Base Load Power Hub (BLPH)

NON CONFORMITY LIST AND REPORTS

Document Number: 123A90-PML-QC-DB-00006

Document Class: 3

00	30/04/2026	Issue for Information (IFI)	S.Linari	F.Zanellati	R.Degli Esposti
Rev.	Date	Description	Prepared	Reviewed	Approved

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Revision / Change Log

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1 INTRODUCTION AND INSTRUCTIONS FOR USE

This dossier compiles all Non-Conformity Reports (NCRs) issued for the BLPH project.

It is structured with an index of NCRs, followed by dedicated sections containing the individual reports, categorised into operational NCRs and supply-related NCRs.

2 OPERATIVE NON-CONFORMITY LIST AND REPORTS

Operative Non Conformity

Job	Client	NCR Num.	Short Title	Noted by	Managed by	Revision	Process	Status	Remarks
123A90	CROSSWIND C.V.	2024-Q-123A90-0001	RT CHECK NOT PROPERLY PERFORMED	Sortino Enzo	Degli Esposti Raffaele	0	QUALITY CONTROL	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0002	VOID-DELETED						
123A90	CROSSWIND C.V.	2024-Q-123A90-0003	FAILURE TO NOTIFY SUBCONTRACTED ACTIVITY TO EXTERNAL COMPANY	Sortino Enzo	Degli Esposti Raffaele	0	SUPPLY MANAGEMENT	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0004	HANDRAILS WITH INCORRECT RAL	Sintoni Viola	Degli Esposti Raffaele	0	SUPPLY MANAGEMENT	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0005	CABLE TRAYS WITH BURN DAMAGES	Marchetti Sofia	Marchetti Sofia	0	SUPPLY MANAGEMENT	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0006	FAILURE TO NOTIFY INTERVENTION POINT	Linari Stefano	Degli Esposti Raffaele	1	SUPPLY MANAGEMENT	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0007	EXECUTION OF HYDROSTATIC TEST WITH TEST PROCEDURE AND ITP NOT APPROVED UNDER CODE 1	Degli Esposti Raffaele	Degli Esposti Raffaele	0	SUPPLY MANAGEMENT	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0008	DOOR SEALS ARE CONTAMINATED & WELDING SPATTERS ARE PAINTED OVER	Linari Stefano	Linari Stefano	0	SUPPLY	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0009	WRONG COLOR IDENTIFICATION OF CABLES	Linari Stefano	SUPPLIER COES	0	SUPPLY	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0010	SPOOLS DAMAGED DURING BLASTING	Degli Esposti Raffaele	Sintoni Viola	0	FABRICATION	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0011	UNPROPER DISTRIBUTION ON SITE OF WELDING CONSUMABLES	Patane Mario	Patane Mario	0	WELDING MANAGEMENT	Closed	
123A90	CROSSWIND C.V.	2024-Q-123A90-0012	HANDRAILS INCORRECT APPLICATION OF HDG - GALVANIZING COAT PEELING OFF	Patane Mario	Sintoni Viola	0	SUPPLY	Closed	
123A90	CROSSWIND C.V.	2025-Q-123A90-0001	PO.1724000428 _INSTRUMENT AIR PACKAGE _WATER DETECTED INSIDE THE COMPRESSORS	Linari Stefano	Degli Esposti Raffaele	0	SUPPLY	Closed	
123A90	CROSSWIND C.V.	2025-Q-123A90-0002	BLASTING ON FLANGE PRESSURE RETAINING SURFACES	Patane Mario	Sintoni Viola	0	CONSTRUCTION	Closed	
123A90	CROSSWIND C.V.	2025-Q-123A90-0003	DISCREPANCY IN H2 STORAGE TANKS LOCATION	Degli Esposti Raffaele	Degli Esposti Raffaele	0	CONSTRUCTION	Closed	
123A90	CROSSWIND C.V.	2025-Q-123A90-0004	FAULT OF MV CABLE TERMINATIONS ON BESS	Marchetti Sofia	Degli Esposti Raffaele	0	CONSTRUCTION	Closed	
123A90	CROSSWIND C.V.	2025-Q-123A90-0005	FAILURE TO INSPECT PIPING LINES BEFORE INSULATION	Novaga Lorenzo	Degli Esposti Raffaele	0	MECHANICAL COMPLETION	Closed	
123A90	CROSSWIND C.V.	2026-Q-123A90-0001	LACK OF REQUIRED MATERIAL CERTIFICATES TRACEABILITY FOR TRANSFORMER MAIN COMPONENTS	Zanellati Filippo	Degli Esposti Raffaele	0	SUPPLY	Closed	

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0001 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** SCANDIUZZI STEEL CONSTRUCTION SPA

Process: QUALITY CONTROL	**Procedure:** EEMUA 158 - 2014 K559-2254-MT-SPE-001
Activity: NDE	
Short Title: RT CHECK NOT PROPERLY PERFORMED	

Description:

During the review of the radiographs taken by Scandiuzzi on welds (see attached welding register and drawing), it was observed that the technique used did not cover the entire joint.
Consequently, Rosetti repeated the radiographic inspection at the Ravenna site using a technique that allowed for the examination of the previously unchecked portion.
The outcome was that unacceptable indications were found in 3 of the welds.

Noted by:	Sortino Enzo	**Role:**	PQCC	**Date:**	21/02/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	22/02/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: INCORRECT NON-DESTRUCTIVE TESTING TECHNIQUE

Notes:

(1) The extension of the percentage of RT checks to be performed shall be evaluated based on the contractual specification K559-2254-MT-SPE-001 STRUCTURAL STEEL FABRICATION, which, in Table 2, refers to the criteria defined in ISO 19902:2020 # A.20.3.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Areas affected by unacceptable indications must be repaired.	Sortino Enzo	04/03/2024	26/02/2024	
Repeat the checks required by the specification on the repaired joints (RT and UT 100%). Also cross check with UT of all 7 joints performed and controlled by Scandiuzzi.	Sortino Enzo	04/03/2024	07/03/2024	
Verify the contractual requirements for the extension of the percentage of RT (Radiographic Testing) checks to be performed. See note (1) above.	Sortino Enzo	04/03/2024	28/02/2024	
Instruct Scandiuzzi operators on the appropriate technique to cover the entire joint.	Comandini Massimo	16/02/2024	22/02/2024	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	22/02/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	22/02/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	15/03/2024

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0001 rev. 0

Effective Closing Date: 07/03/2024

Client's / AI Approval: **Role:** **Date:**

Notes:

- The welds involved were repaired by Rosetti.

- RT (Radiographic Testing) and UT (Ultrasonic Testing) inspections were performed after the repairs, with positive results.

- A cross-check with 100% UT was conducted on the 7 welds involved in the NC

- The correct technique to be used was communicated to Scandiuzzi (see attached email). The films from the inspections carried out by Rosetti was shown to Scandiuzzi operators during a meeting at Scandiuzzi's premises.

- Upon reviewing Scandiuzzi's repair rate for welds inspected with RT (a total of 13), calculated in accordance with ISO 19902, section A.20.3, it was found to be 3.4%. This indicates that an extension of the radiographic inspection is not required.

- Welding register updated after repair is attached.

Distribution: LUCCHI ALBERTO - EXP; - SCANDIUZZI - VENDOR/SUB-CONTRACTOR; CROSSWIND - CLIENT; BORGHI WOLMER - CM;

Rosetti Marino S.p.A.

