



TECHNICAL CIRCULAR No. 042 of 23rd January 2012

To: All Surveyors/Auditor

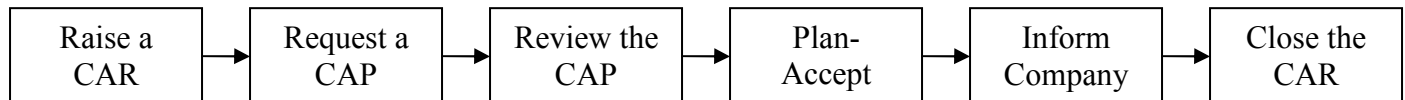
Applicable to flag: All Flags

Subject: Closing Corrective Action Requests

Reference: SAFETY –SOLAS, ISM, ISPS

Introduction

This document provides general guidance to the auditor so that Corrective Action Plans (CAP) are reviewed, approved and verified for effectiveness (closure) in a consistent manner. The following steps are involved in the process:



Step 1. Raise a CAR.

Audit findings that indicate the non-fulfillment of a specified requirement are nonconformities. CONARINA uses the Corrective Action Request (CAR) to document and track these nonconformities. Once the nonconformity has been identified, the auditor must ensure that it is supported by the relevant objective evidence. The auditor needs to describe this evidence in detail, so that the persons reading the nonconformity can understand beyond any doubt what the finding is.

The auditor should always keep in mind that the first step for getting an acceptable CAP from the company is a properly written nonconformity.

The CAR includes the reference to the standard, restates the nonconformance, and sets a target date for CAP acceptance agreed with the client. The target date defaults to last visit date (LV) + 30 days; however may be changed to an earlier date if early response is required. All Corrective Actions should be 'implemented' by the company within 90 days of the audit. .

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Step 2. Request a CAP.

All CARs are to be discussed during the closing meeting to ensure that the Company representative(s) understand the nonconformity, enabling them to begin an investigation to determine the root cause. Additionally, the Company representative(s) are to be reminded of the agreed timeframes for submittal of the CAP (30 days) and for implementing the Corrective Actions (90 days).

Step 3. Review the CAP.

Corrective action is defined as action taken to eliminate the cause of nonconformity. Additionally, the ISM Code at element 9.2 quite explicitly states that corrective action taken by the company must include, "measures intended to prevent recurrence."

Therefore the CAP submitted by the Company should include:

1. the *cause* analysis / investigation,
2. description of the action taken to eliminate the cause, i.e. the *Corrective Action*; and,
3. description of the action taken to prevent recurrence, i.e. the *Preventive Action*.

CAPs as presented to auditors can be of a varying extent, format, formality, and content. For each CAR, The auditor must devote sufficient time to verify that the submitted CAP is an acceptable response to the CAR raised during the audit.

The cause analysis assists the company in deciding on the most appropriate corrective action to rectify a nonconformity. If the cause(s) for the failure are sufficiently identified, then the company should be able to effectively establish the necessary corrective **and** preventive action(s) to address them.

A CAP should contain clearly defined set of proposed actions, which can be documented and later supported by appropriate records.

Step 4. Plan-accept the CAR(s).

Bear in mind that the effective implementation of the CAP may not be verified for up to 3 years and will in all likelihood be conducted by a different auditor. Therefore, it is important to record details of the Corrective & Preventive Actions that have been accepted in the "Plan Acceptance" field of the CAR to enable the next auditor to properly verify the effectiveness of actions taken.

Step 5. Inform the Company.

Once the CAP is accepted, the Company must be advised, in writing, that the CAP is acceptable and effectiveness of the agreed corrective and preventive actions will be verified during the next scheduled audit. A copy of this advice is to be attached to the CAP acceptance report.

Step 6. CAR Closure.

CAR closure is the final stage in the processing of a CAR.

To close a previously plan accepted CAR during the next scheduled audit, objective evidence must be gathered that shows that the agreed corrective action plan has been implemented and that cause(s) of non-conformity(ies) have been addressed. The evidence is obtained via review of appropriate records; and/or interview with company

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staff or crew members; and/or in-situ inspection.

Again, the auditor must be careful to gather sufficient, meaningful evidence that indicates the actions taken by the company have been effective in addressing the nonconformity.

Where evidence shows that the corrective action plan has not been implemented and the underlying causes still exist, the existing CAR should be closed out with suitable remarks and superseded by opening a new CAR, and making a reference to same.

The categorization of this new CAR is generally “major” but should be determined based on the gravity of the situation and the nature of the non-conformance. If in doubt, auditors should contact the CONARINA Technical Office.

Once the corrective actions have been verified as effectively implemented, the CAR can be “closed out” and the process is complete. The auditor should provide a summary of the evidence verified, in order to confirm the effectiveness of the corrective actions and thus ‘close’ the CAR.

REFERENCES:

SOLAS, ISM, ISPS

ATTACHMENTS: No.

Kindest Regards,
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