NIST VST Program-Specific Checklist

Instructions to the Assessor: This checklist addresses the Voting System Test Program specific criteria prescribed in NIST Handbook 150-22, NVLAP Voting System Testing (2005 edition), the 2002 Voting System Standards (VSS-2002), HAVA Section 301, and 2005 Voluntary Voting System Guidelines (VVSG 2005). The checklist items are numbered to correspond to the requirements found in Clauses 4 and 5, and Annexes A and B of the handbook plus a section devoted to the HAVA requirements not encompassed by the earlier VSS 2002.

Note: During the transition period to mandatory testing under VVSG 2005, some vendors may request testing for compliance to the VSS 2002 standards. A laboratory accredited under the Voting System Test Program is required to test and report to the HAVA requirements which extends VSS 2002 standards but may, at the request of the vendor, not extend the testing to the full compliance of the VVSG 2005 requirements.

4 Management requirements for accreditation

4.1 Organization

4.1.1 The laboratory shall establish and maintain policies and procedures for maintaining laboratory impartiality and integrity in the conduct of voting system testing. When conducting testing under HAVA, the laboratory policies and procedures shall ensure that:

   a) laboratory staff members cannot both develop and test a product or system;
      Need to be added
   b) laboratory staff members cannot provide consulting services for and then participate in the test of that product or system.
      Need to be added

   4.1.2 The laboratory shall have physical and electronic controls augmented with an explicit policy and set of procedures for maintaining separation, both physical and electronic, between the laboratory test personnel and laboratory consultants, product developers, system integrators, and others who may have an interest in and/or may unduly influence the outcome of the test.
Physical Entry is controlled by entry desk and visitors are to be escorted at all time (no visitor badge identification), alarm system on doors/separate for entry and back door, video surveillance in all rooms, keyed locks on lower security test labs can be switched out with cypher lock. On entry of visitors to the high security area, all monitors are blanked. Hard copy records are kept in locking filing cabinet which can have more secure locks installed as needed. Higher security areas mahve full hand geometry locks and pass card to entery. Secure FTP site; procedures include removing old files once

4.2 Management system

4.2.1 The controlled version of the laboratory management system documentation may be paper-based or computer-based. Version control shall be maintained in either case.

Use 'SharePoint' an online document control system.

Note: If both methods of documentation is used, one or the other will be identified as the primary source with the other having the status of a copy (historical, archive, working, distribution)
The 'SharePoint' is the master copy. When a change is made and approved, the prior version is promoted to archive storage and the current version is posted
To access the 'SharePoint' for Voting System Vertical documents, the user must be given 'Voting Privileges' to access the Procedures (Proc folder/subdirectory), Template accessed by project managers and copied to a new Project (=test campaign) where only people in teh project group are given access.

Source code is not kept in 'SharePoint' but stored in locked cabinets
iBeta was expecting the NRSL to be a depository of software. Need to check on status of NRSL program.

4.2.2 The following general management system procedures (required, but not limited to) shall be included with the quality manual when it is submitted as part of the application package:

- a) internal audits and management review;
- b) writing and implementing system procedures;
- c) writing and implementing system instructions;
- d) staff training and individual development plans;
- e) contract review;
- f) staff members who work at home and at alternate work sites outside the laboratory (e.g., telecommuting);
- g) referencing NVLAP accreditation and use of the NVLAP symbol.

4.2.3 The following program-specific procedures shall be included with the quality manual when it is submitted as part of the application package:

- a) review of the vendor Technical Data Package (VSS-2002, Volume II, Section 2). This procedure shall include:
  - Use in preparing Qualification/National Certification Test Plan. (Ref VSS Vol II,2.1,See also VI,9.)
  - Format. Table of content, abstracts, and cross-index against the VSS/VVSG documentation requirements (Ref: VSS Vol II,2.1.1.3)
  - Provisions for placing the TDP in escrow for reference in state certification and acceptance testing. (Ref: VSS Vol II, 2.1.2)

  Note: Completion of the TDP Review includes the validation of user procedures and operation manuals against the actual equipment.

