Implementation of an action plan to fight against fraudulent and counterfeit items within EDF – Manufacturing phase

Luc BERHAULT
CFSI context within EDF on manufacturing phase

Current status in EDF in 2018:
• Few cases per year but with potential significant impacts (Safety, staff security, availability of NPPs, costs impacts, discredit on Nuclear and on surveillance made by the Operators) - high workload to justify the impacted components…

• Different kinds of C&F items: Renewal of welders qualifications; Material certificates acc. NF EN 10204 Std (counterfeit; modification of Lab report; change of information within internal supplier documentation)…

• Different “organization” of the C&F: mainly by personal initiative isolated but favored by a lack of individual and collective safety culture on suppliers not belonging to Tier 1 (rank n, n >= 3)

• Different means of discovering:
  - By the surveillance of the Client/operator (inspector ..) but generally can be late..
  - By the surveillance of the main Contractor on its supply chain (trend: 📈)
  - By the mean of preventive CFSI visit made by EDF/DI at some suppliers’ workshops

→ Diversity of cases encountered (leading to difficulties to fight against);
→ Generally disproportion between the act of fraud made and the associated technical stakes
The current means of Fighting against C&F items within EDF:

• In Call for tender phase: on contract at stake, to assess Industrial Scheme (supply chain) of the Main Contractor – to orientate or impose the choice of some sub-contractors in case of risk

• Inclusion of the Industrial Policy of EDF within the DI entity in charge of the Manufacturing surveillance: to make closer the two entities & topics (eg: analysis of weakness signals in economical field, industrial watch..)

• To raise awareness among Industry and ask them what action plan they implement themselves:
  - Sending a formal mail to the most important Contractors (about 150 for EDF) signed by Head of Generation/ New Build Directions
  - Qualification of the Main Contractor by EDF includes already a survey on safety culture and Ethic Policy.

• To include in procurement clauses more explicit & enhanced requirements for the Main Contractor:
  - obligation to survey its sub-contractor, to accept extended surveillance made by EDF/DI (more intrusive), to carry out risk analyses and surveillance plan and to send it to EDF, to send material sampling for independent test made by EDF …

• To carry out different surveillance:
  - Unexpected inspections; asking for the original material 3.1 certificate from the issuing entity.
  - Contradictory surveillance (NDT, chemical composition, comparative inter-lab on tensile test..) with own EDF resources or other external independent Lab
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Current difficulties & proposal to move forward:

• No formal organization existing today to communicate between different Operators / Main contractors the cases encountered (especially when C&F is not proven – stay at SI stage) :
  • C&F are offense punishable by the law : How to deal with “technically” the risk without involving contractual & legal consequences, not in the same time (to be dealt with but by other party and in a second time) ?
  • each company name indicated with risk of CFSI could have significant consequences (risk of missing markets – economic viability – risk of company closure and staff dismissal..)
  • Risk of Offense of defamation for the counterparts involved in the sharing of the information … and in the same time to preserve the information sharing in order to prevent potential consequences on a Quality concern for an item of equipment to be used in a nuclear facility

Proposal on going : to use the recent creation of the GIFEN (Group of French Nuclear Industry Companies - mid 2018) in order to share CFSI topics (not yet implemented – terms and conditions not yet defined – on going)
But what about beyond this Group ?
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Current difficulties & proposal to move forward:

- The surveillance is usually based on the observation of stamped reports - how to detect fake documents of « good quality » ?
  - Difficulty in questioning the veracity of all documents: how to choose the ones on which we will ask for the originals from the issuing Body?

Good practice to encourage for generalization: one Third Party entity in France has set-up a QR code on tensile test report, allowing inspector to check easily the compliance with the original on « Certificate & Report Authentication Service » of the TP