error Cause and Corrective Action Taken to Prevent Recurrence:** The Supplier shall provide the cause of the non-conforming condition and corrective action taken or that will be taken by the Supplier to prevent recurrence. Corrective action related to operator error shall identify the number of similar deviations that this operator has been responsible for, on this order, within the past six month period. If the corrective action has not yet been completed, a date should be identified for completion of the corrective action.
21	**Previous RAR/DSRs of the Same Non-Conforming Condition:** The Supplier shall provide a list by submittal number of all RARs/DSRs previously issued on the part(s) (i.e., same serial numbers) covered by this request. Also, include those RARs/DSRs under review by FMP.

Table 4: Form P-338 Repair Approval Request (RAR)	
Block	**Information to be Provided**
22	**Recommended Change to Technical Requirements:** Identify whether a change to technical requirements will be recommended to prevent recurrence including the scheduled date for submitting the recommendation. Any recommended change shall be submitted in the appropriate form (e.g., as an REC) with the necessary technical support.
	Additional Information: When additional sheets are required, clearly identify each sheet as applicable to the RAR, provide the applicable Block Name of supplemental information, and number all pages consecutively starting with page 2.

VI. FORM P-339 DEGRADATION OF SPECIFICATION REQUIREMENTS (DSR) SUBMITTAL INSTRUCTIONS

A Form P-339 DSR is initiated by the Supplier to describe a non-conforming condition and to request acceptance of an item which does not conform to contract technical requirements.

It is FMP policy to obtain products in strict accordance with contract requirements. However, FMP will consider Supplier requests for acceptance of non-conforming product(s) if acceptance of the DSR is of sufficient benefit to FMP to offset all FMP effort involved in evaluating the technical acceptability of the non-conforming condition.

Responsibility for delay in schedule resulting from repair or replacement of non-conforming supplies or from delay in obtaining approval or rejection of a DSR rests solely with the Supplier. Such lost time is to be made up by the Supplier at no increase in purchase order price to meet contract dates. Work started on or utilizing non-conforming products in advance of FMP approval of a DSR is done at Supplier's risk. The Supplier shall not assume that approval will be granted because similar conditions were approved previously.

A. SUPPLIER ACTIONS

1. DSR Class

   DSRs of each type are further categorized by class based upon their significance to the performance of the equipment as defined below. The Supplier shall make a determination whether the DSR is Class I or Class II using the Supplier's best judgement based upon the available information.

   a. Class I DSRs are those which impair the performance, life, safety, interchangeability, maintainability, or reliability of the equipment.

      The following are examples of Class I DSR conditions:

      - Performance is impaired if the non-conforming condition degrades component performance below the minimum design specifications or approved relaxations to minimum design specifications.
      - Performance is impaired if the non-conforming condition would have any effect on the operation of the reactor plant (e.g., would prevent a reactor plant from using the least restrictive operating curves or reactor plant operating limits developed for the project involved).
      - Interchangeability is impaired if the as-delivered component is not suitable for installation in all the locations in which it could be installed if the deviation did not exist. This applies even when FMP intends to have the delivered component installed in an acceptable location.
      - Interchangeability is impaired if the delivered component would not be repairable using replacement parts which conform to the applicable component drawings.

   b. Class II DSRs are those which do not impair the performance, life, safety, interchangeability, maintainability, or reliability of the equipment.

   c. Class N/A does not apply to this contract and shall not be checked.

2. DSR Submittal

   a. DSRs for non-subcontracted products shall be submitted to FMP within 15 business days after the non-conforming condition is discovered.

b. DSRs for subcontracted products shall be submitted to FMP within 30 business days after the non-conforming condition is discovered.

c. FMP shall be formally notified of any DSR condition that exists which will not be submitted prior to expiration of the contractual submittal dates (15 or 30 days).

d. When a quantity of deviated material or parts have been fabricated before the deviation is first detected, a DSR shall be submitted on the first component(s) discovered, and addenda submitted as additional components are determined to be rejected for the same cause. In the original DSR, the Supplier shall identify the maximum quantity of products affected by the cause.

e. When it is uncertain under which existing contract a specific component or subcomponent will be delivered, the Supplier may submit a DSR for the specific component against any or all existing contracts for the same type of equipment. In such a case, the Supplier shall identify all the contracts for which approval is requested and shall identify the specific contract requirements violated on each contract.

3. DSR Conditional Approval

When FMP dispositions a DSR as "Conditionally Approved", the Supplier shall:

a. Review FMP Conditions

The Supplier shall notify FMP within 5 business days after FMP response if the Supplier disagrees with the conditions for approval. Failure to notify FMP within this time frame signifies concurrence with FMP conditions for approval.

b. Establish a System for Control

The Supplier shall establish and maintain a control system for each conditionally approved DSR on any of the affected components until the conditions are complied with.

c. Resubmit Conditionally Approved DSR

Resubmit the conditionally approved DSR to FMP within 10 business days after the conditions have been complied with for information or re-approval (when re-approval was identified as a condition of approval). When resubmitted for information, the DSR shall include as a minimum, that, and how, all conditions have been complied with including appropriate inspection results.

