

Benjamin E. Tenzer  
Vice President  
Materials Engineering and  
Quality Assurance

March 13, 1981

Mr. Uldis Potapovs, Chief  
Vendor Inspection Branch  
United States Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 36012

Re: NRC letter from U. Potapovs, Docket No. 99900505  
Inspection Report No. 81-01, dated March 3, 1981

Dear Mr. Potapovs:

In response to your letter to Mr. B E Tenzer dated March 3, 1981, the following information is hereby submitted. Our responses are identified in accordance with the paragraph numbers used in the attachment to your letter, "Notice of Deviation."

ITEM A

Responsibilities of Management in regard to Ebasco Management Audit Function

The following revisions to Section QA-II-9, Rev. 2 of the Ebasco Nuclear Quality Assurance Program Manual (ETR-1001) will be submitted and recommended for acceptance to the Ebasco Quality Program Committee and the NRC QA Branch, Div. of Project Management in response to Notice of Nonconformance Item A, attached to NRC letter of 3/3/81 to B E Tenzer in regard to the NRC inspection conducted February 2-6, 1981:

- a) Revise last sentence of subpara. 3.4.2 to read, "The committee shall be directly responsible to the Vice President Materials Engineering and Quality Assurance."
- b) Revise second sentence of subpara. 3.4.3 to read, "This report shall be submitted directly to the Vice President Materials Engineering and Quality Assurance, with copies to other appropriate parties."
- c) Revise first sentence of subpara. 3.4.4 to read, "The Vice President Materials Engineering and Quality Assurance shall be responsible for informing the concerned Ebasco Management of the results of the audits performed by the committee."

We plan to submit the subject revision to the Bethesda office of the NRC by May 1, 1981. As soon as they approve the modifications, we will revise the applicable QA manual.

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ITEM B

Certification of Lead Auditors

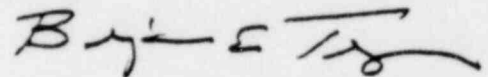
The qualification records for the two Quality Assurance auditors who are certified as lead auditors, but whose qualification files lack the audit records to support the qualification, have been supplemented in the files with the required data. This was done by obtaining the relevant audit reports from the Internal Audit Record files and completing the 1306-6 forms to indicate that the minimum requirement of 5 audits had been performed. To prevent recurrence, periodic internal audits of the Qualification Record files will be conducted and all necessary updating and completing of record files maintained at an acceptable level.

ITEM C

Minimum Quality Assurance Internal Audit Frequency

It has always been the intent in Quality Assurance internal audit planning and scheduling that a department would be audited to an extent commensurate with its level of activity subsequent to the last audit. A review of the subject implementing procedure indicates that perhaps clarification is required on this matter. Therefore, we will modify Procedure QA-D-5 to clarify that the auditing is performed at a frequency level commensurate with the level of work in a department. Procedure QA-D-5 paragraph 7.0 has been modified to read, "Each departmental operation (audit area) shall be reviewed during the six month interval, and audited to an extent commensurate with the level of activity for each project." The revised procedure will be issued by April 1, 1981.

Very truly yours,



BET:je

cc: B R Mazo