Quality Manual

ISO-9001

Netherland Rubber Company
2931 Exon Avenue
Cincinnati, OH 45241

QUALITY POLICY

Netherland Rubber Company is committed to increasing sales, meeting customer requirements profitably, and achieving world class customer satisfaction through continuous improvement and a Quality Management System of ISO-9001.

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DISTRIBUTION LIST

	Name & Title
Original	**(QMR)**
All Others	**Available to all employees**

CHANGE HISTORY RECORD

REV.:	***DATE:***	***REASON FOR CHANGE:***	***APPROVED:***	***TITLE:***
11	**9/18/02**	**Total re-write to meet the intent of ISO-9001**	**RAP TDC**	**QMR CEO**
12	**6/16/03**	**Change of Quality Policy**	**RAP TDC**	**QMR CEO**
13	**11/10/09**	**Changed ISO-9001:2000 to ISO-9001**	**RAP TDC**	**QMR CEO**

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SECTION 4, QUALITY MANAGEMENT SYSTEM

4.1 ***General Requirements***

4.1.1 Netherland Rubber Company' (NRC) quality management system has been established, documented, implemented, and maintained as a way to continually improve the effectiveness of our organization. The Quality Manual describes our quality policy and general company-wide structure and procedures for maintaining the quality management system (QMS) that meets the requirements of ISO-9001.

4.1.2 NRC' quality management system is based upon a process approach to quality management, demonstrated by our commitment to:

a) Identify the processes needed for the effective operation of our quality management system and their application throughout NRC,
b) Determine the sequence and interaction of our quality management system processes,
c) Determine the criteria and methods needed to ensure the effective operation and control of these processes,
d) Ensure the availability of resources and information necessary to support the operation and monitoring of these processes,
) Monitor, measure and analyze these processes, and
) Implement action necessary to achieve planned results and continual improvement.

4.1.3 NRC manages these processes in accordance with the requirements of ISO 9001.

4.1.4 NRC maintains control over all outsourced processes that affect product conformity with requirements and/or the quality management system. Methods for control are identified in Section 7.4 (Purchasing) and in documented procedures, where appropriate. At the present time there are no outsourced QMS processes at NRC, but if that is ever the case, they will be identified in the quality management system.

4.2 ***Documentation Requirements***

4.2.1 General NRC' quality management system documentation includes:

- **a)** Documented statements of a quality policy and quality objectives,
- **b)** This Quality Manual,
- **c)** Documented procedures required by ISO-9001,
- **d)** Documents needed by the NRC to ensure the effective planning, operation, and control of its processes, and
- **e)** Records required by ISO-9001 (see 4.2.4).

4.2.1.1 The following four levels of documentation are utilized and maintained to meet the requirements of ISO 9001 and, where it is necessary, to ensure adequate control.

Level 1: Quality Manual The Quality Manual includes NRC' quality policy, quality objectives and the general company-wide structure, scope and methods for maintaining the quality management system, including application of requirements. The Quality Manual references the related quality management Organizational Chart **(APP-1)**, QMS Interrelationship **(APP-2)** and system procedures, which are followed to meet the specified policies and approaches.

Level 2: Operating Procedures Documented procedures are used to specify who does what, when it is performed, and what documentation is used to verify that the quality activity was executed as required.

Level 3: Work Instructions Work instructions and Training Attachments are used by NRC to detail how particular tasks are to be performed where the absence of such instructions would adversely affect quality.

Level 4: Records and Forms Records are used by NRC to provide assurance and evidence that the required product quality was achieved, and that the company's quality management system has been implemented correctly. Forms refer to orders, tags, labels, stickers, pre-printed sheets, stamps, and other means to identify the status of materials and product used in the company to achieve the specified requirements.

4.2.2 ***Quality Manual*** At NRC, the Quality Manual is the Level I document of our quality management system. In our Quality Manual, we describe the scope of the quality management system and reference documented procedures necessary to meet the specified polices and approaches utilized by NRC. The interactions between the various departments within the quality system processes are defined within the procedures, work instructions, forms, and at appropriate sections of this Quality Manual.

4.2.2.1 The Quality Manual is a controlled document that is reviewed and approved by top management.

1.0.0.0 Exclusion of any clauses in ISO-9001 will be documented in the appropriate ISO clauses of this Quality Manual. At the present time, Netherland Rubber Company is not responsible for Design and Development for product it manufactures. All product is designed by our customer.