  Note: vendor diagnostics and simulations must be validated.
- b) selecting the laboratory staff for a Qualification/National Certification test team;
- c) writing a Qualification/National Certification Test Plan for first-time testing and testing of modified systems (Ref VSS-2002, Volume II, Appendix A);
- d) writing Test Operation Procedure (Ref VSS-2002, Volume II, Appendix A.6.4);
- e) conducting testing at a customer's site (if the laboratory offers such services);

  NOTE: Reference NASED Tech Guide for witnessed build
- f) writing a Qualification/National Certification Test Report (VSS-2002, Volume II, Appendix B);
- g) reviewing the Configuration Management Plan (VSS-2002, Volume II, Section 2.11);
Ref 5.3.2-5.3.4 h) ensuring the protection of proprietary information against threat from persons outside the laboratory, from visitors to the laboratory, from laboratory personnel without a need to know, and from other unauthorized persons;

_____ i) cooperating with the EAC during test campaigns;


4.3 Document control

There are no requirements additional to those set forth in NIST Handbook 150. The following ref HB 150

4.3.1 From NIST Handbook 150

QMS Document Control Procedure /QMS Policy reference: Sect 4.3

4.3.2.b Online Shareware program provides automatic access to current version. A list can be created on demand from the sharepoint.

4.3.2.2.c Automatic promotion to archive which not directly accessible unless and active link is established to legacy references Obsolete documents are marked. (Example: Handbook 150-22)

4.3.2.2d Document control

4.3.2.3 Voting Deliverables Receipt Procedure as sample

Ref: QMS Document Control Procedure

4.4 Review of requests, tenders and contracts

_____ 4.4.1 The procedures for review of contracts shall include procedures to ensure that the customer understands that its products and systems must meet the requirements of HAVA, the VSS-2002, and the EAC.

_____ 4.4.2 The review shall include (but is not limited to): laboratory competencies and resources to provide the service, vendor-supplied documentation, tests to be conducted, test requested in addition to Qualification/National Certification Testing, and the requirements for subcontracting

Def. 4.4.3 The laboratory may conduct one or more state's Certification Testing for products and systems for which it previously conducted Qualification/National Certification Testing.

_____ NOTE: Procedures for the review of requests, tenders, and contracts should include provisions to ensure that any State Certification Testing does not replace or dilute the Qualification/National Certification Testing requirements.

_____ 4.4.4 When conducting a contract review, the VSTL should determine if there are any special or changed requirements from the EAC or from state or local election authorities.

4.5 Subcontracting of tests and calibrations

Def. 4.5.1 Subcontracting of tests and calibrations is the use of laboratory services outside of the VSTL to perform tests and calibrations, e.g., electromagnetic compatibility testing, environmental testing, shock and vibration testing, FIPS 140 validation, and physical test instrument calibration. The word subcontracting is not used to describe a mechanism by which the laboratory employs staff members (see 5.2.7).

QMS Subcontracting Procedure

Test Case Preparation and Execution
Tabs (forms) include identifying the accreditation credentials Number, scope (methods),
4.5.2 If the VSTL subcontracts testing for any test within its scope of accreditation, the subcontracted laboratory shall also be an EAC-accredited VSTL. All core voting system testing shall be conducted by a VSTL.

4.5.3 If the VSTL subcontracts voting system testing that is outside of its scope of accreditation, the subcontracted laboratory must be:

- a. located in the United States,
- b. an accredited laboratory under NVLAP (preferred) or another LAP with which NVLAP has signed a Mutual Recognition Arrangement (MRA).
- c. accredited under the appropriate scope of accreditation for the testing which is subcontracted.

d. If the VSTL needs to subcontract voting system testing outside of the core requirement scope of accreditation, the VSTL shall include in their application and Quality Management procedures a list of validated test labs and the tests for which they will use.

Subcontracting specifies a "list" of qualified subcontractors. Currently blank

4.5.4 When a VSTL subcontracts to another laboratory, the VSTL is responsible for ensuring that setup, configuration, testing, and reporting is competent, appropriate, and conducted by qualified people. The VSTL shall ensure:

- a. The equipment under test is the same production design models as that presented to and used by the VSTL for Qualification/National Certification Testing
- b. The equipment operations used in the subcontracted testing are based on the operations as a voting system component. Where appropriate, the VSTL shall provide test procedures or perform the Operational Status Test or operations based on the Operational Status Test (Ref VSS Vol II,

Note1: For example, a VSTL subcontracting with another laboratory to conduct temperature cycling tests should conduct the functional testing itself rather than allowing the subcontractor to do so. The VSTL is responsible for ensuring that the entire voting system is properly tested.