If any specified provisions, repaired conditions or other conditions imposed by FMP are outside any of the defined limits or not fully complied with, such deviations shall be submitted for disposition as a revision to the original DSR. This submittal shall specifically list the new DSR condition.

If resubmittal cannot be provided within 10 business days, an explanation shall be submitted with the DSR explaining the circumstances which caused the delay.

4. Order Certification Documentation

Identify conditionally approved DSRs and repair DSRs in the order certification. Include a statement both on the resubmitted DSR and in the order certification indicating how the conditions were complied with or a reference to the document which describes how the conditions were met.

B. FMP ACTIONS

1. FMP shall first evaluate whether acceptance of the DSR is of sufficient benefit to FMP to offset all FMP effort involved in evaluating the technical acceptability of the non-conforming condition. DSRs shall be disapproved and returned to the Supplier without further engineering evaluation if the benefit to FMP is insufficient. The Supplier will be advised of the reason for disapproval.
2. If the DSR has not been properly submitted, has not been properly classified as a Class I or II DSR or does not have thoroughly responsive content, FMP will immediately require the Supplier to take necessary action to have the DSR completed or corrected. DSRs which require the Supplier to submit additional technical justification to support acceptability of the non-conforming condition will not be approved. In addition, Class II DSRs are disapproved without technical evaluation if the non-conforming condition is indicative of especially poor workmanship.
3. FMP will then evaluate the DSR in accordance with the following criteria:
    a. In instances where FMP considers the DSR either acceptable or unacceptable from a technical standpoint, the DSR will be dispositioned accordingly and returned to the Supplier for appropriate action.
    b. In instances where the FMP evaluation indicates the Supplier's submittal requires modification before it can be accepted, FMP may:
        i. Disapprove the DSR and advise the Supplier that it will be reconsidered for approval with the inclusion of certain additional information and/or actions.
        ii. Conditionally approve the DSR subject to the Supplier's compliance with certain further stated requirements.
    c. In instances where the Supplier has identified the DSR as a Provisional or Repair DSR, FMP will conditionally approve the initial DSR if it is technically acceptable and of sufficient benefit to FMP. Such dispositions will, as a minimum, be subject to acceptable compliance with the Supplier's provisions or satisfactory completion of repairs.

        FMP conditional approval of Provisional or Repair DSRs constitutes approval to proceed with the repair, inspection, and disposition of the product. Upon completion of the repair, the following two alternatives exist:

        i. If the product meets or is less deviated than the expected condition identified in the original DSR, the DSR shall be resubmitted for information only. The resubmittal need not be the entire DSR but rather consist of notification that, and how all conditions have been complied with, including appropriate inspection results. If all conditions have not been complied with, resubmittal of the DSR for approval shall be required.
        ii. If the product fails to meet any of the defined limits upon completion of the repair or if the Supplier specified provisions or FMP imposed conditions are not fully complied with and the Supplier still proposes to use the product, the Supplier shall submit a revision to the original DSR which must (a) reference the original "Provisional or Repair DSR" number; (b) identify the defined limit which was to be met following repair, as identified in the original DSR; (c) identify the contract technical requirement violated; and (d) identify the as-built condition. FMP disposition of this DSR determines disposition of the product.

4. Contractual Authorization

   The signature of an FMP Contracts Professional on the final approved DSR constitutes contractual authorization for disposition of that DSR. FMP approval does not authorize any increase in the purchase order price or delay in delivery.

C. PREPARATION OF THE FORM P-339 DSR

DSRs shall be prepared by the Supplier and submitted to FMP in accordance with the following instructions. The numbered blocks on the P-339 correspond with the block numbers in Table 5.

Table 5: Form P-339 Degradation of Specification Requirements (DSR)

