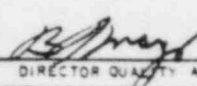


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|---|------------|--|--------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 | SECTION |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 9 | | |
| | | TABLE OF CONTENTS | DATE 9/24/84 |

R8

| | <u>Rev. No.</u> | <u>Date</u> |
|---|-----------------|-------------|
| <u>Introduction & Scope of Services</u> | 5 | 7/5/84 |

PART I - General

| <u>Section</u> | <u>Title</u> | <u>Rev. No.</u> | <u>Date</u> |
|----------------|---|-----------------|-------------|
| QA-I-1 | Quality Assurance Program | 6 | 7/5/84 |
| QA-I-2 | Organization and Responsibilities | 6 | 7/5/84 |
| QA-I-3 | Personnel Indoctrination and Training Program in Quality Assurance | 5 | 9/24/84 |
| QA-I-4 | Deleted (not applicable) | | |
| QA-I-5 | Deleted (not applicable) | | |
| QA-I-6 | Quality Assurance Records | 4 | 7/5/84 |

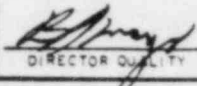
PART II - Engineering Offices

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PART III - Construction Site

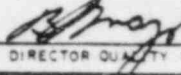
| <u>Section</u> | <u>Title</u> | <u>Rev. No.</u> | <u>Date</u> |
|----------------|--|-----------------|-------------|
| QA-III-1 | Instructions, Procedures, and Drawings | 4 | 7/5/84 |
| QA-III-2 | Document Control | 6 | 9/24/84 |
| QA-III-3 | Deleted (not applicable) | | |
| QA-III-4 | Deleted (not applicable) | | |
| QA-III-5 | Deleted (not applicable) | | |
| QA-III-6 | Nonconformances | 4 | 7/5/84 |
| QA-III-7 | Corrective Action | 4 | 7/5/84 |
| QA-III-8 | Control of Special Processes | 5 | 7/5/84 |

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|---|------------|---|--------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 TABLE OF CONTENTS | SECTION |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 9 | | DATE 9/24/84 |

PART III - Construction Site (Cont'd)

| <u>Section</u> | <u>Title</u> | <u>Rev. No.</u> | <u>Date</u> |
|----------------|--|-----------------|-------------|
| QA-III-9 | Quality Assurance Audits | 6 | 9/24/84 |
| QA-III-10 | Identification and Control of Items | 3 | 7/5/84 |
| QA-III-11 | Inspection | 5 | 7/5/84 |
| QA-III-12 | Test Control | 4 | 7/5/84 |
| QA-III-13 | Control of Measuring and Testing Equipment | 4 | 7/5/84 |
| QA-III-14 | Control of Receiving, Handling, and Storage | 5 | 7/5/84 |
| QA-III-15 | Inspection, Test, and Operating Status | 3 | 7/5/84 |
| Appendix I | Terms and Definitions | 3 | 7/5/84 |
| Appendix II | Ebasco Exceptions to US Nuclear Regulatory Guides and ANSI Standards Indicated in Section QA-I-1 | 4 | 7/5/84 |

| | | | |
|---|----------------------------|---|-------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 PERSONNEL INDOCTRINATION AND TRAINING PROGRAM IN QUALITY ASSURANCE | SECTION QA-I-3 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 5 DATE 9/24/84 | | |

R8

1.0 SCOPE

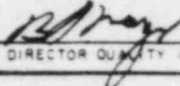
This Section describes the program for indoctrination and training of Ebasco personnel engaged in activities affecting quality with respect to the requirements of this Manual and its supporting principal implementing procedures. Ebasco personnel shall be indoctrinated and trained, as necessary, to assure that proficiency is achieved and maintained in those parts of the Quality Assurance Program as it applies to the individual's responsibility.

2.0 GENERAL

The Indoctrination and Training Program is a combined effort of the Ebasco organizations implementing any portion of this Manual and its principal implementing procedures, and the Quality Assurance organization. The Construction, Materials Applications, and Quality Assurance organizations are responsible to schedule, indoctrinate, and train their personnel, and to record this indoctrination and training, unless otherwise denoted by project commitments.