4.6 Purchasing services and supplies
There are no requirements additional to those set forth in NIST Handbook 150.

4.7 Service to the customer
There are no requirements additional to those set forth in NIST Handbook 150.

4.8 Complaints
There are no requirements additional to those set forth in NIST Handbook 150.

4.9 Control of nonconforming testing and/or calibration work

4.9.1 (Draft) The procedures shall include a requirement for reporting to the EAC when non-conforming work is identified as having occurred on previous campaigns.

4.10 Improvement
There are no requirements additional to those set forth in NIST Handbook 150.

4.11 Corrective action
There are no requirements additional to those set forth in NIST Handbook 150.

4.12 Preventive action
There are no requirements additional to those set forth in NIST Handbook 150.

4.13 Control of records
4.13.1 The laboratory shall set policies and procedures on the retention of records that meet the requirements of HAVA and the EAC and meet the needs of its customers as agreed in a contract. Volume I, Section 2.2.11 of the VSS-2002, "Data Retention," does not apply to the retention of records of testing by the VSTL.

4.13.2 The laboratory shall maintain a functional record-keeping system that is used to track each product or system.

   a. Records shall be easily accessible and contain complete information for each Qualification/National Certification test.

   b. Required records of testing activities shall be traceable to requirements in the VSS-2002

   NOTE: Technical reviewers of the Qualification/National Certification Test Reports have requested that the report include a standardized test requirement matrix against the VSS 2002/VVSG 2005 requirements showing which tests/reviews were performed, whether the results were accepted, and, if based on reports from earlier tests or laboratories, the reference for the report of the test.

   c. Computer-based records shall contain entries indicating the date created and the individual(s) who performed the work, along with any other information required by the management system.

   d. Entries in laboratory notebooks shall be dated and signed or initialed

   e. All records shall be maintained in accordance with laboratory policies and procedures and in a manner that ensures record integrity.

   f. There shall be appropriate backups and archives

4.13.3 Laboratory records shall be maintained, released, or destroyed in accordance with the laboratory’s policy on proprietary information and contractual agreements with customers.

4.13.4 The Qualification/National Certification Test Report plus the laboratory's records of the Qualification/National Certification test shall contain sufficient information to allow repeating, reproducing and/or auditing the entire Qualification/National Certification test.

4.14 Internal audits

4.14.1 Internal audits shall be performed on a schedule prescribed by the laboratory policies and procedures. Recent internal audit reports shall be available for review during NVLAP on-site assessments.

4.14.2 The internal audit shall cover the laboratory management system and the application of the management system to all laboratory activities, including compliance with NVLAP, HAVA, VSS-2002, contractual, laboratory management system, and any additional EAC requirements.

4.14.3 In the case where only one member of the laboratory staff is competent to conduct a specific aspect of a test method, and performing an audit of work in this area would result in that person auditing his or her own work, then the audit may be conducted by another staff member. External experts may also be used in these situations.

The audit shall cover the methodology for that test method and shall include a review of documented procedures and instructions, adherence to procedures and instructions, and review of previous audit reports.

4.14.4 The laboratory shall perform at least one complete internal audit of its management system prior to the first on-site assessment.
4.15 Management reviews

_____ 4.15.1 Management reviews shall be performed on a schedule prescribed by the laboratory policies and procedures.

Note: Recent management review reports shall be available for review during NVLAP on-site assessments. Date and title ____________________________

_____ 4.15.2 The laboratory shall perform at least one management review prior to the first on-site assessment.

5 Technical requirements for accreditation

5.1 General

_____ The quality manual shall contain, or refer to, documentation that describes and details the laboratory's implementation of procedures covering all of the technical requirements in NIST Handbook 150 and this handbook.

5.2 Personnel

_____ 5.2.1 The laboratory shall maintain a competent administrative and technical staff appropriate for testing voting systems to be recognized by the EAC under the HAVA. The laboratory shall maintain position descriptions, training records and resumes for responsible supervisory personnel and laboratory staff members who have an effect on the outcome of Qualification/National Certification tests.

_____ 5.2.2 The laboratory shall maintain a list of personnel designated to fulfill NVLAP requirements including: An individual may be assigned or appointed to serve in more than one position; however, to the extent possible, the laboratory director and the quality manager positions should be independently staffed.

