

Ownership matrix	<b>RPP-27195</b>
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## **1.0 PURPOSE AND SCOPE**

(7.1.1, 7.1.2, 7.1.3, 7.1.4)

This process consists of initiation, development, and approval of equivalent replacement documents. An equivalent replacement allows the substitution of an item that is equivalent but is not identical to the original item. An equivalent replacement shall meet the same design requirements, perform the same function, and have the same interface requirements as the item being replaced. By imposing these requirements, an equivalent replacement ensures the existing design function is not changed.

This procedure applies to safety significant or safety class equipment replacements.

This procedure doesn't apply to equipment being replaced in accordance with design baseline changes or general service component replacements (reference TFC-ENG-DESIGN-C-06).

This procedure applies to all Tank Operations Contractor (TOC) engineering organizations involved in controlling the design and maintaining the equipment associated with the tank farm facilities. If the item must be upgraded from commercial grade for use in a safety significant or safety class application, the upgrade of the equivalent item is performed in accordance with the requirements specified in TFC-ENG-DESIGN-C-15.

## **2.0 IMPLEMENTATION**

This procedure is effective on the date shown in the header. Equivalent replacement documents that have been prepared or are in process may continue according to the previous revision. Refer to TFC-ENG-DESIGN-C-25 for other implementation considerations such as document numbers, reviews, approvals, and document release.

## **3.0 RESPONSIBILITIES**

Responsibilities are contained within Section 4.0.

## **4.0 PROCEDURE**

### **4.1 General**

1. An equivalent replacement may be required whenever one or more of the following occur:
  - Obsolescence of the item
  - Reliability of the item is questionable due to in-service failure records or industry/regulatory notices
  - A different part number change is initiated by the manufacturer
  - A material change is made in the item by the manufacturer
  - A design/function/performance change is made in the item by the manufacturer
  - A substitution is made for the item by the manufacturer

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- The manufacturer is no longer in business but a similar item is made by a different manufacturer
  - The original manufacturer is now owned by another company
  - A replacement cost or change in schedule.
2. Any document pertinent to the equivalent replacement, or prepared as a result of the equivalent replacement process, shall be listed in the Equivalent Replacement (ER) form (A-6003-188) as an associated document. These documents shall be attached to the ER as attachments if they are not controlled documents in IDMS.
  3. See Figure 1 for process flow.

#### 4.2 Equivalent Replacement Preparation and Approval

- Originating Engineer
1. Determine if an equivalent replacement is needed based on one or more of the conditions of Section 4.1.1.
  2. If an equivalent replacement is needed, initiate an ER Form (A-6003-188); obtained from the Hanford Site Forms website.
    - a. Obtain an ER Form document tracking number from SmartPlant® Foundation (SPF), and fill it in on the first page. The number will have the following format:
      - RPP-ER- XXXXX Revision-Z, XXXXX is the sequential number assigned from the database, and Z is the revision number (the original ER document will be revision 0).
    - b. On the remaining ER Form pages and any supporting documentation that is attached, fill in the ER form number and revision number that was identified on the first page.
  3. Fill in the appropriate information in SPF, which gets transferred into the document release control form DRCF which, includes the approvers, distribution list, and other required information.
  4. In the ER Form (Section 2), document the information for the original item, including manufacturer and/or supplier, and manufacturer and/or supplier item number, specification, item description and all other applicable blocks in the Section.
  5. Determine the application, safety classification, and function of the item; document the item in the appropriate blocks of the ER form (Section 4) and the reason for needing a replacement item.
    - The application description provides the originator the opportunity to identify multiple locations/uses of the same item.

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- This allows approval of the replacement item for use in several locations as long as the critical characteristics and qualification requirements are the same.
  - This can make the equivalent replacement document applicable to multiple locations, eliminating the need to repeat the equivalent replacement process for those locations in the future.
6. If the safety classification of the item is not already documented, determine the safety classification in accordance with the requirements specified in TFC-ENG-DESIGN-C-45 or TFC-ENG-DESIGN-P-43, as appropriate.