3.0 PROGRAM REQUIREMENTS

3.1 Preplanned written lessons shall contain the substance of the indoctrination and training program. These lessons shall address one or more quality-related topics, to achieve one or more stated educational objectives. The training will be conducted by trained supervisors or their designees within the Construction and Materials Applications organizations, and by a Quality Assurance Education Specialist or designee when the need arises. A Quality Assurance Education Specialist will be responsible for training the selected instructors within the other Ebasco organizations in methods of conducting required quality assurance training.

| | | | |
|---|----------------------------|---|-------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 PERSONNEL INDOCTRINATION AND TRAINING PROGRAM IN QUALITY ASSURANCE | SECTION QA-I-3 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 5 DATE 9/24/84 | | |

3.2 For Construction, Quality Assurance, and Materials Applications, preplanned training lessons are maintained by each organization respectively. The preplanned training lessons relate to activities the personnel shall be performing. For Construction and Materials Applications, a responsible person within the respective organization shall determine the training requirements for each individual based on that individual's assigned responsibilities and past experience. Within the Quality Assurance organization, a Quality Assurance Education Specialist shall be responsible for determination of an individual's training requirements based upon that individual's assigned responsibilities and past experience, as applicable. Preplanned training lessons are updated, when required, and reflect any changes in the program. Copies of these preplanned training lessons shall be kept on file by the respective organization. Quality-affected training will reflect project requirements.

4.0 RECORDS


Individual training files for personnel in the Construction, Quality Assurance, and Materials Applications organizations receiving indoctrination and training in accordance with this program's requirements shall be maintained by each affected organization. These records will indicate, as applicable, the subject matter, the training received, attendance date, time duration, instructor, and special qualifications or restrictions, if any.

5.0 SCHEDULING

Scheduling training of applicable organization personnel will be coordinated with a Quality Assurance Education Specialist where necessary. As new personnel are added to the South Texas Project within an organization, appropriate indoctrination and training sessions will be scheduled based on the requirements of this Manual.

6.0 PROGRAM UPDATING

This indoctrination and training program is subject to continuous development to broaden and improve its effectiveness. A Quality Assurance Education Specialist will hold periodic discussions with those groups involved with the training program to coordinate recommendations for updating. A Quality Assurance Education Specialist is responsible for updating the program for the Quality Assurance organization.

| | | | |
|---|----------------------------|---|-------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 PERSONNEL INDOCTRINATION AND TRAINING PROGRAM IN QUALITY ASSURANCE | SECTION QA-I-3 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 5 DATE 9/24/84 | | |

7.0 ADMINISTRATION

7.1 The Quality Assurance Engineering Quality Resources and Training Management Group shall have overall responsibility for administering the quality assurance training program. It shall provide technical expertise for developing necessary programs and review existing programs for currency.

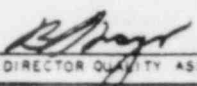
7.2 Management of each Ebasco organization is responsible to assure that the appropriate personnel attend the training program(s) for which they are scheduled.

8.0 TRAINING, QUALIFICATION, AND CERTIFICATION OF QUALITY CONTROL PERSONNEL

Training, qualification, and certification of Site Quality Control inspection personnel shall be in accordance with written procedures. The Quality Control Site Supervisor or his designee shall coordinate with a Quality Assurance Education Specialist regarding the training, qualification, and certification of Quality Control personnel. Qualification records for all Quality Control personnel assigned to the South Texas Project site shall be maintained by a Quality Assurance Education Specialist at the site. These records will be reviewed initially by the Manager Quality Assurance Engineering, or his designee, for compliance with the qualification requirements, and thereafter on an annual basis by auditors from the Site Quality Assurance organization. Any deficiencies detected shall be reported in writing by the Quality Assurance Site Supervisor, or his designee, to the Quality Control Site Supervisor for resolution. Pending resolution of the deficiency, the individual shall be restrained from performing any Quality Control activities.