4.2.3 ***Control of Documents*** Documents required by the quality management system will be controlled. Records are a special type of document and will be controlled according to the requirements given in 4.2.4.

4.2.3.1 Procedures have been established to define the controls needed to:

a) Approve documents for adequacy prior to issue,
b) Review and update as necessary and re-approve documents,
c) Ensure that changes and the current revision status of documents are identified,
d) Ensure that relevant versions of applicable documents are available at points of use,
e) Ensure that documents remain legible and readily identifiable,
f) Ensure that documents of external origin are identified and their distribution controlled, and
g) Prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

4.2.3.2 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Document Control. **OP-32: Document Control**

4.2.4 ***Control of Records*** Quality records will be established and maintained to provide evidence of conformity to requirements and of the effective operation of the quality management system. Records will remain legible, readily identifiable, and retrievable. A documented procedure will be established to define the controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records.

4.2.4.1 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to the Control of Quality Records. **OP-73: Quality Records**

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SECTION 5, MANAGEMENT RESPONSIBILITY

5.1 ***Management Commitment*** Top Management will provide evidence of its commitment to the development and implementation of the quality management system and continually improving it's effectiveness by:

a) Communication to NRC employees the importance of meeting customer as well as statutory and regulatory requirements, (if applicable),
b) Establishing the quality policy,
c) Ensuring that quality objectives are established.
d) Conducting management reviews, and
e) Ensuring the availability of resources

5.2 ***Customer Focus*** Top management will ensure that customer requirements are determined and are met with the aim of enhancing customer satisfaction by:

a) Soliciting customer satisfaction and any dissatisfaction.
a) Reviewing the performance of design, manufacture and distribution of our products.

5.3 ***Quality Policy*** Top management will ensure that the quality policy:

a) Is appropriate to the purpose of NRC,
b) Includes a commitment to comply with ISO-9001 and continually improve the effectiveness of the quality management system,
c) Provides a framework for establishing and reviewing quality objectives,
d) Is communicated and understood within NRC, and
e) Is reviewed for continuing suitability on an annual basis during one of our Management Review meetings.

5.4 ***PLANNING***

5.4.1 ***Quality Objectives*** Top management will ensure that quality objectives, including those needed to meet requirements for product (see 7.1.a), are established at relevant functions and levels within NRC. The quality objectives will be measurable and consistent with the quality policy. Some examples of Quality Objectives include but are not limited to:

a) Increasing Sales,
b) Reduce RGA's,
c) Continual Improvement projects in production and office,
d) On-Time Delivery, and
e) Customer Satisfaction.

5.4.2 ***Quality Management System Planning***
Top management will ensure that:

a) The planning of the quality management system is carried out in order to meet the requirements given in 4.1, as well as the quality objectives, and
b) The integrity of the quality management system is maintained when changes to the quality management system are planned and implemented.

5.5 *RESPONSIBILITY, AUTHORITY AND COMMUNICATION*

5.5.1 ***Responsibility and Authority*** Top management will ensure that responsibilities and authorities are defined and communicated within NRC:

a) The organizational structure shown in APP-1 illustrates the responsibilities and authorities of personnel who manage, perform, and verify work affecting the quality of "Promotional Magnetic an d Non-Magnetic Products" at NRC.

b) The **V.P. Operations** is the leader of the quality efforts at NRC and is responsible for the delegation of the various responsibilities for quality, and for the efficient operation of NRC.

c) The **Department Managers** are responsible for the operation of the functions that report to them. These responsibilities include both daily operations and strategic and tactical planning. They must ensure that NRC' quality policies are effectively operating in their functions and being carried out on a daily basis.

5.5.2 ***Management Representative*** The V.P. of NRC has been appointed ISO Management Representative and, irrespective of other responsibilities, will have responsibility and authority that includes:

a) Ensuring that processes needed for the quality management system are established, implemented, and maintained,
b) Reporting to top management on the performance of the quality management system and any need for improvement, and
c) Ensuring the promotion of awareness of customer requirements throughout NRC.