Elenco Saldature con Riparazione

Requests done:

Job:	123A90	BASE LOAD POWER HUB (BLPH)			
From Discipline:					
To Discipline:					
Drawings		**From:**		**To:**	
Material		**From:**		**To:**	
Welds Execution Date		**From:**	07-02-2024	**To:**	07-02-2024
Welds Acceptance Date		**From:**	- -	**To:**	- -
Report Date		**From:**	- -	**To:**	- -
Location		**From:**	-	**To:**	-
Prefabrication/Erection:	All				
ITEM		**From:**		**To:**	
		From:		**To:**	

Elenco Saldature con Riparazione

Job: 123A90 BASE LOAD POWER HUB (BLPH)
Client: CRWIND CROSSWIND **Order Number:** CW-I-WP4-2023-05
Discipline: ST Structure **ITEM**

Weld Number / Class	Prod. Date / Insp.	Fog.Prod. / Category	Welders / Examina	Examination phase	Item type	Dimension / Exam. %	Thickness / Report n.	Bevel / Films n.	Weld Length / Result	P/M	Material / Repair length	WPS / Report	Conn. type / Date	NOTE	Accept. Date
1/90013/1/CWLPG014	**07-02-2024**	**5**	**AX25**	**Repair done**	**PL**	**300,00 MM**	**25,00 mm**	**1/2V**	**0,30 m**	**P**	**C.S.**		**BW**		**07-03-2024**
I			VIS	FIT-UP and on weld completion		100 %	OK		A		m	07-02-2024			
			UT	Weld Completion		100 %			A		m	- -			
			RT	Weld Completion		10 %	000011	2	R		0,120 m	19-02-2024			
			MT	Weld Completion		100 %			A		m	- -			
			VIS	After Repair		100 %	OK		A		m	26-02-2024			
			UT	After Repair		100 %	000479		A		m	07-03-2024			
			RT	After Repair		10 %	000029	1	A		m	28-02-2024			
			MT	After Repair		100 %	001390		A		m	07-03-2024			
			Ref. dossier SCANDIUZZI - 1723000223												

Totals per Drawing

Prefabrication	**0,30 m**
Erection	**m**
Performed	**0,30 m**
Accepted	**0,30 m**
Repaired	**0,12 m**

Elenco Saldature con Riparazione

Job: 123A90 BASE LOAD POWER HUB (BLPH)
Client: CRWIND CROSSWIND **Order Number:** CW-I-WP4-2023-05
Discipline: ST Structure **ITEM**

Weld Number / Class	Prod. Date / Insp.	Fog.Prod. / Category	Welders / Examina	Examination phase	Item type	Dimension / Exam. %	Thickness / Report n.	Bevel / Films n.	Weld Length / Result	P/M	Material / Repair length	WPS / Report	Conn. type / Date	NOTE	Accept. Date
2/90180/1/CWLPG022	**07-02-2024**	**50**	**AX25**	**Repair done**	**PL**	**300,00 MM**	**25,00 mm**	**1/2V**	**0,30 m**	**M**	**C.S.**		**BW**		**07-03-2024**
I			VIS	FIT-UP and on weld completion		100 %	OK		A		m	07-02-2024			
			UT	Weld Completion		100 %			A		m	- -			
			RT	Weld Completion		10 %	000012	2	R		0,060 m	19-02-2024			
			MT	Weld Completion		100 %			A		m	- -			
			VIS	After Repair		100 %	OK		A		m	26-02-2024			
			UT	After Repair		100 %	000481		A		m	07-03-2024			
			RT	After Repair		10 %	000025	2	A		m	26-02-2024			
			MT	After Repair		100 %	001392		A		m	07-03-2024			
6/90180/1/CWLPG031	**07-02-2024**	**50**	**AX25**	**Repair done**	**PL**	**250,00 MM**	**20,00 mm**	**1/2V**	**0,25 m**	**M**	**C.S.**		**BW**		**07-03-2024**
I			VIS	FIT-UP and on weld completion		100 %	OK		A		m	07-02-2024			
			UT	Weld Completion		100 %			A		m	- -			
			RT	Weld Completion		10 %	000013	2	R		0,010 m	19-02-2024			
			MT	Weld Completion		100 %			A		m	- -			
			VIS	After Repair		100 %	OK		A		m	26-02-2024			
			UT	After Repair		100 %	000482		A		m	07-03-2024			
			RT	After Repair		10 %	000027	2	A		m	26-02-2024			
			MT	After Repair		100 %	001393		A		m	07-03-2024			

Totals per Drawing	**Prefabrication**	**m**
	Erection	**0,55 m**
	Performed	**0,55 m**
	Accepted	**0,55 m**
	Repaired	**0,07 m**
Totals per Discipline	**Prefabrication**	**0,30 m**
	Erection	**0,55 m**
	Performed	**0,85 m**
	Accepted	**0,85 m**
	Repaired	**0,19 m**

Elenco Saldature con Riparazione

Job: 123A90 BASE LOAD POWER HUB (BLPH)
Client: CRWIND CROSSWIND
Order Number: CW-I-WP4-2023-05
Discipline: ST Structure
ITEM

Weld Number	Class	Prod. Date	Insp. Category	Fog.Prod.	Welders	Examina	Examination phase	Item type	Dimension	Exam. %	Thickness	Report n.	Bevel	Films n.	Weld Length	Result	P/M	Material	Repair length	WPS	Report	Date	Conn. type	NOTE	Accept. Date
Totals per Job									**Prefabrication**						**0,30 m**										
									Erection						**0,55 m**										
									Performed						**0,85 m**										
									Accepted						**0,85 m**										
									Repaired						**0,19 m**										

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0003 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** BREMBANA & ROLLE

Process: SUPPLY MANAGEMENT	**Procedure:** 1723001756-QC-ITP-00002 "INSPECTION AND TEST PLAN - H2 STORAGE VESSEL"
Activity: VENDOR ITP MANAGEMENT	
Short Title: FAILURE TO NOTIFY SUBCONTRACTED ACTIVITY TO EXTERNAL COMPANY	

Description:

It was identified that our supplier, Membrana & Rolle, outsourced plate rolling activities to an external workshop, Officine Mattiello, without prior notification to our quality management team. There is uncertainty regarding whether welding activities were also performed at Officine Mattiello. The only confirmed evidence is that rolling was conducted.

Noted by:	Sortino Enzo	**Role:**	PQCC	**Date:**	15/04/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	18/04/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF INFORMATION OR COMMUNICATION

Notes:

QUALITY PROCESS INVOLVED
1. Communication Protocols:
- Failure to notify our company of the change in the production process.
- Non-compliance with approval protocols for using external facilities.
2. Quality Assurance and Control:
- Missing verification and validation by Rosetti of the external workshop (Officine Mattiello) caused by the lack of information from B&R.
- Potential deviation from established inspection and testing procedures.

ACTIVITY INVOLVED:
- Rolling of plates was confirmed.
- Uncertainty regarding any welding activities.

IMPACT ANALYSIS:
Potential Impact on the Project:
- Possible delays due to the need for additional inspections and validations.
- Risk of non-compliance with project specifications and quality standards.

Affected Deliverables:
- Components processed at Officine Mattiello are subject to review and re-inspection.

