QRS-107

Management of Non-Conformance, Deviation Permit and Continued Airworthiness

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Issue Date: April 2015, December 2014
Issue: 00
CHANGES LOG

<table>
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<th>Approval Date</th>
<th>Main changes</th>
<th>Interested Paragraphs</th>
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<td>00</td>
<td>April 2015</td>
<td>First Issue</td>
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REFERENCE DOCUMENTS

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<thead>
<tr>
<th>Documents level</th>
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1 Scope

This Quality instruction defines the methods which shall be used by AgustaWestland (AW) suppliers for the notification of “Non-Conformances” regarding material, Articles and assemblies destined to AW.

2 Applicability

This Quality Instruction is applicable to all AW Suppliers who deliver articles and/or assemblies, or perform operations on Articles or assemblies which are intended for installation or delivered as equipment in furtherance of any programme or contractual requirements.

This procedure applies to all the Legal Entities of AgustaWestland, where a non-conformity could be raised during the manufacturing process, including at supplier facilities.

It shall be used as base reference also for NH90 and AW609; in this case it can be integrated by specific programme procedures, in this case the program procedure prevails.

3 Effective date

July 2015.

4 Ownership

The Supplier Quality Assurance (SQA) is responsible for coordinating the input of content to this QRS and any subsequent amendments supported by other relevant Departments/Functions as required.

5 Acronyms, definitions and abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
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<tbody>
<tr>
<td>ATE</td>
<td>Authorized Technical Expert</td>
</tr>
<tr>
<td>AW</td>
<td>AgustaWestland Engineering Organization</td>
</tr>
<tr>
<td>AWPO</td>
<td>AgustaWestland Production Organization</td>
</tr>
<tr>
<td>CORIPRO</td>
<td>Commissione Riesame Prodotto</td>
</tr>
<tr>
<td>CoC</td>
<td>Certificate of Conformity</td>
</tr>
<tr>
<td>CO</td>
<td>Concession (Waiver)</td>
</tr>
<tr>
<td>CoMo</td>
<td>Coordination Memo</td>
</tr>
<tr>
<td>CPE</td>
<td>Chief Project Engineer</td>
</tr>
<tr>
<td>DP</td>
<td>Deviation Permit</td>
</tr>
<tr>
<td>HDO</td>
<td>Head of Design Organisation</td>
</tr>
<tr>
<td>ME</td>
<td>Manufacturing Engineering</td>
</tr>
<tr>
<td>MoD</td>
<td>Ministry of Defence</td>
</tr>
<tr>
<td>MP&amp;C</td>
<td>Material Planning &amp; Control</td>
</tr>
<tr>
<td>MRB</td>
<td>Material Review board</td>
</tr>
<tr>
<td>NC</td>
<td>Non Conformity</td>
</tr>
<tr>
<td>QC</td>
<td>Quality Control</td>
</tr>
<tr>
<td>QN</td>
<td>Quality Notification</td>
</tr>
<tr>
<td>RWO</td>
<td>Repair Work Order</td>
</tr>
</tbody>
</table>
ATE
Person, appointed by the HDO, with the authority to classify the concessions and sign the dispositions in accordance with the requirements defined in Appendix A of the present document.

Concession (ref. EN ISO 9000)
Permission granted to a supplier to use or release a product that does not conform to specified requirements.

Coordinator
Inspector authorized to issue a concession.

Known Repair
Repair whose criteria:
- are contained in AW technical specification (e.g. STA, STAP, Repair manuals, etc.) applicable to the product line involved, that has been approved by the HDO or by the competent CPE, or
- have already been applied at least once to the P/N involved (a previous concession exists with specified repair approved by the competent CPE, in which the repair criteria have been described or a repair drawing in accordance with applicable procedure (e.g. NTA047R, WDM4192), has been quoted).

Specific Repair
Repair not covered by the known repair definition.

Performance
Characteristic of a part which impacts the operation of the aircraft.

Strength
Characteristic of a part that affects the structural safety margins and limits the use of the part in the framework of its operation.

Life or Duration
Characteristic of a part that affects the life/duration of the part, reducing it below the period envisaged as a part/specification requirement.

Reliability
Characteristic of the part that affects the product reliability requirements with a consequent increase in the frequency of the scheduled inspection and/or removal intervals, compared with what is contained in technical publications.

Maintainability
Characteristic of the part that has an impact on the maintenance activity envisaged by the scheduled inspections manual.