9.0 AUDITS

Audits of indoctrination and training activities shall be performed to assure compliance with this Program. Such audits shall be performed in accordance with the requirements of Section QA-III-9 of this Manual.

| | | | |
|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 DOCUMENT CONTROL | SECTION QA-III-2 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

1.0 SCOPE

This Section of the Manual establishes the requirements for the control of all project documents used by Ebasco which have an effect on quality-related activities. These requirements apply to those documents such as specifications and drawings, as well as site instructions and site procedures, which control or direct activities affecting quality.

2.0 RESPONSIBILITIES

2.1 The corresponding Department Heads or their designees shall be responsible for furnishing the Client or his designee with the latest of all Ebasco site-generated field sketches, construction procedures, quality control procedures, and special process procedures.

2.2 The Client or his designee shall be responsible for the distribution and control of all construction site design documents, drawings, specifications, construction procedures, quality control procedures, and special process procedures.

2.3 The Quality Assurance Site Supervisor or his designee shall be responsible for the distribution and control of site-generated quality assurance procedures and instructions.

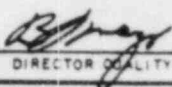
3.0 ISSUANCE OF CONTROLLED DOCUMENTS

3.1 Establishment of Document Control Stations

3.1.1 Document control stations shall be established and maintained by the Client or his designee.

3.1.2 Requests by Ebasco for the establishment of new or deletion of existing document control stations for the distribution of controlled documents shall be submitted by the corresponding Department Head, Unit Superintendents, or Project Superintendent to the Client or his designee.

3.1.3 Requests by Ebasco for additions or deletions of documents issued to an established document control station shall be submitted to the Client or his designee.

| | | | |
|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 DOCUMENT CONTROL | SECTION QA-III-2 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

3.2 Design Documents, Drawings, and Specifications

3.2.1 The Client or his designee shall furnish, distribute, and control all design documents, drawings, and specifications to the established document control stations in accordance with the Client's or his designee's written procedures.

3.2.2 Ebasco personnel shall use during their work activities the latest design documents, drawings, and specifications as provided by the Client or his designee at the appropriate document control stations, except that field change requests in an "Interim Approval" stage shall be controlled by the Senior Resident Engineer in accordance with approved site procedures.

3.3 Ebasco Intradepartmental/Discipline Instructions and Procedures

3.3.1 Intradepartmental/Discipline instructions and procedures shall be issued and controlled in accordance with Section QA-III-1 of this Manual.

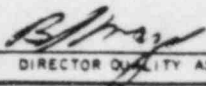
3.3.2 Quality Assurance procedures describing auditing responsibilities of Site Quality Assurance shall be distributed and controlled at the construction site in "book" form. A master file shall be maintained of all procedures and revisions. A master list shall be maintained indicating each person or organization to whom a book of procedures has been issued. New or revised procedures will be issued to each holder of a procedure "book." A receipt system shall be used which requires written acknowledgment of distributed procedures.

3.4 Ebasco Site-Generated Procedures and Instructions

Ebasco site-generated construction, special process, and quality control procedures and instructions shall be transmitted to the Client or his designee for distribution to the established document control stations.

3.5 Field Change Requests

3.5.1 A Field Change Request shall be submitted to the Senior Resident Engineer from applicable site personnel whenever conditions arise which may warrant consideration by the Client or his designee of a change in the specified design.

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|---|------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 DOCUMENT CONTROL | SECTION QA-III-2 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 | | DATE 9/24/84 |

3.5.2 The Senior Resident Engineer shall submit the proposed Field Change Request to the Client or his designee for evaluation, disposition, distribution, and control by the Client or his designee in accordance with the Client's or his designee's written procedures.

3.5.2.1 In order to expedite field change requests associated with in-process activities against design drawings, an "Interim Approval" shall be obtained by the Senior Resident Engineer from the Client or his designee in accordance with approved site procedures.

3.6 Field Change Notice

3.6.1 A "Field Change Notice" shall be generated by the Senior Resident Engineer as is allowed by the design specification and shall be approved, issued, and controlled by the Senior Resident Engineer in accordance with approved site procedures.

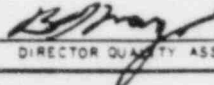
3.6.2 A Field Change Notice (FCN) is to provide construction with a method of documenting conditions (not tolerances) that are within criteria allowed by the applicable specifications. An FCN shall not be used in lieu of a Nonconformance Report (NCR) or a Field Change Request (FCR).

