



# Office of Environment, Health, Safety and Security

## Operating Experience Level 3

OE-3: 2026-01

July 2026

### Clarification for Reporting of Ratchet Straps

#### PURPOSE

The purpose of this Operating Experience Level 3 (OE-3) document is to provide guidance for Department of Energy (DOE) sites on evaluating and reporting ratchet strap assemblies that lack manufacturer markings.

#### BACKGROUND

Historically, ratchet straps featuring a high-strength bolt lacking a manufacturer's mark have been reported to the DOE Office of Inspector General (OIG) as Suspect/Counterfeit Items (S/CIs). However, based on current manufacturing practices, the absence of a manufacturer's mark on an installed bolt within a ratchet strap assembly is not sufficient on its own to warrant a final determination that the assembly is an S/CI.

Under legacy guidelines, fasteners with a minimum tensile strength of 120,000 psi (120 ksi / 827 MPa) are classified as "suspect" if they lack required manufacturer markings. This broad criterion stems from a headmark list first issued by the U.S. Department of Commerce in 1992. Over time, applying this outdated list to pre-installed bolts—combined with conflicting guidance in the Suspect/Counterfeit Items Resource Handbook (DOE-HDBK-1221-2024)—has placed an undue administrative burden on the OIG, reporting organizations, and manufacturers alike.

To address this issue, DOE plans to update DOE-HDBK-1221-2024. In the interim, this OE-3 provides clarified reporting guidance for Departmental Elements, though site implementation remains governed by applicable DOE orders, contracts, and approved local procedures.

Furthermore, ratchet straps do not meet the criteria for investigation under the Fastener Quality Act (FQA), which explicitly excludes fasteners pre-installed in assemblies. While the FQA does not directly apply to assemblies DOE sites must still evaluate ratchet strap assemblies for adequacy, authenticity, safety, and other S/CI indicators under established quality assurance processes. The OIG typically declines to investigate these issues unless additional indicators of fraud, counterfeiting, or significant material losses to the Department are present.

S/CIs must be controlled, evaluated, and reported in accordance with site processes implementing DOE O 414.1E, Quality Assurance, and other applicable reporting directives, including DOE O 221.1B, Reporting Waste, Fraud, and Abuse to the DOE Office of Inspector General.



*Ratchet strap with 8.8 marking and no manufacturer marking*

## OPERATIONAL HISTORY & CURRENT STATUS

The DOE OIG and the DOE Office of Environment, Health, Safety, & Security (EH) reviewed past reporting practices and identified the following:

- 1) Fasteners in assemblies like ratchet straps are excluded from automatic determination as counterfeit or fraudulent under laws such as the Fastener Quality Act (FQA) but the assembly still requires evaluation for adequacy, safety, authenticity, and other S/CI indicators using applicable site processes.
- 2) Of all the reported events involving S/CIs in ratchet strap assemblies, none of the cases warranted further investigation by the DOE OIG.

## KEY ISSUES

- **Over-reporting:** The previous guidance led to numerous reports based solely on the absence of a manufacturer's mark on a high-strength bolt, regardless of other indicators.
- **Resource Strain:** This volume of reporting created an unnecessary burden on OIG resources and those of reporting facilities.
- **Focus on Assembly, Not Just Component:** While a missing manufacturer's mark on a high-strength bolt may prompt review under legacy guidance, evaluations should focus primarily on the overall ratchet strap assembly and whether additional indicators of counterfeit, fraud, misrepresentation, labeling deficiencies, or adequacy concerns are present. Because current manufacturing practices routinely produce genuine, high-quality assemblies with unmarked bolts, this OE-3 clarifies that the missing manufacturer's mark alone is not sufficient to require a final determination that the assembly is S/CI.

## RECOMMENDATIONS

To optimize reporting efficiency and focus resources on the most critical concerns, sites are advised to:

1. Use internal nonconformance and technical evaluation processes to assess ratchet strap

assemblies with installed bolts that lack manufacturer markings. Document the condition and evaluate the assembly for adequacy, safety, authenticity, and other S/CI indicators. The absence of a manufacturer's mark alone does not require a final determination of S/CI or a formal referral to the DOE OIG.

2. Report ratchet straps to the DOE OIG, and process them through applicable site reporting channels, if they meet at least one of the following criteria:
  - a. **S/CI Indicators:** Exhibits Suspect/Counterfeit Item indicators beyond just a missing manufacturer's mark on the bolt (e.g., missing critical information such as load limits, manufacturer information on label, color coding in strap, etc.).
  - b. **Safety Concerns:** Poses a significant safety risk. Items appear like they could fail (e.g., visible irregularities on items other than those from normal use or storage).
  - c. **Financial Loss:** Failure that results or is likely to result in losses exceeding \$10,000, identified through internal trends (e.g., nonconformances, procurement records, etc.).

These recommendations are specifically limited to ratchet strap assemblies and do not alter general S/CI screening expectations for other high-strength fasteners, standalone fasteners, or separate assemblies with missing manufacturer markings.

This revised approach ensures that all potential issues are tracked internally and evaluated through normal site processes, while reserving formal reporting when warranted by the final evaluation and applicable reporting criteria.

## AGENCY POSITION

If a ratchet strap assembly is ultimately determined to be an S/CI, sites should process the item in accordance with applicable site S/CI procedures and DOE reporting requirements, including coordination with DOE OIG before destruction or disposal when required.

The DOE OIG and EH agree that an updated and risk-based approach to reporting ratchet straps is necessary.

The recommendations in this OE-3 are intended to support efficient program implementation and improved risk management.

#### REFERENCES

- DOE O 210.2A, *DOE Corporate Operating Experience Program*
- DOE O 221.1B, *Reporting Waste, Fraud, and Abuse to the Office of Inspector General*
- DOE O 232.2A, *Occurrence Reporting and Processing of Operations Information*
- DOE O 414.1E, *Quality Assurance*
- DOE-HDBK-1221-2024, *Suspect/Counterfeit Items Resource Handbook*
- 15 U.S.C 80 *Fasteners* § 5407 - *Manufacturers' insignias (Fastener Quality Act)*

This OE-3 document requires no follow-up report or written response.



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#### FOR MORE INFORMATION

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#### Operating Experience Level 3 (OE-3) Document

**Operating Experience Level 3 (OE-3) Documents** are operating experience-based articles published by the Office of Environment, Health, Safety, and Security (EH) and distributed across the DOE complex through the DOE Corporate Operating Experience Program to **highlight important issues with recommendations for follow-up**. OE-3s inform senior headquarters and field management when an operational trend or event warrants attention and potential action.