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Subject: Engineering Materials Specifications in the Release System

Complete and timely Company response to the provisions of the Toxic Substances Control Act and the Occupational Safety and Health Act requires that we be able to rapidly and accurately determine component usage of product materials. EPA and OSHA are continually evaluating materials for potential hazard and are aggressively promulgating regulations. For example, at the October 24, 1979 joint meeting of the Engineering & Research and Manufacturing & Supply Subcommittees the status of regulations concerning carcinogens in the workplace was discussed. Engineering & Research Staff and Manufacturing Staff received the assignment to assess, within the next three to six months, the impact of workplace carcinogen regulations and develop related Company policies.

The way of identifying the released parts impacted by potential carcinogen regulations is to refer to the engineering material specification numbers of regulated materials to component part numbers. The only reliable method we currently have to do this is to conduct manual review of released drawings. This is a time-consuming process for your design engineers, but appears to be the only way to respond on workplace carcinogens. A more efficient way to do this comparison is with the computer using the materials/part number cross-reference feature of NAEPIS. While this is good in theory, a complete and accurate cross-reference from NAEPIS is not currently available.

An audit of the completeness and accuracy of materials specification data in NAEPIS was conducted by E&RS in August, 1979. The audit results (Attachment I) show that over one-third of the parts released in NAAO have no materials specification called out in NAEPIS (boxed column). In addition, 29% of those parts with material call outs have errors in the specification number (Attachment II).

Complete and accurate information in NAEPIS would mitigate the problem of responding to regulatory response requirements regarding product materials. Greater emphasis must be placed on including and verifying the materials information fed to NAEPIS from Engineering Offices. Company procedures already require that materials information be included in the Notice at time of part release (ref. PEP 3-144, PEP 3-132, and the Engineering Specification Analysts' Manual, Section IV-16).

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Based on the foregoing discussion, it is recommended that the chief engineers initiate corrective actions to improve the completeness and accuracy of the materials information fed to NAEPIS and strengthen adherence to established practice on a going basis. We plan to conduct quarterly audits of the completeness and accuracy of the materials information in NAEPIS starting in the first quarter, 1980 and will provide the results to you as an aid in assessing your improvement programs.



J. W. Durstine

Attachments