3.7 Field Sketches

3.7.1 Field sketches shall be prepared, reviewed, and approved by the Senior Resident Engineer or his designee in accordance with approved site procedures. Only the following two types of field sketches shall be permitted to be utilized by field personnel as a basis for the fabrication, installation, and inspection of safety-related items:

- a) Field sketches which have been approved by the Client or his designee.
- b) Field sketches which the Senior Resident Engineer has determined to be within standard detailing parameters established by specifications prepared by the Client or his designee.

3.7.2 Field sketches shall be transmitted by the Senior Resident Engineer to the Client or his designee for approval and/or distribution to the established document control stations by the Client or his designee.

| | | | |
|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 DOCUMENT CONTROL | SECTION QA-III-2 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

R8

4.0 CHANGES TO DOCUMENTS

Changes to Ebasco documents shall be distributed in the same manner as the original document. Revised documents shall be controlled in accordance with the requirements of this Section and/or written procedures in order to avoid inadvertent use of outdated documents.


5.0 QUALITY ASSURANCE RECORDS

Quality Assurance records shall be maintained by Site Quality Records which shall be audited by Site Quality Assurance to assure that they are maintained properly.

5.1 The system for control and retrieval of Quality Assurance records at the site shall be in accordance with Section QA-I-6 of this Manual.

6.0 AUDITS

Ebasco Site Quality Assurance shall audit the Client's or his designee's control and distribution of Ebasco-generated construction, special process, and quality control procedures and instructions in accordance with the requirements of Section QA-III-9 of this Manual.

| | | | |
|---|------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 | | DATE 9/24/84 |

R8

1.0 SCOPE

Quality-related activities at the construction site and Ebasco home office are independently audited by the Quality Assurance organization. This Section establishes the requirements and guidelines for the preparation, performance, reporting, and follow-up of quality assurance audits as performed by Site Quality Assurance, home office Quality Assurance Engineering, and the Ebasco Management Audit Committee.

2.0 RESPONSIBILITIES

2.1 The Ebasco Quality Assurance Site Supervisor or his designee from the Site Quality Assurance organization shall assign qualified Site Quality Assurance personnel to perform audits of construction site activities.

2.2 The Quality Assurance Engineering Supervisor of Auditing shall assign qualified Quality Assurance personnel to perform home office audits of Ebasco site activities.

2.3 A committee chaired by the Quality Assurance Consulting Engineer shall conduct audits of the Ebasco Materials Applications and Quality Assurance organizations at the home office.

3.0 GENERAL REQUIREMENTS FOR AUDITS PERFORMED BY THE QUALITY ASSURANCE ORGANIZATION

3.1 Audit Personnel


3.1.1 Audit personnel shall be independent of direct responsibility for performance of the activity being audited.

3.1.2 Audit personnel shall be qualified to perform quality assurance audits based on experience and training as described in Quality Assurance Procedure QA-G.3.

3.2 Training and Orientation

3.2.1 Audit personnel shall have experience and training or orientation to assure their competence for performing audits. The competence of personnel to perform audits shall be developed by one or more of the following methods:

- a) Providing personnel with working knowledge of appropriate regulatory documents, practices, codes, and standards.

| | | | |
|---|------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 | | DATE 9/24/84 |

RB

- b) Training or orientation in general and specialized methods of planning and performing audits.
- c) On-the-job training under direct supervision of a Lead Auditor.

3.2.2 The requirements for training and orientation of auditors shall be in accordance with Quality Assurance procedures.

3.3 Proficiency of Lead Auditors

3.3.1 Lead Auditors performing audits shall maintain their proficiency through one or more of the following methods:

- a) Regular, active participation in the audit process.
- b) Review and study of codes, standards, and procedures related to Quality Assurance Programs and program auditing.
- c) Participation in orientation or training programs.

3.3.2 The Director Quality Assurance or his designee shall evaluate Lead Auditors in accordance with Quality Assurance Procedure QA-G.3 to assure that the Lead Auditors are maintaining their proficiency.