5.5.3 ***Internal Communication*** Top management will ensure that appropriate communication processes are established within NRC and that communication takes place regarding the effectiveness of the quality management system. It is also an opportunity to identify areas of needed improvement. Some examples of Internal Communication include but are not limited to:

a) Benchmarking data comparing NRC to our competition
b) Results of Management Review Meetings
c) Performance Reviews and targets

5.6 ***Management Review***

5.6.1 ***General*** Top management (i.e. V.P., QMR, DCM, and Department Mangers) will review NRC' quality management system, minimum of twice per year, to ensure it's continuing suitability, adequacy, and effectiveness. This review will include assessing opportunities for improvement and the need for changes to the quality management system, including the quality objectives. Records from management reviews will be maintained (see 4.2.4) by the Document Control Manager on form 5.6.1.F.

5.6.2 ***Review Input*** The input to management review will include information on:

a) Follow-up actions from previous management reviews,
b) Results of audits, (internal and/or external as applicable)
c) Customer feedback,
d) Process performance and Product conformity,
e) Status of preventive and corrective actions,
f) Changes that could affect the quality management system, and
g) Recommendations for improvement.

5.6.3 ***Review Output*** The output from management review will include any decisions and actions related to:

a) Improvement of the effectiveness of the quality management system and its processes,
b) Improvement of Product related to customer requirements, and
c) Resource needs.

SECTION 6, RESOURCE MANAGEMENT

6.1 ***Provision of Resources***

NRC will determine and provide the resources needed to:

a) Implement and maintain the quality management system and continually improve its effectiveness, and
b) Enhance customer satisfaction by meeting customer requirements.

6.2 ***Human Resources***

6.2.1 ***General*** Personnel performing work at NRC affecting product quality will be competent on the basis of appropriate education, training, skills, and experience.

6.2.2 ***Competence, Awareness and Training*** NRC will:

a) Determine the necessary competence for personnel performing work affecting product quality,
b) Provide training or take other actions to satisfy these needs,
c) Evaluate the effectiveness of the actions taken utilizing resources such as Audits, Observations, Testing, Performance Evaluation, Trend Analysis, and Customer Complaints.
d) Ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality objectives, and
e) Maintain appropriate records of education, training, skill, and experience (see 4.2.4).

6.2.2.1 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Competence, Awareness, and Training. **OP-75: Training**

6.3 ***Infrastructure*** NRC will determine, provide, and maintain the infrastructure needed to achieve conformity to product requirements.

1.0.0 Suitable maintenance of equipment shall be controlled through the use of Maintenance Instructions, Schedules and Records.

2.0.0 Original copies of Maintenance Instructions, Schedules and Records shall be kept by the NRC Document Control Manager.

3.0.0 Production and Receiving / Shipping departments shall have copies of their respective Maintenance Instructions, Schedules and Records and be responsible for having maintenance performed and updating schedules and records.

4.0.0 Infrastructure includes but is not limited to:

a) Buildings, workspace and associated utilities,
b) Computer System Back-Up, and
c) Supporting services (such as transport or communication)

6.3.5 ***Supporting Manual*** The following manual provides additional detail for methods, responsibilities, and documentation related to Preventive Maintenance. **Suitable Maintenance Program Manual (see Document Control Manager)**

6.4 ***Work Environment*** NRC will determine and manage the work environment needed to achieve conformity to product requirements. Opportunities for evaluating the work environment may include but are not limited to:

a) Physical factors such as cleanliness, lighting, and pollution, and
b) Following established Safety Rules.

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SECTION 7, PRODUCT REALIZATION

7.1 ***PLANNING OF PRODUCT REALIZATION*** NRC will plan and develop the processes needed for product realization. Planning of product realization will be consistent with the requirements of the other processes of the quality management system (see 4.1). In planning product realization, NRC will determine the following, as appropriate per the requirements of written procedures:

a) Quality objectives and requirements for the product,
b) The need to establish processes, documents, and provide resources specific to the product or service,
c) Required verification, validation, monitoring, and inspection & test activities specific to the product and the criteria for product acceptance,
d) Records needed to provide evidence that the realization processes and resulting product meet requirements (see 4.2.4).