Testability
Characteristic of the part that has an impact on the ability of the part to reveal and isolate a fault and/or characteristic of the parameters detected on the basis of the test procedures envisaged by the applicable technical publications.

**Interchangeability**
Situation where two or more items are so similar in functional and physical characteristics that they are considered equivalent in performance and durability. Each is capable of replacing the other(s) without causing a need for alteration or adjustment to fulfil the same requirement.

For general definitions, please refer to EN ISO 9000 and to specific documents of Legal Entities, where applicable.

**MRB**
Official Board made up of the AW and Official Authorities and/or the Customer, tasked with the review, evaluation and disposal of non-conforming supplies and services and with ensuring all actions necessary to prevent a repetition of the discrepancies have been taken and are being implemented.

**Non-Conformance**
For the purpose of this procedure, Non-Conformance means a defect which cannot be removed by additional work processes, without deviating from the requirements contained in the technical documentation, but which can't be considered as scrap.

**Concession (Waiver)-CO**
This is the permission granted to a Supplier to use or release a limited quantity of material, components or equipment already produced but not conforms to the applicable “Built Standard” and/or detail drawings.

**Deviation Permit –DP**
A DP is issued when the Supplier asks authorisation either prior to manufacture of an item or to procure a service to deviate from a specification or requirement for a specific number of units, for a specific service or for an established time.

### 6 Means of Understanding
The use of *shall, should, must, will* and *may* within this document *shall* observe the following rules:

- The word *shall* in the text denotes a mandatory requirement: deviations from such a requirement is not permissible without formal agreement,

- The word *should* in the text denotes a recommendation or advice on implementing such a requirement of the document; such recommendations or advice is expected to be followed unless good reasons are stated for not doing so,

- The word *must* in the text is used for legislative or regulatory requirements and *shall* be complied with,
➢ the word *will* in the text denotes a provision or service or an intention in connection with a requirement contained in this document,

➢ the word *may* in the text denotes a permissible practice or action; it does not express a requirement contained in this document.

These means of understanding are applicable in the entirety of the document.
7 REQUIREMENTS

7.1 Supplier Organization

All Suppliers shall submit to AW any non-conformity for approval/disposition according to the category of their AW approval.

For the activities and the requirements specified in this document, the Supplier’s Organization shall formally document:

- A process for approval of non-conformities on manufactured Articles
- A process for classifying the severity of the non-conformities and the control of the use of non-conforming products in finished Articles
- A process for continuing airworthiness
- A process for Sub-suppliers management.

According to the category of AW approval the following paragraph applies:

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>PARAGRAPH</th>
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</thead>
<tbody>
<tr>
<td>Manufacturer</td>
<td>9</td>
</tr>
<tr>
<td>Subcontractor</td>
<td>10</td>
</tr>
</tbody>
</table>

7.2 MANAGEMENT OF CONCESSION AND DEVIATION PERMIT

7.2.1 General

If during the production phase a non-conformity/deviation to design data is discovered by the supplier, an application to AW shall be made by submitting a Concession or a Deviation Permit.

In case the non-conformity is detected after production a Concession will be raised.

In case the deviation is prior to manufacturing a Deviation Permit shall be raised. A Deviation Permit shall be used also in the event it will involve a specific number of units or specific service, for an established time of production.

Anytime an item is affected by several non-conformities, the relevant classification will be the highest one assigned among each single non-conformity.

Non-conformities classification and management process shall be performed as follows:

- When the Supplier detects any non-conformity at the end of the manufacturing process, a “Concession” shall be issued using the form in Appendix A. This does not apply to NH90 program for which program procedure QD S000N0805E01 (Concession Procedure) applies.

The following cases are identified:

A. Supplier classified as Manufacturer: the “Concession” form shall be signed by the Supplier’s Design, Quality and Engineering representatives and forwarded to AW Quality.
Control of the AW plant that is destined to receive the part. An engineering evaluation and proposal is requested to the supplier (ref: form QRS.107.F01)

B. Supplier classified as Subcontractor: the “Concession” form shall be signed by Supplier’s Quality representatives and forwarded to the AW Quality Control of the AW plant that is destined to receive the part.

Once approved and classified by AW, the “Concession” will be returned to the supplier, in order to proceed with item delivery; in case of Major classification, the AW “concession” identification code shall be marked on the relevant item.

- When the Supplier needs to ask for a deviation to the approved data, a “Deviation Permit” shall be issued using the form in appendix B. For NH90 program procedure QD S000N0805E01 (Concession Procedure) applies.