3.4 Scheduling of Audits

3.4.1 Audits shall be initiated as early in the life of the project or activity as practicable in order to assure timely implementation of the applicable Quality Assurance Program requirements, and to assure effective quality assurance during construction activities.

3.4.2 Audits shall be regularly scheduled on the basis of the status and safety importance of the activities to assure conformance to the Ebasco Nuclear Quality Assurance Program. Applicable elements of the Quality Assurance Program shall be audited at least annually or once within the life of the activity, whichever is shorter.

3.4.3 Supplemental audits shall be conducted when:

- a) Significant changes in the Quality Assurance Program are made.

| | | | |
|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

R8

- b) There is evidence of significant noncompliance to the Quality Assurance Program.
- c) An assessment of the effectiveness of the Quality Assurance Program is requested.
- d) It is necessary to verify implementation of corrective action.
- e) It is considered necessary by the Quality Program Site Manager.

3.5 Planning of Audits


Preparation for audits shall include the development of a written audit plan of standard format which shall include or identify the following:

- a) Audit scope.
- b) Requirements and applicable documents.
- c) Activities to be audited.
- d) Organization to be audited.
- e) Tentative audit schedule.
- f) Approved written procedures and/or checklists which assure that the organization will be audited to the extent necessary. These procedures and/or checklists shall provide for verifying corrective action of deficiencies identified in previous audits. Audit procedures and/or checklists may be developed as part of a general audit program and need not be unique for each audit.

3.6 The Audit Team

3.6.1 The audit shall be performed by one or more individuals. A qualified Lead Auditor shall be established as the team leader for audits when teams are comprised of two or more auditors. When audits are performed by only one individual, that individual shall be a qualified Lead Auditor and considered to be the team leader. The team leader shall be responsible for:

- a) Orientation of the team.

| | | | |
|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

R8

- b) Assuring communication between the team and the organization being audited.
- c) Coordinating the preparation and issuance of audit reports.
- d) Establishing the pace of the audit.

3.6.2 The team leader shall assure that the team is prepared prior to performing the audit. Information such as appropriate procedures, manuals and prior audit reports shall be made available to the team members. Each auditor shall be provided with any appropriate audit plans, procedures, or checklists necessary to performing the audit.

3.7 Audit Notification

The organization to be audited shall be notified of a scheduled audit and the scope of the audit. Such notification shall be given a reasonable time before the audit is to be performed.

3.8 Audit Performance

3.8.1 Checklists and/or written procedures prepared during audit planning shall be used to conduct the audit.

3.8.2 An informal pre-audit conference shall be arranged at the audit site in order to confirm audit scope and discuss the audit plan.

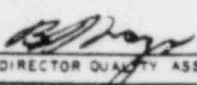
3.8.3 A post-audit conference shall be conducted to:

- a) Inform those audited of the audit results.
- b) Assure understanding of audit results.

3.9 Reporting of Audit Results

3.9.1 An audit report shall be compiled and shall be signed by the audit team leader. The audit report shall provide:

- a) Description of the audit scope.
- b) Identification of the auditors.

| | | | |
|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

- c) Persons contacted.
- d) A summary of the audit results, including an evaluation statement regarding the effectiveness of the Quality Assurance Program elements which were audited.
- e) Detailed description of Quality Assurance Program deficiencies and causes thereof where possible.
- f) Recommendations for correcting program deficiencies or improving the Quality Assurance Program, if possible.

3.9.2 The audit report shall be issued in a timely manner as defined in the applicable Quality Assurance procedure, but shall not exceed 30 days from the post-audit conference.

3.10 Audit Follow-Up


3.10.1 A response to the audit report shall be prepared by the responsible individual and submitted within the required time period as established in the audit report, but shall not exceed 30 days. The response shall state the corrective action taken or to be taken, and the date of completion. The audit team leader, or another qualified Lead Auditor or the management of the auditing group shall review the response for acceptance. As necessary, subsequent responses may be required to verify completion of corrective action.

3.10.2 Follow-up action shall be performed by a qualified Lead Auditor to:

- a) Assure that the written reply to the audit report is received.
- b) Assure that corrective action is identified and scheduled for each program deficiency.
- c) Confirm that deficiencies are resolved and corrective action, when necessary, is accomplished.