NOTE: Critical characteristics for equivalency are to be functional in nature. The critical characteristics are the required characteristics for the item, which may be less restrictive than the actual characteristics of the original item.

7. Determine the Critical Characteristics of the item and list them in the ER form (Section 5), using Attachments A and B as aids in identifying critical characteristics.
8. Determine if an equivalent replacement document has already been generated for the same original item and whether it applies to the current need.
- a. If there is not an existing equivalent replacement document for the same original item, proceed with Section 4.2, Step 10.
  - b. If there is an existing equivalent replacement document, review to determine if it can be used for this application.
9. At a minimum, ensure the review confirms that the existing equivalent replacement document item is for the same Item Application, Safety Classification, and Safety Function (ER form, Section 4) and has equivalent Critical Characteristics (ER form, Section 5).
- a. If the existing equivalent replacement document applies (i.e., addresses the identical original item and application), exit this procedure, process an engineering change notice (ECN), if necessary, to change additional documentation, and proceed with procurement of the approved item.
  - b. If the existing equivalent replacement document is applicable, but does not completely bound the new need (e.g., the current application or installation differs from the condition evaluated by the existing equivalent replacement document), proceed with Step 10 using the existing equivalent replacement document as a resource, where possible.

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10. Determine if there is a candidate replacement item available.
  - a. If no candidate replacement items are identified, exit this procedure and initiate an ECN in accordance with TFC-ENG-DESIGN-C-06 for any drawing changes required.
  - b. Initiate a Document Release and Change Form (DRCF) for changes to other documents in accordance with TFC-ENG-DESIGN-C-25.
11. If a candidate replacement item was identified in Step 8 or 9, continue with the equivalent replacement process, and document the following on the ER form (Section 3) to approve the replacement item:
  - a. Document the technical information for the candidate replacement item, including manufacturer/supplier name(s), and manufacturer/supplier item numbers and the other applicable items on the ER form (Section 3).
  - b. Perform an equivalency evaluation of the candidate item.
  - c. List the critical characteristics of the original items and the candidate replacement item in Section 5 of the ER form and document how the potential replacement item's characteristics satisfy the critical characteristics of the original item.
    - 1) Document the changes in design, material, manufacturing process, configuration, form fit, or function, of the replacement items that is different from the original item.
    - 2) In the right-hand column of Section 5, evaluate the changes and confirm the changes do not affect the current design or safety function.

NOTE: Seismic/Environmental qualification testing requirements that are needed should be specifically documented in this section as well. Unless the item is a like for like replacement, this testing is needed to ensure the item is qualified for the design application. Qualification of the replacement item may occur prior to procurement so the testing can be documented here and in the "document results" section, specify the details of the testing and qualification and the results.

- d. If testing is required to verify if any of the critical characteristics are met, acquire and test the candidate item; document the required testing, acceptance criteria, and the test results in Section 6 of the ER form.

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NOTE: The only type of testing to be identified in Section 6 of the ER form is special testing needed to verify a critical characteristic is met, when that characteristic cannot be verified by any other means. *This section should not identify any standard, functional testing that would always be performed to verify proper system/component function following maintenance (e.g., even after maintenance to repair or replace the original part). Such testing would be required by the work package, but it is not required specifically because the equivalency process is being used.*

12. If possible, provide technical justification for any differences between the critical characteristics of the original item and the actual characteristics of the candidate replacement item.
  - a. If justification is not possible or differences desired, that item is not equivalent and cannot be used; repeat Step 10 and 11 until an acceptable replacement item has been found or until all candidate replacement items have been eliminated.
  
13. If an acceptable equivalent item can NOT be found, initiate a design change to allow the installation of new equipment.
  - a. Discontinue the equivalent replacement process and initiate an ECN in accordance with TFC-ENG-DESIGN-C-06 for any drawing changes required.
  - b. Initiate a DRCF for changes to other documents in accordance with TFC-ENG-DESIGN-C-25.
  