7.3 PROCESS FOR MANUFACTURER

7.3.1 Non Conformities Classification and Approval

During production, the supplier shall give evidence of any non-conformity to the applicable technical data, reporting the relevant reference in the "Declaration of Conformity".

The findings shall be managed according to the supplier procedures, recognized by AW.

Except in cases where the supplier decides to scrap the part, the supplier shall:

Classify the non-conformity as:

- "Major" or "Minor", with the concept defined in Appendix C.

And fill the concession form with the corrective actions proposed and/or the decision to use; the form shall be sent for AW approval to AW Quality Control of the AW plant that is destined to receive the part.

Ensure that for all the non-conformities the following are addressed:

- the traceability
- the identification of the root cause is done
- the evidence of management of any corrective actions taken
- Refer on the “Declaration of Conformity” the minor and major non conformities and the applicable repair drawings, attaching a copy of the documentation
- Mark on the equipment/part the Concession or Deviation Permit number in case of a Major Concession

7.4 PROCESS FOR SUBCONTRACTORS

If the Supplier detects a non conformity, the AW approval is required.
A “Concession” shall be issued, using the form QRS.107.F01 without the page dedicated to MANUFACTURER only.

The “Concession” form shall be signed by Supplier’s Quality representatives and forwarded to the AW Quality Control Manager of the AW plant that is destined to receive the effected Articles.

Once approved, the “Concession” will be returned to the supplier, in order to proceed with items delivery; in case the Concession is classified as Major by AW, identification code shall be marked on the relevant item.

7.5 Application of Concession/Deviation Permit Procedure

- Each item can be covered by only one “Concession”, reporting all non conformities identified during the manufacturing process. The same rule shall be followed in case of “Deviation”.
- If an item has non conformities associated both to a DP and a CO, then two forms shall be issued; one for the DP and one for CO.
- Every CO/DP request form revision shall be subjected to a new approval process.

7.5.1 Defect discovered by AW

In case of a non-conformity detected by AW, the affected item will be isolated until the end of evaluation, prior to ship it back to the Supplier.

For all rejected items (including on site repairs) and all the incidents in which the supplied item is involved, the Supplier will receive a Defect Report/Quality Notification.

At the end of investigations, the Supplier shall return to AW the Defect Report/Quality Notification, attaching the investigation report and corrective actions implemented.

7.6 Management of Non-Conforming Products

7.6.1 General requirements

The Supplier shall ensure the compliance with the following requirements:

- “Non-Conforming” item(s) affected by CO/DP shall be duly identified and separated from the items in production until resolution of the pertinent document has been provided;
- the Supplier shall ensure that the “Non-Conforming” item is clearly identified until the final acceptance phase or, in any case, up to the last operation within Supplier’s responsibility;
- Articles and/or assemblies covered by Major Concession shall be marked with the Concession number. In addition to recording on the delivery documentation, a copy of the Concession report shall be included with the shipment;
- the Supplier shall not deliver Articles with pending (open) Concession without AW explicit authorisation, and this status shall be recorded on the delivery documentation (e.g CoC).
7.6.2 Marking requirements

In all cases where the Concession marking is required the Supplier shall:

- Identify the “non-conforming” material, accepted by AW, by marking the Concession number nearby the Part Number (using the same marking method required for the Part Numbering) prior to the delivery to AW, and in any case, after the execution of the finishing treatments; or as mandated by the AW.

- If the marking is required by vibrating pen, Concession number shall be marked at any material processing stage.

7.6.3 Document submission

The AW Department to which the ORIGINAL copy of the Concession form has to be sent in is

**AGUSTAWESTLAND QUALITY CONTROL OF THE RECEIVING PLANT**

The same AW Department is also responsible for returning the copy of the document as released by AW back to the Supplier.

7.7 Non conformities and Continuous Airworthiness

7.7.1 General

In case the Supplier identifies a design or manufacturing defect related to Articles already delivered, then corrective actions shall be taken by the Supplier and AW is to be informed using the most expedient method or as agreed in the dedicated Quality Plan and respecting the following time limits:

- maximum 24h in case of defects that have impact on airworthiness or the safety;
- 1 week in case of defects impacting the qualification or the characteristics of the product;
- maximum 1 month for others cases.

If not differently agreed (for example in the Quality Plan), a Technical Bulletin or an equivalent document shall be sent to the following AW departments to:

- AW HDO
- Product Support
- Quality Control of the plant receiving the part

7.7.2 Non conformities

The Supplier shall periodically record failures and investigations occurred during manufacturing and any testing of the equipment.
Copies of these records shall be made available to AW on request.