ROOT CAUSE ANALISYS:
Lack of communication from Membrana & Rolle regarding the use of external facilities for production activities

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Rolling and Welding: It has been agreed to perform rolling of a plate and proceed with its welding at Officine Mattiello according to a Welding Procedure Specification (WPS), supported by a Procedure Qualification Record (PQR) overseen by the Notified Body ASME.	SUPPLIER BREMBANA & ROLLE	15/07/2024	15/07/2024	
nspection of Welded Courses: The welds on courses rolled at Officine Mattiello will be re-inspected using the techniques outlined in the Inspection and Test Plan (ITP).	SUPPLIER BREMBANA & ROLLE	15/07/2024	15/07/2024	

Production Weld Testing: Once the PQR is approved by the ASME Authorized Inspector (AI), proceed with welding the course and simultaneously prepare a production weld test piece (tallone di produzione). Destructive tests on this piece will be conducted in the presence of the Responsible Welding Supervisor (ROS) and Company Welding Inspector (CW).	SUPPLIER BREMBANA & ROLLE	15/07/2024	15/07/2024	
PREVENTIVE ACTION: • Strengthen communication protocols to ensure mandatory notifications for any changes in the production process. • Implement audits plan and reviews of B&R compliance with project procedures and specifications	Degli Esposti Raffaele	15/07/2024	15/07/2024	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	10/05/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	10/05/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	18/07/2025
Effective Closing Date:	15/07/2024				
Client's / AI Approval:		**Role:**		**Date:**	

Notes:

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0004 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** N/A

Process: SUPPLY MANAGEMENT	**Procedure:** 123A90-PML-QHSE-RE-00093_Rev02
Activity: PAINTING / COATING	
Short Title: HANDRAILS WITH INCORRECT RAL	

Description:

The handrails already installed on BLPH have been painted with the incorrect RAL colour. The correct RAL colour is 1016, while the handrails have been painted with RAL 1023.

Noted by:	Sintoni Viola	**Role:**	QCI	**Date:**	06/08/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	07/08/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF CONTROL OR MONITORING

Notes:

Root Cause Analysis: Refer to Attachment 1

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Supervise the completion of the actions stated in Attachment 1.	Degli Esposti Raffaele	30/09/2024		

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	07/08/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	07/08/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	
Effective Closing Date:					
Client's / AI Approval:		**Role:**		**Date:**	

Notes:

Distribution: Borghi Wolmer - CM; Brunelli Massimiliano - PM; Renesto Alberto - QSPM; CROSSWIND - CLIENT;

ATTACHMENT 1: NCR MANAGEMENT

1. Root Cause Analysis

Root Causes Identified:

a) **Misinterpretation in Reviewing Specifications:**

- The painting sub-contractor received the specification document detailing the correct RAL colours to be applied. It appears the document was not thoroughly reviewed and misinterpreted, leading to the incorrect application of RAL 1023 instead of the specified RAL 1016.

b) **Lack of Confirmation from the Painting sub-contractor:**

- The painting sub-contractor did not seek confirmation of the correct RAL colour from ROSETTI, leading to an assumption that the applied colour was correct.

c) **Inadequate Inspection by Painting sub-contractor Inspector:**

- The inspector assigned by the painting sub-contractor failed to ensure that the correct RAL colour was used during the painting process.

d) **Insufficient Verification by Rosetti Inspector:**

- The Rosetti inspector responsible for releasing the items did not verify the RAL colour, resulting in the approval of handrails painted with the wrong colour.

Additional Observations:

- Both RAL 1016 and RAL 1023 are shades of yellow, but they differ in tone. This similarity may have contributed to the oversight.

Conclusion:

The primary root cause of the non-conformity is attributed to inadequate attention to detail and a lack of thoroughness in both the interpretation of the specifications and the inspection process. To prevent recurrence, enhanced focus on specification review and rigorous inspection protocols are recommended.

2. Impact Assessment

- **Impact on Project:**
  - Potential delays and additional costs associated with repainting.
  - Minor aesthetic discrepancy due to the different shades of yellow (RAL 1016 and RAL 1023).

3. Immediate Corrective Action

Given the high impact on project timelines that would result from repainting the handrails, we propose to implement the following solution to address the non-conformity:

a) Accept the Applied RAL 1023:

- The handrails painted with RAL 1023 will be accepted as they are. This decision is made to avoid the significant delays and additional costs associated with repainting all the handrails to the originally specified RAL 1016.

ACTION OWNER: CONSTRUCTION MANAGER

b) Repaint Handrails with RAL 1016 to Match RAL 1023:

- The few meters of handrails that have been painted with the correct RAL 1016 will be repainted with RAL 1023 to ensure uniformity in colour across all handrails.

ACTION OWNER: CONSTRUCTION MANAGER

These solutions effectively mitigates the issue by standardizing the colour of all handrails to RAL 1023, thereby dramatically reducing the problem's impact on the project timeline.

c) Revise the procedure to reflect the change made:

- Update the relevant procedure documents to include the newly applied RAL colour for the handrails. This ensures that the documented procedures align with the actual changes made during the project.

ACTION OWNER: QUALITY SURFACE PROTECTION MANAGER

d) Issue a DR to formalize the change of RAL for the Deck handrails:

- Create and distribute an official DR that formalises the change in the RAL colour for the Deck handrails. This step ensures that all involved parties are informed and that the change is officially recorded.

ACTION OWNER: PROJECT QUALITY MANAGER

REMARK: It should be understood that while the colours will be consistent within the deck and the transition piece (TP), they will differ in shades of yellow. Specifically, the TP has handrails painted with the RAL 1016. As a result, the outcome will be that the handrails on the deck and the TP will display different shades of yellow.

4. Actions to Prevent Recurrence

To avoid similar non-conformities in the future, we implement the following actions:

a) **Enhance Specification Review Procedures:**

- Implement a mandatory double-check process for reviewing specifications. Both the contractor and the painting sub-contractor's team should verify the specified RAL colours before commencing any work.

b) **Confirmation Requirement:**

- Require the painting sub-contractor to seek written confirmation from ROSETTI for the RAL colours to be applied. This step ensures clarity and eliminates assumptions.

c) **Strengthen Inspection Protocols:**

- Improve the inspection protocols for both the painting sub-contractor and Rosetti inspectors. This includes:
  - Training inspectors to meticulously verify colour codes against the specifications.
  - Implementing a checklist for inspectors to ensure all aspects, including colour verification, are thoroughly checked.

5. Lesson Learned Documentation:

Document this non-conformity and the corrective actions in a "Lesson Learned" report. This report should be shared across all relevant teams to raise awareness and prevent similar issues in the future.

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0005 rev. 0

DESCRIPTION

Project:	123A90	Client:	CROSSWIND C.V.	Originator: VENDOR	Subcontractor name: FEMI-CZ SPA

Process:	SUPPLY MANAGEMENT	Procedure:	Po,1724001133
Activity:	INSPECTION		
Short Title:	CABLE TRAYS WITH BURN DAMAGES		

Description:

This is to inform that some ITEMs of the Femi-Cz (PO 1724001133) were delivered unsuitable for construction (had parts with burns damages).