14. When an equivalency evaluation is successfully completed for a replacement item:
  - a. If the item is commercial grade and will be used in a safety significant or safety class application, perform commercial grade dedication (CGD) in accordance with TFC-ENG-DESIGN-C-15.
  - b. Check the field location for installation/mounting compatibility.
  - c. Provide in Section 7 of the ER form any appropriate installation guidance or special instructions (e.g., minor rerouting of tubing or wiring, etc.) to support work planning for the installation of the new item.

NOTE: As long as the new item has the same interface requirements (e.g., same air pressure or voltage/current), it is acceptable to allow minor differences in the orientation of the interface points (e.g., air or electrical connection locations).

- d. For changes to any drawings that identify the item that is being replaced, prepare an ECN in accordance with TFC-ENG-DESIGN-C-06

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- e. Initiate a DRCF for revision to any other documents that identify the item that is being replaced in accordance with TFC-ENG-DESIGN-C-25. As applicable, the change should indicate that either the original item or the equivalent replacement item can be used in this location/application.
- f. Prepare a change to the safety equipment list and/or the master equipment list to show the approved replacement part, in accordance with the requirements specified in TFC-ENG-FAC SUP-C-23.
- g. Complete preparation of the equivalent replacement document.
  - 1) List references in Section 8 of the ER form.
  - 2) List the attachments/supporting documents for the equivalent replacement document in Section 9 of the ER form.
  - 3) Attach any supporting documentation (e.g., continuation pages, determination of safety classification), and apply the equivalent replacement document number to all included documentation.

Engineering Manager

- 15. Assign a primary reviewer.

Originating Engineer

- 16. Identify the affected organizations, which are required to review portions of the equivalent replacement document that directly affect their organization or area of expertise.
  - a. Determine the required independent reviewers in accordance with TFC-ENG-DESIGN-C-52.
  - b. List the approval designators for the required review organizations in the “Approvals” block, Section 1, on the ER form.
- 17. Provide the equivalent replacement document package to the reviewers.
  - a. Load the form into SPF, and fill out the appropriate sections in SPF.
    - 1) Attach a workflow to the ER to begin routing it for approvals.

NOTE: The primary reviewer must perform a complete review of the entire equivalent replacement document.

Primary Reviewer

- 18. Review the equivalent replacement document and the ECNs/DRCFs for completeness, technical accuracy, and procedural compliance, resolving

any concerns with the engineer who developed the equivalent replacement document.

- |                     |  |
|---------------------|--|
|                     | 19. Verify the resolution is within the scope of the equivalent replacement process.   |
|                     | 20. When satisfied the equivalent replacement document and ECNs/DRCFs are complete and acceptable, Print, Sign, and Date under the release stamp on the first page and return the equivalent replacement and other applicable documents to the originating engineer. |
| Other Reviewers     | 21. Review the portions of the equivalent replacement document, which affect their organization, or area of expertise for completeness, technical accuracy, and adequate justification.  |
|                     | 22. Resolve any comments with the originating engineer, using SPF.   |
|                     | 23. Sign the equivalent replacement document in SPF.   |
| Engineering Manager | 24. When satisfied the equivalent replacement document and ECNs/DRCFs are complete and acceptable, and the appropriate approval designators were identified, sign the equivalent replacement document in SPF.  |

### 4.3 Equivalent Replacement Document Revisions

It may become necessary to change an equivalent replacement document after it has been issued (e.g., to include a change to an affected document that was identified after the original equivalent replacement document was released). This section provides guidance for processing a revision.