In case of recurrence of the same defect, covered by CO/DP, the Supplier shall perform an investigation in order to generate a modification to design or manufacturing process to avoid the non conformity recurrence.

The Supplier shall, on trend basis, establish a system showing the quality level and the defect level through the use of dedicated indicators (KPI) for the purpose of demonstrating the progress obtained in the Quality Improvement.

When required, the Supplier shall provide AW with the defect level and trend reports.

### 7.7.3 On-site Repair

When the Supplier's technical representative repairs items “on-site”, the repaired item shall be released after validation of the repair by the Quality Manager of the Supplier. For this purpose the Quality Manager of the Supplier shall send the above written authorization to AW Quality Control Department of the receiving Plant. All the required delivery documentation (CoC, Log Card, ATR, etc.) shall be reissued and tested by the above-mentioned representative.

The relevant repair report will become an attachment to the applicable “Defect Report”, for information.

### 8 FORMS

The following forms shall be used by the supplier for the management of Concessions and Deviation Permits:

QRS.107.F01 Concessions
QRS.107.F02 Deviation Permits
<table>
<thead>
<tr>
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<th>Date</th>
<th>AW Doc. N.</th>
<th>Purchase Order</th>
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<td>3</td>
<td>4</td>
</tr>
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<td>AW P/N</td>
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<td>S/N / Batch Number</td>
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<td>Description</td>
<td>9</td>
<td>Grade</td>
<td>7</td>
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<td>Manufacturer</td>
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**Defect(s) Description**

14

**Defect(s) Cause**

19

**Corrective Action**

25

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<th>Inspector</th>
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<td>22</td>
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QRS.107.F01 Issue 1 date 19/11/2014
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<td>Safety</td>
<td>☐ yes</td>
<td>☐ yes ☐ no</td>
<td>☐ yes (specify) ☐ no</td>
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<td>Life</td>
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<td>☐ yes ☐ no</td>
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<tr>
<td>Strength</td>
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<td>☐ yes ☐ no</td>
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<tr>
<td>Performances</td>
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<td>☐ yes ☐ no</td>
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<td>Interchangeability</td>
<td>☐ yes</td>
<td>☐ yes ☐ no</td>
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<td>Reliability</td>
<td>☐ yes</td>
<td>☐ yes ☐ no</td>
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<tr>
<td>Maintainability</td>
<td>☐ yes</td>
<td>☐ yes ☐ no</td>
<td></td>
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<tr>
<td>Installability</td>
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<td>☐ yes ☐ no</td>
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<td>Testability</td>
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<td>Only aspect</td>
<td>☐ yes</td>
<td>☐ yes ☐ no</td>
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</table>

**Repair Proposal**

- **Decision to use**
  - ☐ Use repaired with specific repair
  - ☐ Use repaired with known repair
  - ☐ Use as is
  - ☐ Use repaired for tests (see Limitations)
  - ☐ Use as is for tests (see Limitations)
  - ☐ Scrap

**Concession Classification**

- ☐ Major
- ☐ Minor

**Submit after repair**

- ☐ yes
- ☐ no
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<thead>
<tr>
<th>Box Number</th>
<th>Description</th>
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<tbody>
<tr>
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<tr>
<td>2</td>
<td>Date</td>
</tr>
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<td>3</td>
<td>AgustaWestland reference number</td>
</tr>
<tr>
<td>4</td>
<td>Agusta Purchase Order number</td>
</tr>
<tr>
<td>5</td>
<td>Part Number</td>
</tr>
<tr>
<td>6</td>
<td>Serial/Batch Number</td>
</tr>
<tr>
<td>7</td>
<td>Criticality of the part</td>
</tr>
<tr>
<td>8</td>
<td>Revision of the referenced AW technical document (drawing)</td>
</tr>
<tr>
<td>9</td>
<td>Description and name of the part</td>
</tr>
<tr>
<td>10</td>
<td>Total number of manufactured parts</td>
</tr>
<tr>
<td>11</td>
<td>Number of non-conforming parts / assemblies</td>
</tr>
<tr>
<td>12</td>
<td>Manufacturer name</td>
</tr>
<tr>
<td>13</td>
<td>Helicopter Model Number (Eg. A-109, EH-101, etc.)</td>
</tr>
<tr>
<td>14</td>
<td>Detailed description of the defect</td>
</tr>
<tr>
<td>15</td>
<td>Department of the inspector who detected the problem</td>
</tr>
<tr>
<td>16</td>
<td>Name of the inspector who issues the document</td>
</tr>
<tr>
<td>17</td>
<td>Signature of the Inspector who issues the document</td>
</tr>
<tr>
<td>18</td>
<td>Issue date</td>
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<tr>
<td>19</td>
<td>Detailed description of the causes of the defect</td>
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<tr>
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<td>Department of the inspector who detected the problem</td>
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<td>21</td>
<td>Name of the inspector who detected the cause</td>
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<td>22</td>
<td>Signature of the Inspector who detected the cause</td>
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<tr>
<td>Box Number</td>
<td>Description</td>
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<td>------------</td>
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<td>23</td>
<td>Defect cause issue date</td>
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<tr>
<td>24</td>
<td>Corrective Actions foreseen implementation dates</td>
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<td>25</td>
<td>Description of the Corrective Action</td>
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<td>26</td>
<td>Department of the inspector who defined the corrective action</td>
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<tr>
<td>27</td>
<td>Name of the inspector who defined the corrective action</td>
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<tr>
<td>28</td>
<td>Signature of the Corrective Action responsible</td>
</tr>
<tr>
<td>29</td>
<td>Corrective Action issue date</td>
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### DEVIATION PERMIT