Block	Information to be Provided
1	**To:** Enter the FMP facility the DSR is being sent to (Bettis, Knolls, KS, NRF). See the purchase order for facility address.
2	**Attention:** Enter the FMP Contracts Professional's name.
3	**Purchase Order No:** Enter the *Purchase Order No.* from the purchase order face sheet.
4	**Release No:** If this is a release order placed against a master or blanket agreement, enter the *Release No*. listed on the purchase order face sheet. If not applicable, enter N/A.
5	**Submittal ID:** Enter in the following format: *DSR-Purchase Order No.-Sequential DSR No. (Revision Letter if applicable)* DSRs shall be numbered sequentially, starting with "1". Resubmittals shall use the same number as the initial submittal followed by a revision letter, starting with "A". For example, the first revision to the third DSR on Purchase Order 123456 shall be: "DSR-123456-3A"
6	**Project Name:** Enter the general title of the project work being completed.
7	**DSR Type:** Check the appropriate box. DSRs are categorized by type as follows: • DSR - Identifies a deviated component but does not propose any repairs to correct the nonconformance. • Repair DSR - Identifies a deviated product which can be repaired to improve the component but will result in a component that will not be in full conformance with all technical requirements. • Provisional DSR - Identifies a deviated product which cannot be practicably repaired but which can be improved by provisions such as alteration of a mating component or a selective placement of the non-conforming part in an assembly.
8	**DSR Class:** Check the appropriate box. DSRs are divided into classes based upon their significance to the performance of the equipment as discussed in Section VI.A.1
9	**Drawing No. & Rev.:** Enter the drawing number and revision affected, if applicable.
10	**Specification No. & Rev.:** Enter the specification (procedure) number associated with the DSR, if applicable.
11	**Drawing Item No. & Part Name:** Enter the drawing item number and drawing part name.
12	**Serial Number:** Enter the unique part serial number for the deviated component, if applicable. If a unique serial number has not been identified, the Supplier shall maintain records to identify the component(s) affected by the discrepant condition. A DSR should normally only cover one part or component serial number. However, when the discrepant condition is applicable to more than one part or component serial number due to discrepancies such as material test results, heat treatment, omission of a fabrication or inspection operation, or procedure violation, all serial numbers may be listed on the DSR provided each is listed by affected contract. When the non-conforming condition applies to a material used in the manufacturing process (e.g., weld wire or flux), the DSR should address all affected component and/or part serial numbers on current contracts. Final assembly dimensional deviations should always be reported on one DSR per component.

Table 5: Form P-339 Degradation of Specification Requirements (DSR)	
Block	**Information to be Provided**
13	**Date of Discovery:** Enter the date the deviation was determined to exist. This date is the date after which sufficient processing, rework and/or inspection, if necessary, is completed to enable the non-conforming condition to be fully and specifically described in terms of a deviation from technical requirements.
14	**Contract Technical Requirement Violated:** Provide the specific technical requirements of the purchase order with which the deviated product fails to conform.
15	**Detailed Description of Deviation:** Describe the deviated condition clearly and fully. The description shall ensure that dimensional deviations are precisely located relative to permanent features on the component (e.g., axes) so as to ensure complete traceability after component delivery. Use additional data and sketches (to be attached as required) to present a clear description of the deviation. Provisional and Repair DSRs shall include a description of the non-conforming condition with definitive limits that are expected to exist after the repair or provisions that are to be imposed on the component, such as selective placement. Where defective product results from malfunction or lack of control of an operation or a process, define the quantity and identification of product that has been processed through the operation or process subsequent to the inspection of the defective product being submitted for acceptance. For non-conforming conditions caused by a lower-tier supplier, the present location of the non-conforming supplies and the organization that discovered the non-conforming conditions shall be identified.
16	**Supplier Name, Title, Name, Signature and Date:** Enter the full company name, job title, and name of the person responsible for submitting this DSR with a signature and date. • Class I DSRs shall be signed by a person in the Supplier's management who has direct responsibility for the manufacturing, engineering, and quality control for the non-conforming product. Any subsequent information submitted by the Supplier in connection with Class I DSRs must also be signed at this level. • Class II DSRs shall be signed by the Supplier's Manager of Engineering or Manufacturing or one of their superiors for the non-conforming product. Any subsequent information submitted by the Supplier in connection with Class II DSRs must also be signed at this level.
17	**Disposition:** See Sections VI.A & VI.B for a discussion on Supplier and FMP actions required on DSRs. FMP will provide disposition of the DSR within 20 business days, unless otherwise mutually agreed upon. The following provides a summary of Supplier actions required for each disposition: • Approved - Supplier's recommended action is approved. The DSR becomes a contract document without further action by the Supplier. • Conditionally Approved - Supplier's recommended action is acceptable provided that the conditions specified by FMP are met by the Supplier. The Supplier must notify FMP within 5 business days after FMP response if the Supplier disagrees with the conditions for approval. Failure to notify FMP within this time frame signifies concurrence with FMP conditions for approval. Supplier shall resubmit DSR to FMP for information or approval (as required) and indicate how all conditions for approval have been complied with including appropriate inspection results. A copy of the original DSR signed by FMP shall be attached. If the resubmittal is for information, the resubmitted DSR becomes a contract document without further action by FMP. If all conditions have not been met, resubmittal of the DSR for approval is required. • Disapproved - Supplier's recommended action is not acceptable to FMP for reason(s) provided and is not approved.
18	**Comments:** Any FMP comments associated with disposition of the submittal will be included in this box or on attached pages, if noted.
19	**Technical Approver Name, Signature and Date:** Upon completion of the DSR review by FMP, the Technical Approver shall enter their name, signature, and date signed.