- |                      |   |
|----------------------|---|
| Originating Engineer | 1. Fill out a new ER form.  |
|                      | a. Duplicate the information from the original form for the item being replaced.  |
|                      | b. Fill in the information for the replacement item.  |
|                      | c. In the reason for “Needing Replacement Part” block of Section 4, include an explanation of the need for this revision.                                 |
|                      | d. Complete the rest of the form, indicating the information that is being changed in this revision.  |
|                      | e. On each page, enter the same number that was assigned to the original equivalent replacement document, but assign the next sequential revision number. |
|                      | f. Process the equivalent replacement document revision for review and approval in accordance with Section 4.2, Steps 10 through 26.                      |

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2. Identify the required distribution in Section 1 of the ER form, and submit the revised equivalent replacement document for release and distribution in accordance with TFC-ENG-DESIGN-C-25.

#### 4.4 Equivalent Replacement of Items Not Intended for Immediate Installation

##### 4.4.1 Linking and Tagging Equipment to Replacement Items

Some replacements are not required to be installed right away. For example, spare parts orders can be purchased as replacements for existing items which may have had changes made that require an equivalency evaluation. These replacements may be evaluated for equivalency, dedicated using the CGD process, and upgraded for use as a basic component. However, the original item may be used long before the replacement is needed and therefore the associated drawings and configuration control documents may not be updated right away with the replacement item's new information until it is installed. In order to ensure that replacement items that will be held for long periods of time (greater than one year) have the appropriate configuration control maintained in their design documents, the following steps shall be taken:

- |                      |   |
|----------------------|---|
| Originating Engineer | <ol style="list-style-type: none"> <li>1. In SPF, add a note to the equipment identification number (EIN) in the "Additional Information" section of the EIN detailing the procurement information of the replacement item.</li> <li>2. Identify the equivalent replacement and CGD number associated with the replacement.</li> <li>3. List the documents that will need to be updated with the replacement item.</li> </ol> |
|----------------------|---|

NOTE: The conditional statement to be written on the tag that allows it to be removed will include any drawings, functions and requirements evaluation documents (FREDs), safety requirement evaluation documents (SREDs), or other documents that will require updating prior to the installation of the item.

- |  |   |
|--|---|
| Procurement Engineer/Quality Assurance | <ol style="list-style-type: none"> <li>4. After the CGD has received its final approvals but prior to the green tagging of the item, create a Conditional Accept tag that identifies the CGD number, PO number, CID, pertinent drawings, and other relevant information.</li> </ol> |
| Procurement Engineer                   | <ol style="list-style-type: none"> <li>5. Place an RPP-Hold on the CGD in SPF per TFC-ENG-DESIGN-C-25.</li> </ol>   |

##### 4.4.2 Preparing Replacement Items for Installation

The steps in Section 4.4.1 provide a way to link the replacement item to its equivalent replacement and digitally and physically tag it to ensure that before it is used that its associated documentation is updated. After the period of time, the replacement item will need to be used and the following steps performed:

- |                      |  |
|----------------------|--|
| Originating Engineer | <ol style="list-style-type: none"> <li>1. Revise the associated drawings, ECN, FRED, SRED, etc. with the new replacement item's information in accordance with TFC-ENG-DESIGN-C-06.</li> </ol> |
|----------------------|--|

- |                              |    |   |
|------------------------------|----|---|
|                              | 2. | Remove the note from the “Additional Information” section of the EIN.   |
| Procurement Engineer         | 3. | Revise the dedication package to remove the RPP-HOLD and green tag the item.<br><br>Initiate a revision to the CGD and attach the original closed out CGD to the new package as an attachment.<br><br>Obtain the initial and final release signatures to the revised CGD. |
| Quality Assurance Technician |    | Once the signatures have been obtained and all conditions have been met, remove the conditional accept tag, and apply a green tag to the item and signoff on the CGD.   |
| Procurement Engineer         |    | Release the CGD in SPF.   |

## 5.0 DEFINITIONS

Critical characteristics. Important design, material, and performance characteristics of a commercial grade item or service that, once verified, will provide reasonable assurance that the item or service will perform its intended safety function.