Below the list of the positions in subject with damages:
POS 70 1EQP296 18 PC (FOTO N 1)
POS 90 1EQP296 6 PC (FOTO N 2)
POS 110 1EQP296 6 PC (FOTO N 3)
POS 130 1EQP296 12 PC (FOTO N 4)
POS 150 1EQP296 25 PC (FOTO N 5)
POS 170 1EQP296 6 PC (FOTO N 6)
POS 190 1EQP296 3 PC (FOTO N 7)
POS 210 1EQP296 12 PC (FOTO N 8)
POS 370 1EQP296 7 PC (FOTO N 9)
POS 390 1EQP296 40 PC (FOTO N 10)
POS 410 1EQP296 10 PC (FOTO N 11)
POS 430 1EQP296 22 PC (FOTO N 12)

Noted by:	MARCHETTI SOFIA	Role: E/I CM	Date: 21/08/2024
Accepted by:	Linari Stefano	Role: SQL	Date: 21/08/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF CONTROL OR MONITORING

Notes:

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
We pickled directly in the yard a piece of these which I attach the photo of the first pickling and after pickling. We are proceeding with pickling the others too so as not to interrupt the construction	MARCHETTI SOFIA	31/08/2024	31/08/2024	

Defined by:	MARCHETTI SOFIA	Role: E/I CM	Date: 21/08/2024
Approved by:	Linari Stefano	Role: SQL	Date: 21/08/2024
Client's / AI Approval:		Role:	Date:

COMPLETION

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0005 rev. 0

Checked by:	Linari Stefano	**Role:**	SQL	**Date:**	31/08/2024
Effective Closing Date:	31/08/2024				
Client's / AI Approval:		**Role:**		**Date:**	
Notes:					
Distribution:					

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0006 rev. 1

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** GRI RENEWABLE INDUSTRIES

Process: SUPPLY MANAGEMENT	**Procedure:** 1724000344-QC-PRO-00002 / INSPECTION TEST PLAN (ITP) - TRANSITION PIECE FLANGE
Activity: SUPPLY INSPECTIONS	
Short Title: FAILURE TO NOTIFY INTERVENTION POINT	

Description:

Notification number NOI form 070524 FIHI R0, issued by GRI to inform about the activities scheduled in the ITP, which include W intervention points, was sent on May 7th.
Inspections were scheduled for the following day, May 8th. Therefore, the required two-week advance notice was not respected.

Noted by:	Linari Stefano	**Role:**	SQL	**Date:**	10/05/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	20/05/2024

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF INFORMATION OR COMMUNICATION

Notes:

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Informare il rappresentante del Cliente e concordare la gestione delle ispezioni notificate.	Linari Stefano	07/05/2024	07/05/2024	
Organizzare l'intervento di un ispettore incaricato da Rosetti.	Linari Stefano	07/05/2024	07/05/2024	
Distribuire il report dell'ispezione al rappresentante del Cliente	Linari Stefano	14/05/2024	14/05/2024	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	07/05/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	07/05/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	14/05/2024
Effective Closing Date:	14/05/2024				
Client's / AI Approval:		**Role:**		**Date:**	

Notes:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0006 rev. 1

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0007 rev. 0

DESCRIPTION

Project:	123A90	**Client:**	CROSSWIND C.V.	**Originator:** VENDOR		**Subcontractor name:** C.A.M.P.I. Srl	
Process:	SUPPLY MANAGEMENT			**Procedure:**	1724000163-QC-PRO-00010: HYDROSTATIC TEST PROCEDURES AND PNEUMATIC TEST PROCEDURE (FAT PROCEDURE) 1724000163-MD-LIS-00001: SUPPLIER MASTER INDEX REGISTER (SMIR) 1724000163-QC-ITP-00002: INSPECTION AND TEST PLAN		
Activity:	QC INSPECTIONS						
Short Title:	EXECUTION OF HYDROSTATIC TEST WITH TEST PROCEDURE AND ITP NOT APPROVED UNDER CODE 1						

Description:

On September 18, 2024, an "health check" was conducted at C.A.M.P.I. Srl, the supplier of the H2 KO Drum for the BLPH project. Concurrently, a notification for the execution of the final hydrostatic test following the PWHT (Post Weld Heat Treatment) was issued.

One of the key aspects of the health check was to review the activities leading up to the final hydrostatic test phase, including the verification of the approval status of the related documentation. During the review, it was found that almost all the documents under verification were marked with approval code 2 by Crosswind. It is important to note that although code 2 does not block activities, the high number of documents affected by this code, many of which had significant comments, were not addressed. No responses were provided, nor were the comments discussed.

As a result, the hydrostatic test was conducted, with the Notified Body (NO.BO.) present due to the PED (Pressure Equipment Directive) stamp, without having at least the procedure and the ITP (Inspection Test Plan) in approval code 1 (approved).

Please be informed that the test was nevertheless successful.

Noted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	18/09/2024
Accepted by:	Degli Esposti Raffaele	**Role:**		**Date:**	23/09/2024

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: DOCUMENTATION NOT APPROVED

Notes:

REFER TO THE ATTACHED NOTES

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Respond to comments received on documents and revise accordingly	SUPPLIER C.A.M.P.I.	27/09/2024	31/10/2024	
Hold the HT report until comments are closed. Vessel is still accepted with reservation.	Degli Esposti Raffaele	07/10/2024	31/10/2024	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	23/09/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	23/09/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	31/10/2024

Effective Closing Date:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0007 rev. 0

Client's / AI Approval:	Role:	Date:

Notes:

The client has approved the documents in code 1- Refer to the ACONEX Client DataBase

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0007 rev. 0

DESCRIPTION					
Project:	123A90	**Client:**	CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** C.A.M.P.I. Srl
Process:	SUPPLY MANAGEMENT			**Procedure:**	1724000163-QC-PRO-00010: HYDROSTATIC TEST PROCEDURES AND PNEUMATIC TEST PROCEDURE (FAT PROCEDURE) 1724000163-MD-LIS-00001: SUPPLIER MASTER INDEX REGISTER (SMIR) 1724000163-QC-ITP-00002: INSPECTION AND TEST PLAN
Activity:	QC INSPECTIONS				
Short Title:	EXECUTION OF HYDROSTATIC TEST WITH TEST PROCEDURE AND ITP NOT APPROVED UNDER CODE 1				

Root Cause Analysis:

The main causes that led to the non-conformity include:

1. **Inadequate Documentation Management**:
    - Critical documentation (hydrostatic test procedure, ITP, welding, and NDT procedures) was not adequately managed to ensure completion and approval within the required timeframes. This is due to ineffective monitoring of the document review process and a lack of clear tracking of approvals.
2. **Insufficient Communication Between Departments**:
    - The failure to discuss and resolve comments on documents suggests poor communication and collaboration within CAMPI organization. Comments on the documents were not addressed promptly, indicating a breakdown in communication management.
3. **Incomplete or Unfollowed Quality Control Procedures**:
    - There were no effective control mechanisms to verify the approval status of the documentation before proceeding with the hydrostatic test. This indicates potential gaps in the quality control procedures, where adequate checkpoints were not established to ensure document readiness.
4. **Pressure to Meet Delivery Deadlines**:
    - The decision to proceed with the test despite unapproved documentation may have been influenced by project delivery pressures and deadlines. The urgency to meet schedules overshadowed compliance with documentation processes.

Corrective Actions:

1. **Enhance Use of Rosetti Fusion Live Database**:
    - Leverage the existing Rosetti Fusion Live database more effectively to monitor and track the approval status of critical documents.
2. **Improve Internal Communication**:
    - Establish regular communication channels to ensure that comments on critical documents are discussed and resolved promptly.