<table>
<thead>
<tr>
<th>Manuf. Doc. N.</th>
<th>Date</th>
<th>AW Doc. N.</th>
<th>Purchase Order</th>
<th>AW P/N</th>
<th>S/N / Batch Number</th>
<th>Grade</th>
<th>AW Drawing Issue</th>
<th>Description</th>
<th>Batch Qty</th>
<th>Defective Qty</th>
<th>Manufacturer</th>
<th>Model</th>
<th>Deviation(s) Description</th>
<th>Department</th>
<th>Inspector</th>
<th>Signature</th>
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### Deviation(s) Cause

19

### Effect on costs

<table>
<thead>
<tr>
<th>Department</th>
<th>Inspector</th>
<th>Signature</th>
<th>Date</th>
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### Effect on programme

<table>
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### Effect on delivery

<table>
<thead>
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<th>Department</th>
<th>Inspector</th>
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QRS.107.F02 Issue 1 date 19/11/2014
<table>
<thead>
<tr>
<th>Box Number</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Manufacturer reference number</td>
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<td>2</td>
<td>Date</td>
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<tr>
<td>3</td>
<td>AgustaWestland reference number</td>
</tr>
<tr>
<td>4</td>
<td>Agusta Purchase Order number</td>
</tr>
<tr>
<td>5</td>
<td>Part Number</td>
</tr>
<tr>
<td>6</td>
<td>Serial/Batch Number</td>
</tr>
<tr>
<td>7</td>
<td>Criticality of the part</td>
</tr>
<tr>
<td>8</td>
<td>Revision of the referenced AW technical document (drawing)</td>
</tr>
<tr>
<td>9</td>
<td>Description and name of the part</td>
</tr>
<tr>
<td>10</td>
<td>Total number of manufactured parts</td>
</tr>
<tr>
<td>11</td>
<td>Number of non-conforming parts / assemblies</td>
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<tr>
<td>12</td>
<td>Manufacturer name</td>
</tr>
<tr>
<td>13</td>
<td>Helicopter Model Number (Eg. A-109, EH-101, etc.)</td>
</tr>
<tr>
<td>14</td>
<td>Detailed description of the deviation</td>
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<tr>
<td>15</td>
<td>Department of the inspector who asks for deviation</td>
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<tr>
<td>16</td>
<td>Name of the originator</td>
</tr>
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<td>17</td>
<td>Signature of the originator</td>
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<td>18</td>
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<tr>
<td>19</td>
<td>Detailed description of the causes of the deviation</td>
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<td>Department of the originator who detected the cause of the deviation</td>
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<tr>
<td>21</td>
<td>Name of the originator who detected the cause of the deviation</td>
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<td>22</td>
<td>Signature of the originator who detected the cause of the deviation</td>
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<td>Box Number</td>
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</tr>
<tr>
<td>23</td>
<td>Date</td>
</tr>
<tr>
<td>24</td>
<td>There are impacts on the cost (yes/no)</td>
</tr>
<tr>
<td>25</td>
<td>There are impacts on the programme (yes/no)</td>
</tr>
<tr>
<td>26</td>
<td>There are impacts on the delivery (new delivery date)</td>
</tr>
</tbody>
</table>