

# Policy – Foreign Material Exclusion (FME)

NEL-POL-10

Issue: V1



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## Amendment Record

Policies are reviewed annually to ensure relevance to the systems and processes they define.

### Issue History Sheet

Issue	Nature of changes	Prepared by	Authorized by	Date
1	First Issue	AW	DM	11/01/2023

The signatures above certify that this document has been reviewed and accepted.

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## Policy

This policy outlines our commitment to identification and management of foreign materials during our production and service provision to our customers.

## Definitions and concepts

### Foreign Material

A foreign material is defined as any material that does not belong to a body of substance, system, component or environment by design and/or intent and may cause harm to structural integrity or functional capability of that body or system.

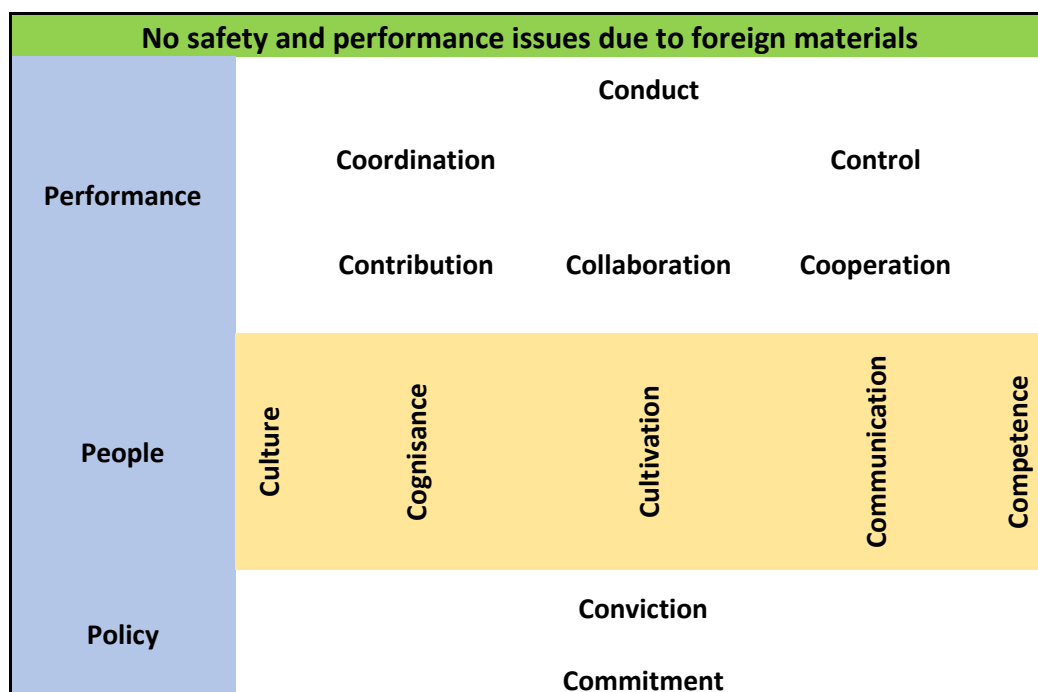
The term ‘foreign material’ applies to ‘foreign object’ ‘foreign body’, or foreign matter’.

The foreign material might be external such as tools dirt, dust, oil and may get in through an intrusion path. They may also be internal such as erosion/corrosion or broken or lose parts.

The elimination, extraction and exclusion of foreign materials is necessary to support safe and reliable operation by preventing undesirable consequences owing to adverse impact from foreign materials.

## Fundamental aspects of foreign material management

The effectiveness of foreign material management is built on the 3 P’s: Policy, People and Performance, and the 13 C’s: commitment, conviction, culture, cognizance, cultivation, communication, competence, contribution, collaboration, cooperation, coordination, control and conduct as illustrated below:



## Culture

At Nautic Engineering Ltd, foreign material management planning is all about behaviors and attitude:

- A general awareness of and willingness to act to assist the control and management of foreign material and make safe decisions accordingly
- A genuine willingness to support because our team want to rather than are told to

This has been achieved through:

- Foreign material awareness and vigilance
- Cultivated personal engagement
- A 'Clean as you go' housekeeping philosophy and habits
- Self-driven observation and desire to learn, improve, share and understand
- A no-blame philosophy which sees a learning opportunity in every mistake
- In-house awareness training in proactively predicting, controlling and prevention of foreign material inclusion events

## Plan, Do, Check, Act

### Plan

We will establish, develop, coordinate, integrate and modify our existing processes, procedures and instructions to meet this policy commitment.

### Do

We will control our activities and operational use of equipment and tools in accordance with our procedures and work instructions.

### Check

We will inspect and monitor our activities, including procedures, human performance, environment and the identification, recording and reporting of deficiencies.

### Act

We will act, following timely detection, to assess, correct and prevent foreign material inclusion, by appropriate programme modifications to determine the type and timing of any corrective actions required.

## Graded approach to implementation

Our graded approach will not compromise safety on any occasion. It will be consistent and compliant with all applicable regulations, codes and standards. We will apply tighter controls to more significant activities based on their cause and effect aspects. These may include:

- Nuclear industrial and radiological safety impacts and importance
- Quality and reliability designations, requirements, expectations and effects

- Performance goals and expectations
- Severity of consequences
- Rarity/frequency/specialty of the activity
- Complexity of the activity
- Level of interaction with parallel activities of the same or different scale

## Performance improvement

As in all we do we are committed to continuous improvement through internal auditing, client feedback, inspection and monitoring processes. Our nonconformance reports and metrics will be reviewed periodically to identify any recurring issues or adverse trends. Our corrective actions will be established to address both the direct and root causes of events. We will monitor the effectiveness of the corrective actions taken.