1.0.0 The output of this planning will be in a form suitable for NRC' method of operations.

7.2 ***CUSTOMER RELATED PROCESSES***

7.2.1 ***Determination of Requirements Related to the Product***
NRC will determine:

a) Requirements specified by the customer, including the requirements for delivery and post-delivery activities,
b) Requirements not stated by the customer but necessary for specified or intended use, where known,
c) Statutory and regulatory requirements (if applicable) related to the product, and
d) Any additional requirements determined by NRC

7.2.1.1 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Contract Review. **OP-5: Contract Review**

7.2.2 ***Review of Requirements Related to the Product*** NRC will review the requirements related to the product. This review will be conducted prior to NRC' commitment to supply "Advertising Specialty & Promotional Magnetic Product" to the customer (e.g. submission of tenders, acceptance of contracts or orders, acceptance of changes to contracts or orders) and will ensure that:

a) Product requirements are defined,
b) Contract or order requirements differing from those previously expressed are resolved,
c) NRC has the ability to meet the defined requirements.
d) Records of the results of the review and actions arising from the review are maintained (see 4.2.4),
e) Where the customer provides no documented statement of requirements, the customer requirements will be confirmed by NRC before acceptance, and
f) Where product requirements are changed, NRC will ensure that relevant documents are amended and that relevant personnel are made aware of the changed requirements.

7.2.2.1 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Contract Review Requirements. **OP-5: Contract Review**

7.2.3 ***Customer Communication*** NRC will determine and implement effective arrangements for communicating with customers in relation to:

a) Product information,
b) Enquiries, contracts or order handling, including amendments, and
c) Customer feedback, including customer complaints.

7.2.3.1 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Customer Communication. **OP-5: Contract Review, OP-2: Customer Complaints and RGA's.**

7.3 ***DESIGN AND DEVELOPMENT*** Design and Development at NRC is not applicable.

7.4 ***PURCHASING***

7.4.1 ***Purchasing Process*** NRC will ensure that purchased product conforms to specified purchase requirements. The type and extent of control applied to the supplier and the purchased product shall be dependent upon the effect of the purchased product on subsequent product realization or the final product.

7.4.1.1 NRC will evaluate and select suppliers based on their ability to supply product in accordance with NRC' requirements. Criteria for selection, evaluation, and re-evaluation will be established. Records of the results of evaluations and any necessary actions arising form the evaluation will be maintained (see 4.2.4).

7.4.1.2 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Sub-Contractor Evaluation. **OP-36: Purchasing**

7.4.2 ***Purchasing Information*** Purchasing information will describe the product to be purchased, including where appropriate:

a) Requirements for approval of product, procedures, processes and equipment,
b) Requirements for qualification of personnel, and
c) Quality management system requirements.

7.4.2.1 NRC will ensure the adequacy of specified purchase requirements prior to their communication to the supplier.

7.4.2.2 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Purchase Orders. **OP-36: Purchasing**

7.4.3 ***Verification of Purchased Product*** NRC will establish and implement the inspection or other activities necessary for ensuring that purchased product meets specified purchase requirements.

7.4.3.1 Where NRC or its customer intends to perform verification at the supplier's premises, NRC will state the intended verification arrangements and method of product release in the purchasing information.

7.4.3.2 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Verification of Purchased Product. **OP-36: Purchasing, OP-61: Receiving, Warehousing and Shipping**

7.5 ***PRODUCTION AND SERVICE PROVISION*** Servicing is not applicable to NRC.

7.5.1 ***Control of Production*** NRC will plan and carry out Production under controlled conditions. Controlled conditions will include, as applicable:

a) The availability of information that describes the characteristics of the product,
b) The availability of work instructions, as necessary,
c) The use of suitable equipment,
d) The availability and use of monitoring and measuring devices,
e) The implementation of monitoring and measurement, and
f) The implementation of release, delivery and post-delivery activities.

7.5.1.1 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Production Control. **OP-55: Production, OP-61: Receiving, Warehousing and Shipping**

7.5.2 ***Validation of Processes for Production*** Validation of Processes for Production at NRC is not applicable.

7.5.3 ***Identification and Traceability*** Where appropriate, NRC will identify the product by suitable means throughout production. The various departmental procedures specify product identification requirements as applicable.