DESCRIPTION					
Project:	123A90	**Client:**	CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** C.A.M.P.I. Srl
Process:	SUPPLY MANAGEMENT			**Procedure:**	1724000163-QC-PRO-00010: HYDROSTATIC TEST PROCEDURES AND PNEUMATIC TEST PROCEDURE (FAT PROCEDURE) 1724000163-MD-LIS-00001: SUPPLIER MASTER INDEX REGISTER (SMIR) 1724000163-QC-ITP-00002: INSPECTION AND TEST PLAN
Activity:	QC INSPECTIONS				
Short Title:	EXECUTION OF HYDROSTATIC TEST WITH TEST PROCEDURE AND ITP NOT APPROVED UNDER CODE 1				

3. **Implement Pre-Test Document Status Verification**:
    - Rosetti must conduct a thorough review of the approval status of all relevant documents before accepting any test notifications.
4. **Managing Project Timelines**:
    - While adjusting project deadlines can be challenging, it is crucial to try to balance schedule pressures with compliance and safety standards.

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0008 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** PSC

Process: SUPPLY	**Procedure:** - PO 1724000448 - WATER TREATMENT PACKAGE - 1724000448-MAT-PRO-00023_REV.03_PAINTING SPECIFICATION FOR CONTAINER
Activity: PAINTING / COATING INSPECTIONS	
Short Title: DOOR SEALS ARE CONTAMINATED & WELDING SPATTERS ARE PAINTED OVER	

Description:

Surface preparation activities complied with ISO 12944. Inspection records were satisfactorily completed, but physical inspection of the container showed some issues:
- door seals contaminated during painting activities
- visible welding spatters painted over

Noted by:	Linari Stefano	**Role:**	SPQI	**Date:**	28/10/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	29/10/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF CONTROL OR MONITORING

Notes:

1. Poor Workmanship: The issues observed, such as contamination of door seals and welding spatters painted over, suggest that the work was conducted with inadequate attention to detail.

2. Lack of Quality Control by Vendor Inspectors: It appears that the vendor's inspectors failed to halt the painting activities despite the visible surface defects. This indicates a lapse in enforcing quality protocols, which should have ensured that painting only commenced on properly prepared surfaces.

3. Insufficient Visual Inspection: A visual inspection should have been performed before the start of the painting process. The failure to conduct this essential step led to substandard surfaces being painted over, compromising the overall quality and compliance of the package.
These factors collectively reflect a breakdown in oversight and execution, which impacts process integrity and final product quality.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Remove all painting in all door seals	VENDOR PSC	15/11/2024	25/11/2024	
Remove splatters and restore surface protection in the accessible area	VENDOR PSC	15/11/2024	25/11/2024	

Defined by:	Linari Stefano	**Role:**	PQM	**Date:**	28/10/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	28/10/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Linari Stefano	**Role:**	SQL	**Date:**	25/11/2024
Effective Closing Date:					
Client's / AI Approval:		**Role:**		**Date:**	

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0008 rev. 0

Notes:

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0009 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** COES

Process: SUPPLY

Activity: ASSEMBLING

Short Title: WRONG COLOR IDENTIFICATION OF CABLES

Procedure: COES - PO - 1724000428 - INSTRUMENT AIR PACKAGE: 1724000428-MAC-DG-00009 _ PACKAGE WIRING DIAGRAM INCLUDING LAYOUT OF PACKAGE CONTROL PANEL 63-LP-001 - INSTRUMENT AIR PACKAGE A-63000

COES/PO - 1724000437 - NITROGEN GENERATION PACKAGE: 1724000437-MAC-DG-00009 _ PACKAGE WIRING DIAGRAM INCLUDING LAYOUT OF PACKAGE CONTROL PANEL - NITROGEN GENERATION PACKAGE

Description:

A non-conformity was identified during the FAT (Factory Acceptance Test) by Rosetti's inspector. The inspector observed that the wiring inside both control panels was entirely black, whereas the color coding was specified differently according to two referenced documents issued by COES and approved by both Rosetti and the Client (CPY). The required color coding is as follows:

Power Circuits: Black
AC Auxiliary Circuits: Red
DC Auxiliary Circuits: Blue
Circuits Not Isolated by General Device: Orange
The discrepancy indicates a failure to adhere to specified wiring standards, which could lead to significant operational and safety issues. This non-conformity likely results from a lack of attention to detail during the wiring process and inadequate verification against the approved documentation prior to FAT. This oversight emphasizes the need for stricter adherence to procedural compliance and a more rigorous quality control process.

Noted by:	Linari Stefano	**Role:**	SQL	**Date:**	30/10/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	30/10/2024

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF CONTROL OR MONITORING

Notes:

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Revise the documents no. 1724000428-MAC-DG-00009 & 1724000428-MAC-DG-00009	SUPPLIER COES	09/12/2024	13/12/2024	

Defined by:	SUPPLIER COES	**Role:**		**Date:**	04/11/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	08/11/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	17/12/2024

Effective Closing Date:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0009 rev. 0

Client's / AI Approval:	Role:	Date:
Notes:		
Distribution:		

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0010 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** TREZETA SERVICE S.r.l.

Process: FABRICATION	**Procedure:** 23A90-PML-QHSE-RE-00093_Surface Protection Procedure
Activity: SURFACE PROTECTION	Good industrial practice
Short Title: SPOOLS DAMAGED DURING BLASTING	

Description:

During the blast cleaning activities performed on the listed spools, the flanges were damaged to the extent that repair is not feasible. Consequently, new spools must be manufactured to replace the damaged ones.
23-b
23-c
25-c
26-c
150-b

Refer to the attached pictures.

Noted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	31/10/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	31/10/2024

MANAGEMENT

☐ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: FAILURE IN PROCEDURE REQUIREMENTS APPLICATION

Notes:

Given the clear procedural requirements specifying that flanges should not undergo blasting, the root cause of this non-conformity can be attributed primarily to poor workmanship and inadequate supervision by Trezeta. Specifically:

Workmanship Deficiency: Operators did not adhere to the procedural mandate to protect flange surfaces, indicating a gap in either skill or attentiveness to sensitive components.

Lack of Effective Supervision: Trezeta's management appears to have lacked sufficient oversight of the operators, failing to ensure adherence to the procedure for protecting flanges during surface preparation.

Inadequate Quality Control: Trezeta's quality control measures did not adequately detect or prevent this procedural deviation, allowing the damage to occur and necessitate costly replacement of the spools.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Oversee the complete fabrication process of the replacement spools	Borghi Wolmer	29/11/2024	12/12/2024	
Assume responsibility for the replacement spool costs in alignment with the back charge notes prepared by Rosetti.	SUBCONTRACTOR TREZETA srl	29/11/2024	19/12/2024	

Defined by:		**Role:**	PQM	**Date:**	31/10/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	31/10/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0010 rev. 0

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	23/12/2024
Effective Closing Date:	19/12/2024				
Client's / AI Approval:		**Role:**		**Date:**	
Notes:					
Distribution:					

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0011 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** RODEO SRL

Process: WELDING MANAGEMENT	**Procedure:** Welding consumbales management procedure 123A90-PML-WEL-PRO-05007
Activity: MATERIAL HANDLING	
Short Title: UNPROPER DISTRIBUTION ON SITE OF WELDING CONSUMABLES	

Description:

During the internal audit planned along with CPY, it has been found that GTAW consumables as per WPS D1A, Esab OK TIGROD 316L, as well as SMAW electrodes ESAB FILARC 88S, were distributed for site construction without proper outlet registration from the warehouse. Uncontrolled distribution of welding consumables to site construction is not allowed.
Another point to be considered as improvement action is to divide the consumables by the different projects inside the warehouse. It has been noted that currently the consumables are mixed and not clearly identifiable.