Equivalent replacement. An item that is equivalent but is not identical to the original item. The item may have different form, fit, or certain design characteristics, but, as a minimum, meets the same design basis requirements and performs the same function as the item being replaced. The replacement item also meets all applicable interface requirements of the original item.

Form. Those characteristics of an item that define the physical envelope (e.g., type or style of item, weight, material composition, and shape), design ratings, quality requirements, and code applicability associated with an item.

Function. The operation an item is required to perform to meet the component or system design basis, including passive operations, such as pressure containment.

Primary reviewer. The reviewer assigned to perform a complete review on the entire equivalent replacement document.

Engineering manager. The individual defined per the Engineering Management Plan (TFC-PLN-03) (e.g., system engineering manager, engineering technical manager).

Responsible Engineering Organization. The individual who generates the Equivalent Replacement form as per the Equivalent Replacement procedure. This is generally an engineer, (typically the Design Authority, procurement engineer, a delegated system engineer, a delegated project engineer, etc.) but can be other appropriate individuals as well for non-safety related equipment replacements.

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## 6.0 RECORDS

The following records are generated during the performance of the procedure:

- Equivalent Replacement Form (A-6003-188)
- Engineering Change Notice, if generated
- Document Release and Change Form, if generated.

The record custodian identified in the Company Level Records Inventory and Disposition Schedule (RIDS) is responsible for record retention in accordance with TFC-BSM-IRM\_DC-C-02.

## 7.0 SOURCES

### 7.1 Requirements

- 7.1.1 DOE O 433.1b, "Maintenance Management Program for DOE Nuclear Facilities."
- 7.1.2 DOE-STD-1073-2016, "Guide for Operational Configuration Management Program," Part 1, and Guide for Operational Configuration Management Program, Part 2.
- 7.1.3 TFC-PLN-02, "Quality Assurance Program Description."
- 7.1.4 TFC-PLN-41 "Integrated Safety Management System Description."

### 7.2 References

- 7.2.1 TFC-BSM-IRM\_DC-C-02, "Records Management."
- 7.2.2 TFC-ENG-DESIGN-C-06, "Engineering Change Control."
- 7.2.3 TFC-ENG-DESIGN-C-15, "Commercial Grade Dedication."
- 7.2.4 TFC-ENG-DESIGN-C-25, "Technical Document Control."
- 7.2.5 TFC-ENG-DESIGN-C-45, "Control Development Process for Safety-Significant Structures, Systems, and Components."
- 7.2.6 TFC-ENG-DESIGN-C-52, "Technical Reviews."
- 7.2.7 TFC-ENG-DESIGN-P-43, "Control Development Process for Safety-Significant Safety Instrumented Systems."
- 7.2.8 TFC-PLN-03, "Engineering Program Management Plan."

Figure 1. Equivalent Replacement Process.