Laboratory Director: Earl B. Wing, VP & CFO

Technical Director: Johnathan P. Goldman, Dir of Information Technology

Authorized Representative: List names and titles
a. Carolyn Coggins QA Director

Approved Signatories:

a. Gail Audette

b. Carolyn Coggins

c. ________________________________

Team Leaders (reference Org chart) Carolyn Coggins & Gail Audette

Quality Manager: Gail Audette

Note: A organization chart identifying positions and titles shall be provided as part of the VSTL application and updated when these positions are changed with the EAC.
5.2.3 The laboratory shall notify both NVLAP and the EAC within 30 days of any change in key personnel. When key personnel are added to the staff, the notification of changes shall include a current resume for each new staff member.

Need to Add

5.2.4 Laboratories shall document the required qualifications for each staff position. The staff information may be kept in the official personnel folders or in separate, official folders that contain only the information that the NVLAP assessors need to review.

5.2.5 The laboratory shall have documented a detailed description of its training program for new and current staff members. Each new staff member shall be trained for assigned duties. The training program records shall be updated as individuals are assigned new responsibilities. Each staff member may receive training for assigned duties either through on-the-job training, formal classroom study, attendance at conferences, or another appropriate mechanism. Training materials that are maintained within the laboratory shall be kept up-to-date.

5.2.6 The laboratory shall review annually the competence of each staff member for each test method the staff member is authorized to conduct. The staff member’s immediate supervisor, or a designee appointed by the laboratory director, shall conduct annually an assessment and an observation of performance for each staff member. A record of the annual review of each staff member shall be dated and signed by the supervisor and the employee. A description of competency review programs shall be maintained in the management system.

5.2.7 Individuals hired to perform testing activities are sometimes referred to as subcontractors. NVLAP does not make a distinction between full-time laboratory employees and individuals hired on a contract. NVLAP requires that the VSTL maintain responsibility for and control of any work performed within its scope of accreditation. To that end, the VSTL shall ensure all individuals performing testing activities satisfy all NVLAP requirements, irrespective of the means by which individuals are compensated (e.g., the VSTL shall ensure all test personnel receive proper training and are subject to annual performance reviews, etc.).

5.2.8 The records for each person having an effect on the outcome of the testing shall include:

a) position description;

b) resume/CV/bio to match the person to the position;

c) duties assigned;

d) annual competence review;

e) training records and training plans.

5.2.9 In order to maintain confidentiality and impartiality, the laboratory shall maintain proper separation between personnel conducting testing and other personnel inside the laboratory or outside the laboratory, but inside the parent organization.

5.3 Accommodation and environmental conditions

5.3.1 The laboratory shall have adequate facilities to conduct the voting system testing that it offers. This includes facilities for staff training, record keeping, document storage, and software storage. If testing activities are conducted at more than one location, all locations shall meet the NVLAP requirements, and mechanisms shall be in place to ensure secure communication between all locations.
5.3.2 A protection system shall be in place to safeguard customer proprietary hardware, software, test data, electronic and paper records, and other materials. This system shall protect the proprietary materials and information from personnel outside the laboratory, visitors to the laboratory, laboratory personnel without a need to know, and other unauthorized persons.

5.3.3 Laboratories shall have systems (e.g., firewall, intrusion detection) in place to protect internal systems from untrusted external entities. The laboratory shall have regularly updated protection for all systems against viruses and other malware. The laboratory shall have an effective backup system to ensure that data and records can be restored in the event of their loss.

5.3.4 If the laboratory is conducting multiple, simultaneous tests, it shall maintain a system of separation between the products of different customers. This includes the product itself, the test platform, peripherals, documentation, electronic media, manuals, and records.

5.3.5 If testing activities will be conducted outside of the laboratory, the management system shall include procedures for conducting activities at customer sites or other off-site locations. For example, procedures may explain how to secure the site, where to store records and documentation, and how to control access to the test facility.

5.3.6 If the laboratory is conducting its tests at a customer site or other location outside the laboratory facility, the environment shall conform, as appropriate, to the requirements for a laboratory environment. If a customer’s system on which a test is conducted is potentially open to access by unauthorized entities during testing, the VSTL shall control the test environment. This is to ensure that the systems are in a defined state compliant with the requirements for the test before starting to perform testing work and that the systems ensure that unauthorized entities do not gain access during testing.

