



# SAFETY MANAGEMENT MANUAL

## 9.2 NON-CONFORMITIES HANDLING

Originator:	Approved By:
Theophilus Moniz III	Albert F. Suchy

### 1. Purpose

The purpose of this procedure is to set forth the guidelines for the processing of Non-conformities, Observations, Accidents and Hazardous Occurrences, including measures intended to prevent recurrence.

### 2. Responsibility

It is the responsibility of the Director of Ship Operations to ensure that Non-conformities, Observations, Accidents and Hazardous Occurrences identified within the Safety Management System are processed to ensure that this important feedback process results in a safer operation of Woods Hole Oceanographic Institution vessels.

The Director of Ship Operations has designated the Marine Engineer as the Safety Management Representative to monitor Non-conformities, Observations, Accidents and Hazardous Occurrences recorded in the Safety Management System and to initiate measures intended to prevent recurrence.

### 3. General

#### A. Audits

The general processing for Non-conformities and Observations identified during audits is as follows:

- 1) The internal auditor shall enter all Non-conformities and Observations into NS5. In the case of external audits, port office personnel shall enter the report along with the non-conformities and observations provided by the external auditor into NS5.
- 2) The Director of Ship Operations for the company and the Master for the vessel shall enter proposed corrective actions. Corrective actions shall correct the issue with an emphasis to provide measures to prevent recurrence.
- 3) Corrective actions for all vessels shall be reviewed by the Director of Ship Operations to ensure the non-conformity or observation is adequately addressed.
- 4) The Master will sign off corrective actions that have been accomplished or completed by ship personnel in NS5 as they are completed. This must be done after the proposed corrective actions have been reviewed by the Director of Ship Operations.



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- 5) For corrective actions that require non-shipboard personnel to complete, Port Office personnel are expected to complete the corrective action in **NS5**.
- 6) Verification of internal audit non-conformities or observations can be completed by qualified internal auditors. Verification of external audit non-conformities or observations must be completed by the next external auditor. The auditor will sign off that the non-conformity has been verified. The information will then be entered into **NS5** by Port Office Personnel.
- 7) The Safety Management Representative shall be responsible for closing non-conformities and observations in **NS5**.
- 8) For all Port Office audits, the Director of Ship Operations shall determine corrective actions required for all non-conformities and observations noted and shall enter all dates of completion for same. The Safety Management Representative shall close the record in **NS5**.
- 9) It is essential that no step be skipped in the completion process. Once a step has been completed, software interferes with returning to complete a previous uncompleted step.

**B. Other Non-conformities or Observations**

- 1) These are items that are entered into the Safety Management System through meetings, accidents, incidents and near miss investigations, etc. These shall also be entered in **NS5**.
- 2) Non-conformities shall be processed the same way they are for audits.

**4. Review**

The Safety Management Representative shall review the status of open non-conformities and observations in **NS5** on a monthly basis. The results of this review shall be presented at a non-conformity meeting to address open CAR's that need action.

**5. Timeliness**

Corrective actions will be proposed and entered into **NS5** within 30 days of the completion of the audit.

It is the objective that corrective actions shall be completed within 90 days of the initiation of non-conformities and observations. It is understood that there may be instances where the scope of the corrective action may require more time to be



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completed. Such circumstances shall be noted in the corrective action notes contained in NS5.