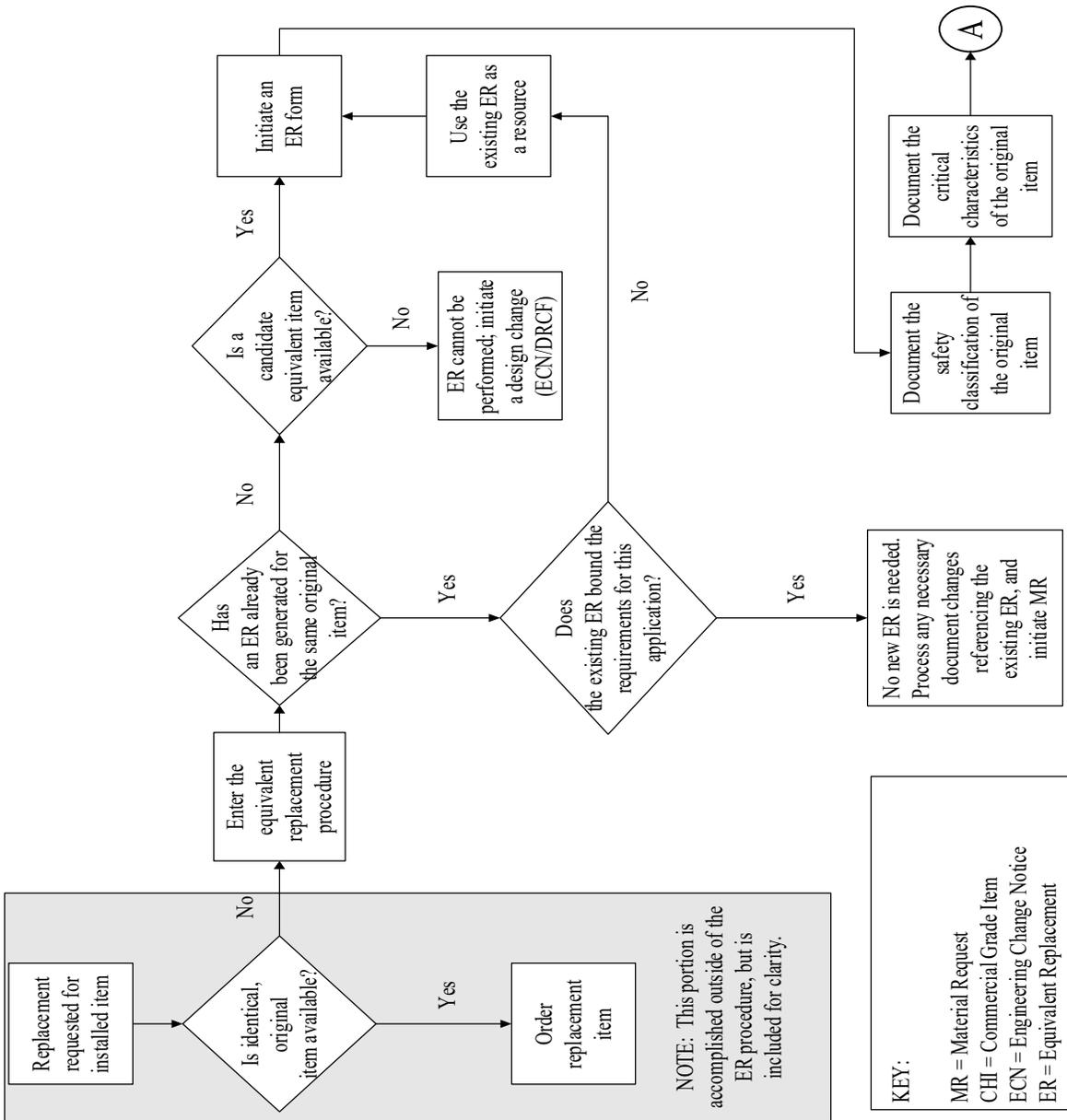
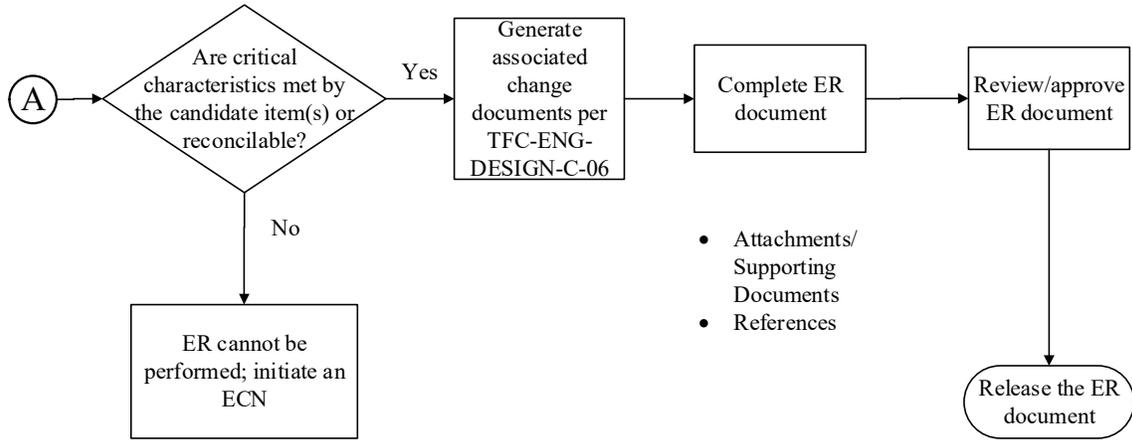


Figure 1. Equivalent Replacement Process. (cont.)



