

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation 100-020-draft

EFFECTIVE DATE:

DRAFT.

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TERMINATION DATE:

DRAFT.

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ISSUE:

Clarifying the document retention practices for scrapped parts, and other details regarding scrapped parts

AFFECTED SECTIONS:

ASA-100 § 8(l) (Revision 3.6)

BACKGROUND:

The ASA-100 quality system requires that an accredited distributor meet the requirements of both ASA-100 and the FAA Advisory Circular AC 00-56 (Voluntary Industry Distributor Accreditation Program).

Section 8(l) of the ASA-100 standard provides instructions related to scrapped parts.

Members have expressed concerns that the document retention requirement associated with scrapped parts does not meet current industry best practices. The current language states:

I. Scrapped Parts: There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, or other appropriate means. Parts shall be mutilated to the extent that will preclude the possibility of their being restored and returned to service. For additional information see ASA Best Practice – Disposition of Unsalvageable Aircraft Parts.

- 1)** Records and documents shall be maintained on all serialized scrapped parts. The procedure shall identify by title or position the individual responsible for verifying that parts were adequately mutilated before discard.
- 2)** The distributor shall maintain a record of all life-limited parts scrapped out. The record shall contain a description of the part, its part number and serial number, if applicable, and the date the part was scrapped. The dealer shall retain this record for at least seven years.
- 3)** The distributor shall impose these same requirements on their subcontractors and/or repair facilities with whom they do business.

The main problems identified in the procedure relate to the document retention practices. The standard fails to specify which records are useful for retention. It may be read to imply that the prior traceability documentation reflects the records that should be retained. This is not the information that is useful for retention. The information that is most useful for retention is identification of the specific part that was scrapped and verification that it was scrapped. Past historical information that is useful for airworthiness determination may no longer be useful because there is no longer a need to identify the part as airworthy after it has been scrapped. In order to clarify this, the language specifying the records for retention following a scrapping activity has been more precisely described.

The set of life-limited aircraft parts is a subset of the set of serialized aircraft parts (some parts are serialized but are not life-limited). In the prior existing language, two different record-keeping practices were required base on this distinction. To simplify the standards in the new language, the same record-keeping practices are applied to all serialized parts that are scrapped, regardless of whether they were life-limited.

The change also makes other minor changes to the language of the section for clarification purposes.

RESOLUTION:

Section 8(l) of the ASA-100 standard (revision 3.6) shall be amended to read as follows:

8. Material Control

- (l) Scrapped Parts:** There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, or other appropriate means. When the distributor chooses to scrap a part, the part shall be mutilated to the extent necessary to preclude the possibility of it being restored and returned to service. For additional information see ASA Best Practice – Disposition of Unsalvageable Aircraft Parts.
- 1) The distributor shall maintain a record of all serialized and/or life-limited parts scrapped out. The record shall contain a description of the part, its part number, serial number (if applicable), and the date the part was scrapped. The distributor shall retain this record for at least seven years. Retaining any other records for the scrapped parts shall be at the discretion of the distributor.
 - 2) The procedure shall identify, by title or position, the individual responsible for verifying that parts were adequately mutilated before being discarded.
 - 3) The distributor shall impose these same requirements on the subcontractors and/or repair facilities that scrap parts as agents of the distributor.

This change will be effective as of the effective date of this LOI, and the ASA-100 standard (revision 3.6) shall be considered amended by this LOI as of that date. All ASA-100 accredited distributors must ensure that their systems comply with ASA-100 (as amended by this LOI) within 90 days after the effective date of this LOI. Compliance with this LOI shall be permitted beginning on the effective date of this LOI.

Regardless of this LOI, an accredited distributor will be required to follow the written guidance found in its quality manual, as well as the standards to which it is accredited. If this LOI contradicts the accredited distributor's quality manual, ASA-100 or AC 00-56, then the controlling authority is determined in the following order of precedence:

- 1) AC 00-56
- 2) ASA-100 (as amended by this LOI)
- 2) Quality Manual

However, an accredited distributor whose quality manual imposes additional requirements beyond the requirements of this LOI shall be expected to follow both the LOI and the additional requirements found in the distributor's own quality manual.

ANTICIPATED FUTURE ACTION:

This interpretation is offered to amend ASA-100. ASA intends to update the language of ASA-100 to clarify this point in the next revision, at which time ASA-100 § 8(l) shall be explicitly amended to read as follows:

8. Material Control

(l) **Scrapped Parts:** There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, or other appropriate means. When the distributor chooses to scrap a part, the part shall be mutilated to the extent necessary to preclude the possibility of it being restored and returned to service. For additional information see ASA Best Practice – Disposition of Unsalvageable Aircraft Parts.

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- 3) The distributor shall impose these same requirements on the subcontractors and/or repair facilities that scrap parts as agents of the distributor.

**QUESTIONS/INQUIRES SHOULD BE ADDRESSED TO:
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