3.10.3 Follow-up action may be accomplished through written communication, re-audit, or other appropriate means.

3.10.4 Follow-up action taken shall be documented on the audit report.

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|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

R8

3.11 Trend Analysis of Audit Reports

The Quality Assurance Engineering Supervisor of Auditing shall make an analysis of the available data (such as the audit reports mentioned above) with respect to quality trends, and report the result of the analysis. Distribution of the trend analysis reports shall be made in accordance with the requirements of Quality Assurance Procedure QA-D.3.


4.0 SPECIFIC AUDIT REQUIREMENTS

4.1 Management Audits

4.1.1 A committee chaired by the Quality Assurance Consulting Engineer is responsible for conducting audits of Ebasco Materials Applications and Quality Assurance functions to determine compliance with the Ebasco Quality Assurance Program requirements. This committee is made up of personnel not in the Quality Assurance organization and who are qualified in accordance with criteria denoted in Ebasco Nuclear Procedure N-24. These audits will also include evaluating quality assurance policy effectiveness and assuring that appropriate implementing procedures are available and are being complied with.

4.1.2 This auditing shall be accomplished on an annual basis in accordance with the requirements of Ebasco Nuclear Procedure N-24. The management audit committee shall be comprised of at least two qualified representatives from either Ebasco Constructors Inc or Engineering, and the QA Consulting Engineer. Each committee representative shall be appointed by the respective group Vice President; however, no committee member can be directly engaged in any policy-making or administrative phase of the Ebasco Quality Assurance Program, but shall be knowledgeable in the general area of quality assurance. The committee shall be directly responsible to the Vice President Corporate Quality Programs.

4.1.3 The committee shall prepare an audit report for each audit performed. This report shall be submitted directly to the Vice President Corporate Quality Programs, with copies to other appropriate parties.

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|---|----------------------------|--|---------------------|
| EBASCO SERVICES INCORPORATED | | NUCLEAR QUALITY ASSURANCE PROGRAM MANUAL HOUSTON LIGHTING AND POWER COMPANY SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 & 2 QUALITY ASSURANCE AUDITS | SECTION QA-III-9 |
| APPROVAL  DIRECTOR QUALITY ASSURANCE | REVISION 6 DATE 9/24/84 | | |

4.1.4 The Vice President Corporate Quality Programs shall be responsible for informing the concerned Ebasco management of the results of the audits performed by the committee. He shall also be responsible for initiating the implementation of any changes or corrective action deemed necessary to improve the effectiveness of the Ebasco Nuclear Quality Assurance Program.

4.2 Audits by the Quality Assurance Organization

4.2.1 Site Quality Assurance shall audit the various quality-related activities performed by Ebasco organizations on the construction site in accordance with the requirements of this Section and applicable Site Quality Assurance procedures and instructions.

4.2.2 Training and qualification records for Site Quality Control personnel shall be audited in accordance with Section QA-I-3, Paragraph 8.0, of this Manual.

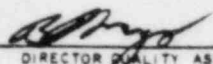
4.2.3 Quality Assurance auditors shall have the authority to reject items, services, or work for nonconformance to the specification, drawing, or quality control requirements.

4.2.4 Home office Quality Assurance Engineering will conduct periodic audits and evaluations of the construction site annually in accordance with this Manual and Quality Assurance Procedure QA-D.5.2.

5.0 AUDIT RECORDS

5.1 Records generated during audit preparation, performance, or follow-up shall be retained for all audits in accordance with the applicable requirements of Section QA-I-6 of this Manual and/or approved Quality Assurance procedures. Such records shall include:

- a) Audit plans and checklists.
- b) Audit reports.
- c) Written replies to audit reports.
- d) Status of required corrective action.
- e) Other documents which support audit findings and corrective action as appropriate.

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| APPROVAL  DIRECTOR QUALITY ASSURANCE | | | REVISION 6 DATE 9/24/84 |

5.2 Records of training and experience of auditors shall be maintained for all personnel who are performing audits or who have previously performed audits. These shall be retained for the same period of time as required for the audit reports with which the auditors are associated. Maintenance and retention shall be in accordance with Quality Assurance Procedure QA-G.3.