Table 5: Form P-339 Degradation of Specification Requirements (DSR)	
Block	**Information to be Provided**
20	**Contracts Professional Name, Signature and Date:** Upon completion of the DSR review by FMP, the Contracts Professional shall enter their name, signature, and date signed. which constitutes FMP contractual authorization of the DSR as dispositioned. FMP approval does not authorize any increase in the purchase order price or delay in delivery.
21	**Benefit to the Government for Acceptance:** The Supplier shall provide Identification of the overriding benefit to the Government for accepting the non-conforming item rather than requiring repairs or replacement to be in full conformance with contract requirements. When providing this information, consider all elements which may provide benefit, including technical aspects, delivery, cost considerations, etc.
22	**Detailed Engineering Basis for Acceptance Including Compounding Effects:** The Supplier shall provide complete technical justification for acceptability of the non-conforming condition including calculations, fit-up of mating parts, effect on strength and other properties, and any changes in component operating characteristics. When the justification which can be provided by the Supplier is incomplete due to the lack of access to design information, this should be explained. Also, provide specific discussion documenting the results of a review of all other previous and open DSRs/RARs. This review shall not be limited to the DSRs/RARs on the affected part, component, or subcomponent identified, but shall include review of DSRs/RARs on other parts of the component that have a direct functional relationship with the deficient characteristic to determine any compounding effects of accepting deviated conditions. In any case, identify the effect, if any, of the non-conforming condition on subsequent manufacturing steps. Explain why acceptance rather than repair is recommended. The justification shall include all proposed and alternate courses of action, with sufficient information to justify the conclusions.
23	**Error Cause and Corrective Action Taken to Prevent Recurrence:** The Supplier shall provide the cause of the non-conforming condition and corrective action taken or that will be taken by the Supplier to prevent recurrence. Corrective action related to operator error shall identify the number of similar deviations that this operator has been responsible for, on this order, within the past six (6) month period. If the corrective action has not yet been completed, a date should be identified for completion of the corrective action.
24	**Previous RAR/DSRs of the Same Non-Conforming Condition:** The Supplier shall provide a list by submittal number of all DSRs/RARs previously issued on the part(s) (i.e., same serial numbers) covered by this request as well as other current contracts for the same type of equipment. Also, include those DSRs/RARs under review by FMP.
25	**Recommended Change to Technical Requirements:** The Supplier shall identify whether a change to technical requirements will be recommended to prevent recurrence including the scheduled date for submitting the recommendation. Any recommended change shall be submitted in the appropriate form (e.g., as an REC) with the necessary technical support.
	Additional Information: When additional sheets are required, clearly identify each sheet as applicable to the DSR, provide the applicable Block Name of supplemental information, and number all pages consecutively starting with page 2.

VII. FORM P-345 COORDINATED PROCEDURE REVIEW SYSTEM (CPRS) PROCEDURE COVER SHEET

A Form P-345 CPRS Procedure Cover Sheet is initiated by the Supplier for the purpose of requesting a review of a procedure through CPRS. The CPRS Cover Sheet shall be prepared by the Supplier and submitted to FMP in accordance with the following instructions. The numbered blocks on the P-345 correspond with the block numbers in Table 6.

Table 6: Form P-345 Coordinated Procedure Review System (CPRS) Procedure Cover Sheet

Block	Information to be Provided
1	**Submitting Supplier:** Enter the full company name of the Supplier submitting the procedure.
2	**Supplier of Procedure and Address:** Enter the full company name and address of the Supplier that is submitting the procedure. If a first-tier Supplier is submitting a procedure for a sub-tier Supplier, enter the sub-tier's full company name and address here.
3	**Procedure Number, Revision, and Date:** Enter the procedure number, revision, and date of the procedure being submitted for review.
4	**Procedure Type:** Enter the type of procedure that is being submitted for review (e.g., liquid penetrant, alloy identity, welding, etc.).
5	**Addenda/Attachments/Supplements, Number, Revision, and Date:** Enter the name, number, revision, and date of any supplemental documents that are being submitted with the procedure.
6	**Is This Procedure Being Submitted For Use in Component or Core Area?** Leave this area blank since this type of information is for BPMI use only.
7	**Specification/Document, Revision, and Date:** Enter the specification or document, revision, and date of that specification or document.
8	**Component/Product Form of Applicability:** Enter the types of components in which the procedure can be used.
9	**Other Limitations of Applicability:** Enter any limitations of the applicability of the procedure.
10	**Submitter's Name, Title, and Phone Number:** Enter the name, job title, and phone number of the person submitting the CPRS procedure for review.