Dear Auditors,

During a recent ANAB witness audit, the following issues were identified:

1) A piece of test equipment had a calibration decal that indicated it was past due for calibration (September 2013 calibration due date). Although “ABC Company” was able to produce calibration certification (dated 9/20/13) for the piece of test equipment, this test equipment was continuously utilized since September 2013 with no notice of this condition. ABC Company’s process clearly was not in conformance with their process requirements and left the potential for other test or product acceptance equipment having the same issue. A nonconformance was not raised on this issue.

2) During the audit of ABC Company’s Provision of Resources (Training) process on day 2, it was clear through the auditors interview and records provided by ABC that the organization had not determined the necessary competence of personnel (AS9100C 6.2.2 a.), which did not provide a basis for determining the necessary training necessary to achieve the determined competence (AS9100C 6.2.2 b.), did not have records to indicate any method of evaluating the effectiveness of actions taken (AS9100C 6.2.2 c.), & did not maintain appropriate records of training (AS9100C 6.2.2 d.). Records of training were simple printed forms with nothing more than the title of
training, trainer, & trainee with no indication of acknowledgement by the trainer or trainee, which provided little confidence that there was ever any interaction between the trainer & trainee. *The PRI auditor did not raise a nonconformance on this clearly nonconforming condition.*

3) During the audit of ABC Company’s Manufacturing Processes, the auditor observed repair and/or servicing activity being performed on ABC’s Halo Hole Finder. Upon further questioning by the auditor, it was revealed that a customer sent the unit to ABC for troubleshoot & repair. The auditor was told that it was a special project and that ABC’s servicing processes did not really apply (Coordinate Customer Service process & Service Customer Products). There was no documentation indicating any control over this activity. *The verbal information provided by ABC was not verified to become audit evidence to show conformance to requirements (to AS9100C and to ABC procedure).*

4) During the audit of ABC Company’s Manufacturing Processes, the auditor observed an inspection of holes that were drilled into swaged push/pull rod ends (2 holes per end). The inspector was observed not being able to insert the “Go” gage into one of the holes, after which he segregated the rod from the others. Upon returning to the inspection office to stamp off the inspection operation, the inspector indicated that all rods were accepted, with no rejections. The auditor inquired about the one rod that appeared to fail, and the inspector stated that they were all good. *This verbal information provided by the ABC inspector was not verified to become audit evidence to show conformance to requirements (e.g. drawing, specification, etc...), which was directly related to product (potential for shipping nonconforming product).*

The ANAB auditor wrote an NCR to PRI Registrar against ISO 17021:2011 clause 9.1.9.5.1 – “During the audit, information relevant to the audit objectives, scope and criteria (including information relating to interfaces between functions, activities and processes) shall be collected by appropriate sampling and verified to become audit evidence.”
The results of our investigation show that the PRI auditor simply, but incorrectly, rationalized in his own mind that the follow-up as provided by the client during the audit eased the necessity to issue nonconformances for these issues. PRI Registrar, as well as industry, perceives this in the same manner as soft-grading.

We wanted to take this opportunity to emphasize the importance of collecting information and documenting all potential issues. *If there is any doubt whatsoever regarding a client’s conformance to requirements, it is always better to document the issue than to potentially allow a questionable response to slide.* Clients always have the ability to appeal any NCR that is identified.

Thank you for your time and consideration regarding this matter.