Witness Build Procedure  Need for other test cases in situ testing
Note: See NASED Guideline 4 for specific requirements on witnessed builds at customer sites.

5.4 Test and calibration methods and method validation

5.4.1 The test methods for this program are given in the VSS-2002 approved by the Federal Election Commission on April 30, 2002, and adopted in the HAVA. In the VSS-2002, there are specific test methods, references to test methods, and provisions for laboratory-developed test methods. The EAC may amend and augment the VSS-2002.

The laboratory shall develop procedures for implementation of the new requirements when the EAC amends or augments the VSS-2002

Note: VVSG 2005 is an amendment to the VSS-2002.

5.4.2 For each test in the Test Plan, the laboratory shall document all aspects of the test including the test method. The level of detail shall be such that the laboratory can repeat the test or another laboratory can reproduce the test and the results of the test will be equivalent to the original test.

Where the laboratory has developed test methods to meet the requirements of the VSS-2002, validation of the test methods shall be included in the documentation.

5.4.3 For the purposes of achieving product certification under HAVA, laboratories shall comply with interpretations of the test methods as provided by the EAC.

When exceptions to the testing methodology may be necessary for technical reasons, the laboratory shall ask the EAC for an interpretation, the customer shall be informed, and details of an interpretation shall be described in the test report.

5.4.4 As a part of the testing procedure, the laboratory shall describe by whom and how the voting system will be configured. If the customer configures any part of the voting system, then the laboratory shall verify the configuration, including all software.

PCA Configuration   Need further work
Note: This is to include the configuration of COTS software installed to support the system.

5.4.5 When testing activities are conducted outside the laboratory, the laboratory shall have additional procedures to ensure the integrity of all tests and recorded results. These procedures shall also ensure that the same requirements that apply in the laboratory and its facility are maintained at the non-laboratory site.

See 5.3.6

5.4.6 The laboratory shall clearly identify any test methods included in the test campaign that are outside of the laboratory's scope of accreditation.

5.5 Equipment

5.5.1 The laboratory shall document and maintain records on all test equipment or test suites used during testing. Test equipment includes software and hardware products or other assessment mechanisms used by the laboratory to support the testing of products and systems. The laboratory shall also know how to configure and operate all equipment within its control.

PCA Configuration

5.5.2 Computer systems, and other platforms used during the conduct of testing shall be under configuration control. The laboratory shall have procedures to ensure that any equipment (hardware and software) used for testing is in a known state prior to use for testing.

Note: The procedures for the Test Report shall include a report of the configuration of the operational voting system equipment including COTS component versions used in the actual test.

5.5.3 Test equipment shall be properly calibrated. For test equipment, calibration means verification of correctness and suitability. Any software test tools shall be validated to be sure that they are accurately testing to the standard. They shall also be examined to ensure they do not interfere with the conduct of the test and do not modify or impact the integrity of the product under test in any way. VSS-2002, Volume II, Section B.3 requires the documentation of the tested software and supporting hardware.

Need development

5.5.4 Laboratories shall have procedures that ensure appropriate configuration of all test equipment. Laboratories shall maintain records of the configuration of test equipment and all analyses to ensure the suitability of test equipment to perform the desired testing.

5.5.5 For software testing, calibration is used to mean that all hardware, software, interfaces, etc. have been brought under configuration management and that the laboratory can reproduce the conditions under which each specific test was conducted. Where an operating system, user applications, test tools, and customer software are loaded onto a platform, calibration covers the hardware platform, all software, and the order in which the software was loaded.

5.6 Measurement traceability

Def. 5.6.1 For this NVLAP program, traceability is used in two different ways. The first applies to classical test and measurement equipment. The second to software and system testing.

Def. 5.6.2 The classical definition of traceability is a comparison of a measured value to a stated reference through an unbroken chain of comparisons all having stated uncertainties. For example, a micrometer is calibrated using a gauge block that has been assigned a value that is traceable though the national standard to the International System of Units (SI).

5.6.3 For software and some systems testing, traceability means that the operations performed by a test or test tool have been demonstrated to embody the assertions contained in the documentary standard. This means that test tools and test methodology demonstrate that the tests conducted by the tools and the test assertions they make are traceable to specific criteria and methodology.