**ATTACHMENT A – CRITICAL CHARACTERISTICS DETERMINATION AND EVALUATION**

Determine critical characteristics as follows:

NOTE: Attachment B may be used to assist in determining critical characteristics for an item.

1. Identify the characteristics that are important to the original item's design and function.
2. The selected characteristics should be based on the complexity, intended function, and performance of the item.
3. The engineer shall include the following, as a minimum, in the documentation of the critical characteristics evaluation:
  - a. The original item's bounding conditions for design and function.
  - b. The original item's failure modes and effects that were used in determining any characteristics.
  - c. The basis for the replacement item's compliance with the critical characteristics.

**ATTACHMENT B – EXAMPLES OF CRITICAL CHARACTERISTICS**

**General Listing of Typical Critical Characteristics**

**Product Identification:**

Color coding	Enclosure type	Nameplate data
Display type (scale, graduations)	Industry standard markings	Part number/unique identifier

**Physical Characteristics:**

Balance	Durometer hardness	Pour point
Capacitance	Elasticity	Purity
Cloud point	Fatigue resistance	Resilience
Coating	Flammability	Resistance
Color	Flashpoint	Solubility
Composite material hardness	General configuration/shape	Spring constant
Concentration	Homogeneity	Surface finish
Conductivity	Impedance	Surface hardness
Continuity	Inductance	Tensile strength
Density/Specific gravity	Leachable halogen content	Torque
Dielectric strength	Luminescence	Viscosity
Dimensions (to within manufacturer's tolerances)	Material of construction	Weight
Drop point	Plating	
Ductility	Polarity	

**ATTACHMENT B – EXAMPLES OF CRITICAL CHARACTERISTICS (cont.)**

**Performance Characteristics:**

Accuracy	Interrupt rating	Pressure drop
Burn-in endurance	Interrupting current	Pressure rating
Chatter	Leakage	Repeatability
Current rating	Load rating	Ride Out
Cycle time	Open/closure time	Rotation direction
Deadband width	Operability (fail open/close, stroke)	Set point stability
Flow rate	Operating range	Speed
Gain	Performance during (no drift) under voltage conditions	Time/current response
Horsepower	Pick-up/drop-out voltage	Voltage rating
Input/output voltage	Power rating	

**ATTACHMENT B – EXAMPLES OF CRITICAL CHARACTERISTICS (cont.)**

**Critical Characteristics for Generic Application Items**

NOTE: This list is provided for illustration by example and is not intended to be all-inclusive or to exclude characteristics that may be deemed important by the engineer.

<b><u>Item</u></b>	<b><u>Critical Characteristics</u></b>
Bearing	Configuration, dimensions, load rating, material, model number
Bolting	Configuration, dimensions, pitch, material, tensile strength, hardness, plating
O-Ring	Dimensions, material, durometer hardness, elongation, leachable halogens
Terminal Block	Configuration, voltage rating, current rating, materials, dielectric strength
Crimped Terminal Connector	Configuration, material, dimensions (wire size, ring tong size), voltage rating, continuity, tensile pullout strength, color
Relay	Configuration, pick-up/drop-out voltage, voltage rating, current rating, chatter, response time
Fuse	Configuration, current rating, interrupt rating, time/current response, and dimensions
Resistor	Configuration, markings, resistance, power rating
Drive Belt	Dimensions, cross-sectional shape, ride-out, fatigue resistance, load rating, material, and tensile strength
Spiral Wound Gasket	Configuration, dimensions, markings, style number, materials (filler and windings), pressure rating, leachable halogens, special density
Cotter Pin	Configuration (point type), dimensions, material, finish, hardness
Pressure Switch	Configuration, dimensions, material (pressure retaining parts), voltage rating, response time, accuracy, nameplate data, pressure range, wire rating, enclosure type, dielectric strength (insulation), dead band width
Temperature Switch	Configuration, dimensions, material, voltage rating, response time, accuracy, nameplate data, temperature range, wire rating, enclosure type, dielectric strength (insulation), dead band width