Noted by:	Patane Mario	**Role:**	PQM	**Date:**	12/11/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	13/11/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF CONTROL OR MONITORING

Notes:

The actions identified below must be implemented immediately. A verification of the implementation will be conducted on Thursday, November 14.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Ensure access to the electrode storage area is limited to authorized individuals, such as the foreman.	Rodeo Srl Subcontractor	13/11/2024	25/11/2024	
All consumable deliveries must be logged immediately and verified against warehouse records.	Rodeo Srl Subcontractor	13/11/2024	25/11/2024	
Physically separate consumables for different projects and clearly label storage areas to avoid mix-ups.	Rodeo Srl Subcontractor	13/11/2024	25/11/2024	
Conduct training sessions for all relevant staff to emphasize compliance with established procedures and the importance of proper material handling.	Rodeo Srl Subcontractor	15/11/2024	25/11/2024	
Conduct regular audits to verify adherence to consumable management procedures and maintain control over materials.	Patane Mario	15/11/2024	25/11/2024	

Defined by:	Patane Mario	**Role:**	PQM	**Date:**	13/11/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	13/11/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0011 rev. 0

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	26/11/2024
Effective Closing Date:					
Client's / AI Approval:		**Role:**		**Date:**	

Notes:

Regular audits will be conducted on the field and in the warehouse to verify the continuity of the control over the consumables delivery.

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0012 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** OMC MONTAGGI SRL

Process: SUPPLY	**Procedure:** Coating and Painting specification 123A90-DDL-MAT-SP-60006
Activity: PAINTING / COATING INSPECTIONS	
Short Title: HANDRAILS INCORRECT APPLICATION OF HDG - GALVANIZING COAT PEELING OFF	

Description:

During the surface preparation (garnett grit - Low pressure) of the handrails fabricated by OMC Montaggi SRL, it has been observed that the hot dip galvanization applied, as a base layer coat before applying the painting system 6B as per approved procedure, has not been correctly applied and it peels off during the first sweep blasting activities.
This is a not acceptable condition as the painting cycle to be applied on top will start to peel off along with the unproper galvanizing coat.

Noted by:	Patane Mario	**Role:**	PQM	**Date:**	14/11/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	14/11/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: FAILURE IN PROCEDURE REQUIREMENTS APPLICATION

Notes:

The actions identified below must be put in place in order to have an acceptable finishing of the handrails.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Review, accept and confirm the rework activities by RM and its backcharges.	OMC MONTAGGI Srl	18/11/2024	22/11/2024	
Proceed with full sandblasting removal of the HDG coat from the handrails	Sintoni Viola	18/11/2024	22/11/2024	
Apply a new coat of epoxy zinc to restore the protection on the handrails	Sintoni Viola	18/11/2024	22/11/2024	
Fully apply the coating system 1 (structural system) on the handrails with final RAL 1023	Sintoni Viola	18/11/2024	22/11/2024	

Defined by:	Sintoni Viola	**Role:**	QCI	**Date:**	15/11/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	15/11/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	10/12/2024
Effective Closing Date:	22/11/2024				
Client's / AI Approval:		**Role:**		**Date:**	

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2024-Q-123A90-0012 rev. 0

Notes:

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0001 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** COES
Process: SUPPLY		**Procedure:**	
Activity: N/A			
Short Title: Po.1724000428 _INSTRUMENT AIR PACKAGE _WATER DETECTED INSIDE THE COMPRESSORS			

Description:

It has been observed that water entered Compressor B after rainfall. The attached photograph shows inadequate sealing of the compressor's enclosure, raising concerns about its suitability for operation in an outdoor environment.

Noted by:	Linari Stefano	**Role:**	SQL	**Date:**	30/12/2024
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	30/12/2024

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: NOT CONFORMING SUPPLY

Notes:

Under instructions from the supplier COES, communicated via email on December 19, the compressor was not put into operation.
The intervention of an Atlas representative on-site was awaited to evaluate the situation and proceed with the machine's startup.
The representative's visit took place on December 23, 2024, and a COES representative was also present (refer to the email summarizing the assessment results).

The resolution of the issue will be divided into two phases:

The development of a temporary solution to enable the execution of Commissioning activities.
The definition of a permanent solution to ensure the package is fully suitable for outdoor use.
Remedial actions have not been defined yet, as the issue's resolution is still under development.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
REFER TO NOTES	Linari Stefano	31/01/2025	31/01/2025	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	30/12/2024
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	30/12/2024
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	21/02/2025
Effective Closing Date:	31/01/2025				
Client's / AI Approval:		**Role:**		**Date:**	

Notes:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0001 rev. 0

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0002 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** SUBCONTRACTOR	**Subcontractor name:** TREZETA SERVICE S.r.l.

Process: CONSTRUCTION	**Procedure:** 123A90-PML-QHSE-RE-00093 - SURFACE PROTECTION PROCEDURE ASME B16.5 Pipe Flanges and Flanged Fittings
Activity: PAINTING / COATING INSPECTIONS	
Short Title: Blasting on Flange Pressure Retaining Surfaces	

Description:

During a routine inspection it has been observed that the pressure retaining surfaces of piping flanges (machined surfaces) have not been duly protected during blasting activities and they have been damaged. Blasting the machined surface of the flange is not acceptable as the flange will not be capable to withstand pressure anymore.

Noted by:	Patane Mario	**Role:**	PQM	**Date:**	24/01/2025
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	24/01/2025

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: POOR WORKMANSHIP

Notes:

The actions identified below must be implemented immediately. Total costs for the operations are on the supplier.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Verification of the extension of the damages caused by blasting	SUPPLIER TREZETA	31/01/2025	31/01/2025	
Proceed with re-machining of all the damaged surfaces	SUPPLIER TREZETA	07/02/2025	07/02/2025	
Ensure that proper corrective actions are taken for the next batch of piping under painting activities	SUPPLIER TREZETA	14/02/2025	14/02/2025	

Defined by:		**Role:**		**Date:**	
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	24/01/2025
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	14/02/2025
Effective Closing Date:	14/02/2025				
Client's / AI Approval:		**Role:**		**Date:**	

Notes:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0002 rev. 0

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0003 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** ROSETTI MARINO	**Subcontractor name:** N/A

Process: CONSTRUCTION

Activity: ASSEMBLING

Short Title: DISCREPANCY IN H2 STORAGE TANKS LOCATION

Procedure: Base Load Power Hub (BLPH) - Plot Plan - Lower and Upper deck_123A90-DDL-PP-DL-70070 rev.02
Base Load Power Hub (BLPH) Plot Plan - Elevation looking north and East_123A90-DDL-PP-DL-70072 rev.02.

Description:

During the storage tank installation, a discrepancy was identified between the actual tank placement and the originally planned project layout. While the tanks are technically identical and interchangeable, their assigned identification (Tag) does not match the layout indicated in the P&ID and other project documentation. This misalignment affects the traceability of the tanks in relation to engineering documentation and operational tracking.

Noted by: Degli Esposti Raffaele **Role:** PQM **Date:** 17/01/2025

Accepted by: Degli Esposti Raffaele **Role:** PQM **Date:** 17/01/2025

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: WRONG ASSEMBLY OPERATION

Notes:

Root Cause Analysis

The issue arose due to logistical constraints and the necessity to receive the tanks within the required timeframe, considering their large dimensions and extended transportation duration. As a result, the tanks were delivered and installed in an order different from the planned layout, leading to a misalignment of identification tags with the P&ID references. However, this does not affect the functionality or integrity of the tanks.