7.5.3.1 NRC will identify the product status with respect to the monitoring and measurement requirements.

7.5.3.2 Where traceability is a requirement, NRC will control and record the unique identification of the product (see 4.2.4) per the requirements of procedure **OP-61, Receiving, Warehousing and Shipping.**

7.5.4 ***Customer Property*** NRC will exercise care with customer property while it is under our control or being used. NRC will identify, verify, protect and safeguard customer property provided for use or incorporation into the product. If any customer property is lost, damaged or otherwise found to be unsuitable for use, this will be reported to the customer and records maintained (see 4.2.4).

7.5.5 ***Preservation of Product*** NRC will preserve the conformity of product during internal processing and delivery to the intended destination. This preservation will include identification, handling, packaging, storage and protection. Preservation will also apply to the constituent parts of the product.

7.5.5.1 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Preservation of Product. **OP-61: Receiving, Warehousing and Shipping**

7.6 ***Control of Monitoring and Measuring Devices*** NRC will determine the monitoring and measurement to be undertaken and the monitoring and measuring devices needed to provide evidence of conformity of product to determined requirements (see 7.2.1).

7.6.1 NRC will establish processes to ensure that monitoring and measurement can be carried out and are carried out in a manner that is consistent with the monitoring and measurement requirements. Where necessary to ensure valid results, measuring equipment will be:

a) Calibrated or verified at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; where no such standards exist, the basis used for calibration or verification will be recorded,
b) Adjusted or re-adjusted as necessary,
c) Identified to enable the calibration status to be determined,
d) Safeguarded from adjustments that would invalidate the measurement result,
e) Protected from damage and deterioration during handling, maintenance, and storage.

7.6.2 In addition, NRC will assess and record the validity of the previous measuring results when the equipment is found not to conform to requirements. NRC will take appropriate action on the equipment and any product affected. Records of the results of calibration and verification will be maintained (see 4.2.4).

1.0.0 When used in the monitoring and measurement of specified requirements, the ability of computer software to satisfy the intended application will be confirmed. This will be undertaken prior to initial use and reconfirmed as necessary.

7.6.4 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Calibration. **OP-63: Calibration of Measuring Equipment**

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SECTION 8, MEASUREMENT, ANALYSIS & IMPROVEMENT

8.1 ***General*** NRC will plan and implement the monitoring, measurement, analysis and improvement processes needed to:

a) Demonstrate conformity of the product,
b) Ensure conformity of the quality management system, and
c) Continually improve the effectiveness of the quality management system.

1.0.0 This will include determination of applicable methods, including statistical techniques, and the extent of their use. Some areas for monitoring, measurement, and analysis include but are not limited to:

a) Increasing Sales,
b) Reduce RGA's,
c) Continual Improvement projects in production and office,
d) On-Time Delivery, and
e) Customer Satisfaction.

8.2 *MONITORING AND MEASUREMENT*

8.2.1 ***Customer Satisfaction*** As one of the measurements of the performance of the quality management system, NRC will monitor information relating to the customer perception as to whether NRC has met customer requirements. The methods for obtaining and using this information will be determined.

8.2.1. ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Customer Satisfaction.
OP-2: Customer Complaints and RGA's

8.2.2 ***Internal Audit*** NRC will conduct internal audits at planned intervals to determine whether the quality management system:

a) Conforms to the planned arrangements (see 7.1), to the requirements of this International Standard and to the quality management system requirements established by NRC, and
b) Is effectively implemented and maintained.

8.2.2.1 An audit programme will be planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency and methods will be defined. Selection of auditors and conduct of audits will ensure objectivity and impartiality of the audit process. Auditors will not audit their own work.

8.2.2.2 The responsibilities and requirements for planning and conducting audits, and for reporting results and maintaining records (see 4.2.4) will be defined in a documented procedure.

8.2.2.3 The management responsible for the area being audited will ensure that actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities will include the verification of the actions taken and the reporting of verification results (see 8.5.2).

8.2.2.4 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Internal Auditing. **OP-74: Internal Quality Audits**

8.2.3 ***Monitoring and Measurement of Processes*** The Quality System processes defined in this manual shall be monitored by the Quality Management Representative to ensure they are effective in meeting the planned results.

8.2.3.1 The monitoring of Quality System processes is achieved by reviewing Internal Audit results, Nonconformance reports, and Management Reviews. When areas of concern are identified, corrective action will be initiated.