**ATTACHMENT B – EXAMPLES OF CRITICAL CHARACTERISTICS (cont.)**

Lubricating Grease/Oil                      Color, specific gravity, viscosity, drop point, cone penetration, pour point, chemical composition, cloud point

**Critical Characteristics for Generic Application Items**

<b><u>Item</u></b>	<b><u>Critical Characteristics</u></b>
Fuel Oil	Density, flash/cloud/pour points, kinematic viscosity, chemical composition, BTU rating
Framing Device	Configuration, shape, dimensions, material, tensile strength, coating
Materials (e.g., plate, angle)	Dimensions, shape, material, tensile strength, hardness, ductility, markings, coating
Valve Stem	Configuration, dimensions, material, tensile strength, ductility, finish, markings, hardness
Pump Impeller	Configuration, dimensions, material, hardness, balance, flow rate
Motor	Nameplate data (horsepower, speed, voltage), insulation class, frame size, materials, weight, shaft type, coupling type, bearing types, qualifications (seismic, environmental)
Nonmetallic Diaphragm (Valve Air Operator)	Configuration, dimensions, material, durometer hardness, reinforcement material, qualifications (seismic, environmental)
Solenoid Valve	Configuration, size, pressure rating, materials, voltage rating, current rating, coil class, open/ closure time, qualifications
Limit Switch	Configuration, dimensions, materials (metallic and nonmetallic), markings, operability, voltage rating, current rating, qualifications
Impeller Key	Configuration, dimensions, material, hardness
Spring (Relief Valve)	Configuration, dimensions (free length, coil diameter), spring rate, finish
Circuit Breaker	Nameplate date, dimensions, material, weight, accuracy, current rating, interrupt rating, interrupting current, open/close time, time current response, voltage rating, insulation resistance, voltage drop, qualification
Valve Packing Gland	Configuration, dimensions, material, tensile strength, hardness, finish
Filter Regulator Assembly (Pressure Control Valve)	Configuration, dimensions, materials, flow rate, pressure range, pressure rating, temperature rating, filter micron size

**ATTACHMENT B – EXAMPLES OF CRITICAL CHARACTERISTICS (cont.)**

**Critical Characteristics for Generic Application Items**

<b><u>Item</u></b>	<b><u>Critical Characteristics</u></b>
Pinion Gear	Configuration, dimensions, material, hardness, pitch
Crane Wheel Axle	Configuration, dimensions, material, tensile strength, hardness, finish
Shaft Coupling	Configuration, dimensions, materials, hardness
Anchor Bolt	Configuration, dimensions, material, wedge hardness, pitch, qualifications
Torque Switch	Configuration, dimensions, materials (metallic and nonmetallic), operability, qualifications
Pump Mechanical Seal Assembly	Configuration (completeness of assembly), materials, finish, leakage, leachable halogen content, dimensions
Valve Seal Ring	Configuration, material dimensions, finish, leakage
Integrated Circuit	Configuration, gain, input/output impedance, frequency responses, operability
Pressure Transmitter	Configuration, voltage rating, current output, pressure rating, materials, accuracy, qualifications
Control Switch	General configuration, contact configuration, voltage rating, current rating, materials, dimensions, operability
Transistor	Markings, gain, input/output impedance, current rating, voltage rating, operability