Corrective Action

To rectify this issue and ensure full traceability, the following action will be implemented:

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Each tank will have its correct Tag number painted on the manways and side panels in accordance with the P&ID references. This identification will be clear, permanent, and aligned with project documentation to avoid any confusion. In addition a plate with the correct Tag will be placed close to the PED and ASME plates. The additional plate will not be fixed to the shell but to the existing plates supports.	Borghi Wolmer	14/03/2025	30/07/2025	
A statement issued by Rosetti will be included in the final dossier, confirming full traceability and ensuring that the identification of each tank is correctly referenced in all project documentation.	Degli Esposti Raffaele	14/03/2025	05/08/2025	

Defined by: Degli Esposti Raffaele **Role:** PQM **Date:** 07/02/2025

Approved by: Degli Esposti Raffaele **Role:** PQM **Date:** 07/02/2025

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0003 rev. 0

Client's / AI Approval:	**Role:**	**Date:**

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	05/08/2025

Effective Closing Date:

Client's / AI Approval:	**Role:**	**Date:**

Notes:

1 - Marking performed and trafolyte tags applied.

2- Refer to the attached statement.

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0004 rev. 0

DESCRIPTION

Project:	123A90	Client:	CROSSWIND C.V.	Originator:	Subcontractor name:
				ROSETTI MARINO	N/A

Process:	CONSTRUCTION	**Procedure:** 123A90-DD-EL-DD-20090 rev.02 "Electrical Typical Installation Details Earthing System"
Activity:	MECHANICAL COMPLETION & COMMISSIONING	
Short Title:	FAULT OF MV CABLE TERMINATIONS ON BESS	

Description:

During commissioning activities on the BESS unit, one of the MV (6.6kV) cable terminations blew out, causing a visible failure with potential safety implications for both personnel and equipment.

This issue was formally raised by the Client in their email dated 19 March 2025, which is attached to this report as supporting evidence.

Location of Non-Conformity:

- System: MV Cable Termination (6.6kV)
- Area: BESS – Switchboard and Field Side
- Component ID: Cable 82005-CEM-1-L1

Noted by:	Marchetti Sofia	**Role:**	E/I CM	**Date:**	19/03/2025
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	19/03/2025

MANAGEMENT

☐ **Use as is** ☒ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: OTHER (PLEASE SPECIFY IN NOTES)

Notes:

Refer to the attached Root Cause Analysis.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Replacement of the damaged MV cable (82005-CEM-1-L1)	Marchetti Sofia	28/03/2025	24/03/2025	The activity has been already completed.
Execution of 5kV DC insulation resistance tests (Megger) on all BESS cables.	Iveson Anthony	28/03/2025	24/03/2025	The test has been carried out. It can be repeated with CW attendance.
Execution of 10kV AC dielectric withstand test on all cables BESS cable	Iveson Anthony	28/03/2025	04/04/2025	
Procurement of spare cable joint kits	Procopio Edoardo	04/04/2025	04/04/2025	
Collect termination kits already available	Marchetti Sofia	28/03/2025	28/03/2025	
Procurement of spare MV cable lengths	Procopio Edoardo	28/03/2025	20/03/2025	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	24/03/2025
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	24/03/2025
Client's / AI Approval:		**Role:**		**Date:**	

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0004 rev. 0

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	11/04/2025
Effective Closing Date:	24/03/2025				
Client's / AI Approval:		**Role:**		**Date:**	
Notes:					
Distribution:					

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0005 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** ROSETTI MARINO	**Subcontractor name:** N/A

Process: MECHANICAL COMPLETION	**Procedure:** 123A90-PML-QHSE-ITP-00074 - INSPECTION AND TEST PLAN FOR SURFACE PROTECTION
Activity: PAINTING / COATING INSPECTIONS	
Short Title: Failure to inspect piping lines before insulation	

Description:

During Mechanical Completion inspections, it was observed that almost the entire line referenced in Test Pack 55-01-TP-003 (Waste Water Brine Discharge System) was not inspected prior to insulation. This violates the ITP for surface protection, which requires inspection before applying insulation.

Noted by:	Novaga Lorenzo	**Role:**	QCI	**Date:**	24/03/2025
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	26/03/2025

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: LACK OF INFORMATION OR COMMUNICATION

Notes:

Root-Cause Analysis
The non-conformity originated from a misalignment between the urgent need to proceed with piping insulation and the required Quality Control (QC) inspection process. Due to commissioning constraints and schedule pressures, insulation activities were expedited without ensuring that the QC painting inspector had been formally notified and involved.

Although application reports for the painting/coating activities were properly issued and are available, the final release step—namely, the formal clearance authorizing the start of insulation—was not executed. This gap in communication and procedural compliance resulted in the QC inspector attempting to carry out the visual inspection only after most of the piping line had already been insulated.

No evidence of deviation from the coating application specifications was found. However, the bypass of the final release for insulation represents a procedural non-conformity with potential implications for traceability and qual

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
A comprehensive review of all painting application reports related to the subject line shall be performed. This review will focus on verifying that the coating cycles were applied in accordance with the approved procedure and that the inspections required at each step of the Inspection and Test Plan (ITP) were properly executed and documented. Provided that the documentation confirms full compliance with project specifications and inspection requirements, no further action will be taken. The closure of this Non-Conformity Report will constitute formal acceptance of the verification performed.	Degli Esposti Raffaele	31/03/2025	27/05/2025	The delay in the closure of this action is due to the temporary suspension of the QUANTUM non-conformity management database, following a full upgrade of the company's SAP system.

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	25/03/2025
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	25/03/2025

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2025-Q-123A90-0005 rev. 0

Client's / AI Approval:		**Role:**		**Date:**	
COMPLETION					
Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	14/04/2025
Effective Closing Date:					
Client's / AI Approval:		**Role:**		**Date:**	
Notes:					
Distribution:					

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2026-Q-123A90-0001 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** MF TRASORMATORI

Process:	SUPPLY
Activity:	FINAL DOSSIER PREPARATION
Short Title:	Lack of Required Material Certificates Traceability for Transformer Main Components

Procedure: 123A90-PML-QHSE-PRO-00113
1723001697-QC-DB-00004
1723001697-QC-LIS-00003

Description:

During the review of the Vendor Final Dossier and related correspondence, it was identified that the material certificates required by the approved Inspection and Test Plan (ITP), Section 2.5 – Material Certification, have not been provided.
The ITP explicitly requires the provision of material certificates for the following items:

- HV Conductors
- LV Conductors
- Tank & Cover
- Radiators
- Insulating Materials

The Vendor, MF Trasformatori, has stated that the above material certification is included within Section 2.5.2 – Declaration of Conformity.
This approach is not compliant with the ITP requirements.
A Declaration of Conformity is a manufacturer's statement confirming compliance of the finished product with applicable requirements and does not constitute a material certificate, nor does it provide the required level of material traceability (e.g. chemical composition, mechanical properties, heat/batch identification).
Furthermore, the Vendor clarified that, in their view, the "Declaration of Conformity" is a generic category encompassing material certificates, test certificates, and other documents.
This interpretation is not aligned with the contractual documentation, the approved ITP, nor with standard industry definitions of material certification.
As a result, the expected and offered material traceability level has not been demonstrated, and the material certification requirements of Section 2.5 of the ITP remain unfulfilled.