8.2.3.2 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Monitoring and Measurement of Processes.

a) Management Review: QAM, para 5.6
b) Internal Quality Audits: OP-74
c) Nonconforming Product: OP-64

8.2.4 ***Monitoring and Measurement of Product*** NRC will monitor and measure the characteristics of the product to verify that product requirements have been met. This will be carried out at appropriate stages of the product realization process in accordance with the planned arrangements (see 7.1).

8.2.4.1 Evidence of conformity with the acceptance criteria will be maintained. Records will indicate the person(s) authorizing release of product (see 4.2.4).

1.0.0.0 Product release and delivery will not proceed until the planned arrangements (see 7.1) have been satisfactorily completed, unless otherwise approved by a relevant authority and, where applicable, by the customer.

8.2.4.3 ***Supporting Procedures*** The following procedures provide additional detail for methods, responsibilities, and documentation related to Monitoring and Measurement of product.

a) Receiving, Warehousing and Shipping: OP-61
b) Production: OP-55

8.3 ***Control of Nonconforming Product*** NRC will ensure that product which does not conform to product requirements is identified and controlled to prevent its unintended use or delivery. The controls and related responsibilities and authorities for dealing with nonconforming product will be defined in a documented procedure.

8.3.1 NRC will deal with nonconforming product by one or more of the following ways:

a) By taking action to eliminate the detected nonconformity;
b) By authorizing its use, release or acceptance under concession by a relevant authority and, where applicable, by the customer; and
c) By taking action to preclude its original intended use or application.

1.0.0 Records of the nature of nonconformities and any subsequent actions taken, including concessions obtained, will be maintained (see 4.2.4).

2.0.0 When nonconforming product is corrected it shall be subject to re-verification to demonstrate conformity to the requirements.

3.0.0 When nonconforming product is detected after delivery or use has started, NRC will take action appropriate to the effects, or potential effects, of the nonconformity.

8.3.5 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to N/C product. **OP-64: Non-Conforming Product**

8.4 ***Analysis of Data*** NRC will determine, collect, and analyse appropriate data to demonstrate the suitability and effectiveness of the quality management system and to evaluate where continual improvement of the effectiveness of the quality management system can be made. This will include data generated as a result of monitoring and measurement and from other relevant sources. The analysis of data will provide information relating to:

a) Customer satisfaction and/or dissatisfaction (see 8.2.1),
b) Conformity to product requirements (see 7.2.1),
c) Characteristics and trends of processes and products including opportunities for preventive action, and
d) Supplier performance.

8.5 ***IMPROVEMENT***

8.5.1 ***Continual Improvement*** NRC will continually improve the effectiveness of the quality management system through the use of the quality policy, quality objectives, audit results, analysis of data, corrective and preventive actions and management review. Improvements can range from small step ongoing continual improvement to strategic breakthrough improvement projects. These improvements may result in change to the product or processes and even to the quality management system or to the company.

8.5.2.1 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Continual Improvement. **OP-65: Corrective / Preventive Action & C/I**

8.5.2 ***Corrective Action*** NRC will take action to eliminate the cause of nonconformities in order to prevent recurrence. Corrective actions will be appropriate to the effects of the nonconformities encountered. Procedures will be established to define requirements for:

a) Reviewing nonconformities (including customer complaints),
b) Determining the causes of nonconformities,
c) Evaluating the need for action to ensure that nonconformities do not recur,
d) Determining and implementing action needed,
e) Records of the results of action taken (see 4.2.4), and
f) Reviewing corrective action taken.

8.5.2.1 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Corrective/Preventive Action. **OP-65: Corrective / Preventive Action & C/I**

8.5.3 ***Preventive Action*** NRC will determine action to eliminate the causes of potential nonconformities in order to prevent their occurrence. Preventive actions will be appropriate to the effects of the potential problems. Procedures will be established to define requirements for:

a) Determining potential nonconformities and their causes,
b) Evaluating the need for action to prevent occurrence of nonconformities,
c) Determining and implementing action needed,
d) Records of results of action taken (see 4.2.4), and
e) Reviewing preventive action taken.

8.5.3.1 ***Supporting Procedures*** The following procedure provides additional detail for methods, responsibilities, and documentation related to Corrective/Preventive Action. **OP-65: Corrective / Preventive Action & C/I**