FCA Test Planning Procedures
FCA Test Document Review
The Test Plan and Report shall include test requirement matrix identifying the requirements that are being satisfied.
Matrix is to be App A in Certification Test Report
Need to develop for referencing prior tests where the prior test is accepted without retesting.
Note: Reference

5.7 Sampling

5.7.1 The laboratory shall use documented procedures for sampling. When sampling is used during a test campaign, the laboratory shall document its sampling strategy, the decision-making process, and the nature of the sample. Sampling may include (but is not limited to):

- a) hardware items;
- b) software;
- c) system configuration;
- d) test methods;
- e) system states at time of test.

5.7.2 The VSS-2002 requires that the laboratory document its plan for the minimum number of combinations or alternatives of input and output conditions that can be exercised to constitute an acceptable test of the parameters involved (VSS-2002, Volume II, A.5.2).
Need to be developed

5.7.3 Sampling shall be part of the test record.
Need to be added

5.8 Handling of test and calibration items

5.8.1 The laboratory shall protect products and systems under test and calibrated tools from modification, unauthorized access, and use. The laboratory shall also maintain separation between and control over the items from different tests, to include the product being tested, its platform, peripherals, and all documentation.

iBeta: QMS 5.18  Equipment Handling and Validation
VSV: QMS 6.2.1 Voting Deliverable Receipt

5.8.2 When the product being tested includes software components, the laboratory shall ensure that configuration management mechanisms are in place to prevent inadvertent modifications to the software components during the testing process. This includes the customer's software, test tools, and commercial off-the-shelf (COTS) software.

5.8.3 The laboratory shall have procedures to ensure proper retention, disposal or return of software and hardware after the completion of the test.
Need to added procedures for notifying the client

5.9 Assuring the quality of test and calibration results

Each Procedure includes a Q Control requirement

The laboratory shall have procedures for conducting final review of testing, Qualification/National Certification Test Reports and any other test reports it issues, and laboratory records of the testing prior to submission to the customer and/or the EAC.

5.10 Reporting the results

5.10.1 The laboratory shall issue test reports of its work that accurately, clearly, and unambiguously present the test plan, test conditions, test setup, test methods, test results, and all other required information. Test reports shall provide all necessary information to permit the same or another laboratory to reproduce the test plan and obtain comparable results.
5.10.2 There may be more than one type of test report issued by the VSTL, including:

a) Qualification/National Certification Test Reports (VSS-2002, Volume II, Appendix B) that are to be submitted to the EAC-designation certification body;

b) test reports submitted to a state for its use in Certification Testing
Need to specify how report will be distinguished from The National Certification Test Report. Question includes consideration of whether the report should bear the NVLAP label as accredited lab.

c) test reports that are produced under contract and intended for use by the customer.
Need to specify how report will be distinguished from The National Certification Test Report. Question includes consideration of whether the report should bear the NVLAP label as accredited lab.

5.10.3 Qualification/National Certification Test Reports created for submission to the EAC shall meet the requirements of the VSS-2002 and any additional EAC requirements. The report shall contain sufficient information for the exact test conditions and results to be reproduced at a later time if a re-examination or retest is necessary. Reports shall be submitted in the form and by the method specified by VSS-2002. Information required to reproduce the test but not included in the Qualification/National Certification Test Report shall be kept by the laboratory as part of the testing records.

5.10.4 Reports intended for use only by the customer shall meet customer-laboratory contract obligations and be complete, but need not necessarily meet all VSS-2002 requirements. Information required to reproduce the test but not included in the test report shall be kept by the laboratory as part of the testing records.

5.10.5 The test reports shall clearly indicate that the test results apply to the product or system as tested. Testing of products or systems that have been modified may or may not produce the same test results.

5.10.6 The section of a Qualification/National Certification Test Report that meets the VSS-2002 requirement for a summary or the recommendation section of a test report for a customer shall also meet the requirements of NIST Handbook 150 on opinions and interpretations under Reporting the results.

6 Additional requirements

See the Technical Supplement
**NIST HANDBOOK 150-22 CHECKLIST**  
**COMMENTS AND NONCONFORMITIES**

**Instructions to the Assessor:** Use this sheet to document comments and nonconformities. For each, identify the appropriate item number from the checklist. Identify comments with a “C” and nonconformities with an “X.” If additional space is needed, make copies of this page (or use additional blank sheets).

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