Noted by:	Zanellati Filippo	**Role:**		**Date:**	29/01/2026
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	02/02/2026

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: MISSING OR UNAVAILABLE DOCUMENTATION, RECORDS, REPORTS, CERTIFICATES

Notes:

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
Refer to the attachment	Degli Esposti Raffaele	02/02/2026	02/02/2026	

Defined by:	Degli Esposti Raffaele	**Role:**		**Date:**	02/02/2026
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	02/02/2026
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	02/02/2026

Effective Closing Date: 02/02/2026

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2026-Q-123A90-0001 rev. 0

Client's / AI Approval:	Role:	Date:

Notes:

Refer to the attachment.

Distribution:

ROSETTI MARINO	NON CONFORMITY REPORT	NCR n° 2026-Q-123A90-0002 rev. 0

DESCRIPTION

Project: 123A90	**Client:** CROSSWIND C.V.	**Originator:** VENDOR	**Subcontractor name:** REYNARD

Process: SUPPLY MANAGEMENT	**Procedure:** 123A90-PML-QHSE-PRO-00113 / VENDOR FINAL DOCUMENT REQUIREMENTS & MANAGEMENT
Activity: DOCUMENT CONTROL	
Short Title: MRB NOT IN COMPLIANCE TO PROJECT PROCEDURE	

Description:

For the purchase order 1724002000, the dossier provided by REYNARD is incomplete and not compliant with the applicable project procedure.

The documentation submitted consists of unstructured documents and reports, lacking proper organization as well as several required records and key information. As a result, the dossier does not meet the project requirements in terms of completeness, traceability, and formal structure.

Noted by:	Zanellati Filippo	**Role:**	QCI	**Date:**	15/04/2026
Accepted by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	15/04/2026

MANAGEMENT

☒ **Use as is** ☐ **Rework** ☐ **Rejected**

Root-Cause Analysis

Classification: MISSING OR UNAVAILABLE DOCUMENTATION, RECORDS, REPORTS, CERTIFICATES

Notes:

In order to mitigate the above deviation, Rosetti has reviewed the available documentation and compiled a dossier, organizing the received records as far as possible in line with the project procedure.
In addition, it is acknowledged that the supplied equipment (medium/high voltage cables) has been successfully tested at the manufacturer's premises, installed, mechanically completed, and commissioned within the relevant system, with satisfactory results.
Based on these objective evidences, the supply is considered fit for purpose and the associated technical risk is deemed to be low. No impact on safety or functionality has been identified.
Despite repeated follow-up actions towards REYNARD, the missing documentation has not been provided. Therefore, the dossier is accepted "as is" for project purposes. This NCR is raised to formally record the deviation from the applicable requirements and ensure traceability of the identified gaps.

Reaction Plan

Activities	Person in charge	Scheduled Closing Date	Actual Closing Date	Notes
REFER TO THE NOTES ABOVE	Degli Esposti Raffaele	15/04/2026	15/04/2026	

Defined by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	15/04/2026
Approved by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	15/04/2026
Client's / AI Approval:		**Role:**		**Date:**	

COMPLETION

Checked by:	Degli Esposti Raffaele	**Role:**	PQM	**Date:**	15/04/2026
Effective Closing Date:	15/04/2026				
Client's / AI Approval:		**Role:**		**Date:**	15/04/2026

Notes:

Preventive Action / Lessons Learned
In the event of future purchase orders to REYNARD, a preliminary audit of REYNARD's Quality Management System shall be performed prior to purchase order award.

The purpose of this audit shall be to verify REYNARD’s capability to adequately manage project documentation and final dossier compilation in accordance with contractual and project-specific requirements. Particular attention shall be given to document control processes, traceability of quality records, completeness of manufacturing and testing documentation, internal dossier compilation practices, and overall effectiveness of document management within the Quality Management System.

The outcome of such audit shall be used to assess REYNARD’s suitability to meet project documentation requirements and, where necessary, to define specific corrective actions and contractual provisions prior to order placement.

Distribution:

3 SUPPLY NON-CONFORMITY LIST AND REPORTS

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Supply Non Conformity

Job	Client	NCR Num.	Revision	PO Number	Supplier	Detection	Noted by	Managed by	Received At	Status	Remarks
123A90	CROSSWIND	2023-S-123A90-0001	0	1723001716	EUROPE STEEL PROJECTS BV (0000207487)	at Material Delivery	Spazzoli Enrico	Perrino Sara	EXTERNAL SITE	Closed	
123A90	CROSSWIND	2024-S-123A90-0001	0	1724001133	FEMI-CZ SPA (0000201077)	at Material Delivery	Rota Vittorio	Monti Claudio	PIOMBONI YARD	Closed	

ROSETTI MARINO	SUPPLY NON CONFORMITY REPORT	NCR n° 2023-S-123A90-0001 rev. 1

DESCRIPTION

Purchase Order: 1723001716 **Supplier:** EUROPE STEEL PROJECTS BV

Project: 123A90 **Client:** CROSSWIND C.V.

Supply Arrival Date: 08/11/2023 **Received at:** EXTERNAL SITE **Shipping Notice:** CMR TRUCK 1

ITP Doc. n°: N/A **ITP Step:** N/A

PO row	Description
90	At the Scandiuzzi workshop, a deformed sheet metal has been received. Identification: batch 827475 - plate 193480/2.

Noted by: Spazzoli Enrico **Role:** AM **Date:** 09/11/2023

Accepted by: Perrino Sara **Role:** EXP **Date:** 09/11/2023

MANAGEMENT

PO row	Description	Treatment	Actual Closing Date	Notes
90	At the Scandiuzzi workshop, a deformed sheet metal has been received. Identification: batch 827475 - plate 193480/2.	USE AS IT IS	11/01/2024	The plate can be used for other purposes. The plate has been replaced by another supplied by EUROPESTEEL with the same mechanical and chemical characteristics.

Person in charge: Degli Esposti Raffaele **Role:** PQM **Date:** 11/01/2024

Planned Closing Date: 11/01/2024 **Notes:**

COMPLETION

Checked by: Degli Esposti Raffaele **Role:** PQM **Date:** 11/01/2024

Effective Closing Date: 11/01/2024

Notes:

Distribution:

ROSETTI MARINO	SUPPLY NON CONFORMITY REPORT	NCR n° 2024-S-123A90-0001 rev. 0

DESCRIPTION

Purchase Order: 1724001133 **Supplier:** FEMI-CZ SPA

Project: 123A90 **Client:** CROSSWIND C.V.

Supply Arrival Date: 19/07/2024 **Received at:** PIOMBONI YARD **Shipping Notice:** DDT24006791/CZ

ITP Doc. n°: N/A **ITP Step:** N/A

PO row	Description
1000	The vert inged joints are with 8 bolts M6x12 H.155 instead of 9 bolts M8x17 H. 133
10	The thickness of tray/ladder covers is 1 mm instead of 1,5

Noted by: Rota Vittorio **Role:** AM **Date:** 22/07/2024

Accepted by: Monti Claudio **Role:** EXP **Date:** 25/07/2024

MANAGEMENT

PO row	Description	Treatment	Actual Closing Date	Notes
1000	The vert inged joints are with 8 bolts M6x12 H.155 instead of 9 bolts M8x17 H. 133	USE AS IT IS	25/07/2024	
10	The thickness of tray/ladder covers is 1 mm instead of 1,5	CHANGE MATERIAL	07/08/2025	

Person in charge: Monti Claudio **Role:** EXP **Date:** 31/07/2024

Planned Closing Date: 31/07/2024 **Notes:**

COMPLETION

Checked by: Degli Esposti Raffaele **Role:** PQM **Date:** 07/08/2025

Effective Closing Date: 07/08/2025

Notes:

Distribution: