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| **ВNPP-2 Project**  **Principal Covering Letter No. and Date:**  *LTR-4300-99133563 dd. 07.04.2020* | **Title:**  *Quality Assurance Program of Azarab Industries Company for Development & manufacturing of equipment for BNPP-2 Project* |
| **Document Number:**  *BU2.2500.0.0.QM.QA0001, Revision B01* | **Section:** |

**Reviewer’s Name: AZARAB Co.**

| № | Subsection | The Contractor comment | AZARAB reply to the Contractor comments |
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| **1** | **2** | **3** | **4** |
|  | First title page | The name “Management System Program of Azarab Industries Company” should be replaced with “Quality Assurance Program of Azarab Industries Company for Manufacturing Equipment for BNPP-2 Project” and the following footnote must be added to the title sheet: “The meaning of the Quality Assurance Programme (QAP) is equivalent to the meaning of the Management System Programme (MSP)”. | Accepted.  Applied in the First title page. |
|  | General | * Imperative words like "shall" and "should" must be deleted from text of the QAP. * Replace “Annex” with “Appendix”. * The titles of internal documentation used in the text of the QAP must correspond to the titles specified in Appendix 7. * Not all documentation used in the QAP is listed in Appendix 7 (for example, STO 48546926.032-2018). * Correct typos in the QAP text: replace QAP001 with QAP-001, HIS-S01 with HIS-001, QPI006 with QPI-006, “Engineering” with “Engineering” etc.   AZARAB Co. needs to control the text and do the necessary actions. | Accepted.  Applied in whole the document. |
|  | Terms & definitions | The following definitions shall be defined: "Authority organization", “Contract”, “contract”, “main contract”, “General Designer”, “Suppliers”, “and Vendors”. | Accepted.  Applied in the Section Terms & definitions. |
|  | List of Abbreviations | Abbreviations DTS, GTS, IC, MSP, NACI, QAR, VMI, WBS are not used in the text of this QAP. | Accepted.  Applied in the Section List of Abbreviations. |
|  | 7.3 | * The procurement specifications shall be introduced. * Type of products that procured by AZARAB Co. shall be introduced. * Criteria for developing subcontractors QPs and participation of AZARAB Co. in their Control Points shall be explained and specified in this section. | Accepted.  Applied in the Item 7.3. |
|  | AZARAB Co. specialist shall control integrity verification of the package (no damage during transportation, safety of the package) and quantitative verification of the package (weight, counting the number of sets, completeness of delivery). | Accepted.  Applied in the items ??????????????. |
|  | 8 | The information specified in this section may be approval if the AZARAB Co. further develops management procedure “Identification and traceability” and submits it for approval/acceptance to the Contractor and the Principal. | Accepted.  This subject has been mentioned in Item № 8.2, based on item № 6 of MoM-4310-9902 dd. 22 02 1399. |
|  | 8.2 | Incorrect reference to the MP BU2.2500.0.0.QM.QA0002 | The comment is not clear. It is the number of MP, which will be developed by AZARAB for BNPP-2 Project. |
|  | 9 | Core processes, which are presented in Appendix 6, shall be described in section 9 and have similar names (Please clarify: does the Engineering process relate to the development process? The project management process is not specified in Appendix 6).  Specify the following elements in the QAP:  “During the inspection of process documentation, its availability for all process and control operations and the availability of all required signatures are verified. Production-verification documentation and production-engineering documentation for special process are agreed with the LMO.” | Accepted.  Applied in the items ??????????????. |
|  | If AZARAB Co. perform design or development activities these issues shall be considered in this section (see items 9.21, Appendices 6 and 7, which refer to the development/design process). | Accepted.  Applied in the items ??????????????. |
|  | 10 | The inspection and test process activities shall be defined in following sections:  10.1 General  10.1.1 Personnel Qualification;  10.1.2 Development and acceptance and closing of QP;  10.1.3 Nondestructive testing;  10.1.4 Laboratory tests;  10.1.5 Calibration support.  10.2 Incoming inspection.  10.3 In-process (during) of manufacturing inspection.  10.4 Final acceptance inspection.  In addition, for each section shall be explained how the Planning, Execution and Control are being done.  This comment will be approved when the MP “Inspections and tests” is developed and these requirements are taken into account. | Accepted.  This subject has been mentioned in Item № 10.17, based on item № 6 of MoM-4310-9902 dd. 22 02 1399. |
|  | 10 | Specify the following elements in the QAP:   * "Each subsequent stage of production (if necessary - the technological operations of production) in accordance of prepared QP can start only when the inspection and testing of the previous stage have been completed, including the development and approval of the report documents issued by the manufacturer.” * "Manufactured equipment is sent to Principal only after all of operations specified in the Quality Plans, Test Programs and Procedures, including the results confirming their compliance with the technical requirements are completed also acceptance inspection by representative of relevant party shall be carried out" | Accepted.  Applied in the items ??????????????. |
|  | 10.1 | Specify the following elements in the QAP:  “Prior to development and submission of QPs, AZARAB Co. shall be Registered by and shall be granted Permit for each manufacturing of equipment and the following documents shall be available:   * Technical Specification (TR, TA) for product * Design documents for components and assembly units for manufacturing of product * Issuance of the Basic Design documentation of each product, component * Acceptable results of examination of technical documents acquired for product, components, materials and semi-products * Approved manufacturing drawings (including CB, TB1, TB2) by LMO.” | Accepted.  Applied in the items ??????????????. |
|  | “It is required that the list of blanks, components and parts which are purchased for manufacturing of each product for BNPP-2 with determination of necessity of development of Quality plans /availability of certificate be submitted to the General Contractor/Principal.” | Accepted.  Applied in the items ??????????????. |
|  | 10 | Specify the following elements in the QAP:  “During the manufacture of product for BNPP-2, changes in the Quality Plans shall be made in the same sequence as for acceptance.” | Accepted.  Applied in the items ??????????????. |
|  | “For main parts that under pressure and have special process, AZARAB Co. is developed individual QP.” | ??? |
|  | “Acceptance test shall be carrying out in accordance with GOST R 15.301-2016 "System for developing and put-ting products into production. Products for industrial purposes. Procedure for developing and put-ting products for production" and type test shall be carried out in accordance with GOST 15.309-98 "System of product development and production. Testing and acceptance of manufactured products Basic provisions".” | ??? |
|  | “In case of unsatisfactory acceptance inspection:   * a non-conformance report is drawn up and measures is to be taken in accordance with section 11 and 12; * AZARAB Co. is eliminated detected during acceptance inspection non-conformities remarks; * Agree the new date of repeated acceptance inspection; * Acceptance re-inspection is conducted in an order similar to the initial acceptance inspection.” | Accepted.  Applied in the items ??????????????. |
|  | 10.11 | Delete “and” from the 3rd bullet. | Accepted.  Applied in the 3rd bullet of Item 10.11. |
|  | 10.5 | The “heat treatment” process specified in this item should be described in section 9. | ??? |
|  | 10.10 | Add a reference to MP BU2.0903.0.0.QM.QA0002 | Accepted.  Generally applied and mentioned in Item 10.17 of Section 10. |
|  | 10.13 | Delete the repeat:   * “The list of the documents are sent to the Principal together with each equipment include:” | Accepted.  Applied. |
|  | 10.14 | It is necessary to specify what permission is referred to in this item:  “…the permission for shipment to Bushehr site will be issued.” | Accepted.  Applied in the item 10.14. |
|  | 10.17 | This item should be moved to item 10. 1 | Accepted.  Applied. |
|  | 10.4 | Incoming Control of imported items (blanks, semi-finished, components and materials) (if any) shall be explained. | Accepted.  Applied in the items ??????????????. |
|  | 10.16 | Specify the following elements in the QAP:  “After repairs of the installations and measuring instruments, they should pass a mandatory testing, regardless of the date of the scheduled testing.” | ??? |
|  | 10 | Specify the following elements in the QAP:   * Documents to be submitted by the manufacturer to the Principal shall be properly packed; * Each package of the documents shall contain a packing sheet in 2 copies. | Accepted.  Applied in the items ??????????????. |
|  | 11 | The person responsible for this process must be specified (including preparing, approving, and submitting a non-conformances report to the AO/General Contractor and Principal). | Accepted.  Applied in the items ??????????????. |
|  | 14.1.11 | Replace " periodically” with “on quarterly basis” | Accepted.  Applied. |
|  | 14.1.24 and  14.1.27 | This STO 48546926.032-2018 "Standard of organization. Suppliers 'audits" is not included in Appendix 7 | Accepted.  Applied. |
|  | Appendix 3 and 5 | “Quality control inspection department”, “inspection department”, “Quality Assurance Laboratory”, “Engineering department”, “marketing department” are not in defined in Organizational Chart. AZARAB Co. needs to control the text and do the necessary actions. | Accepted.  Applied. |
|  | Appendix 3B | Delete this Appendix because it repeats Appendix 5. | In Appendix 3B, has been just indicated "Organizational Chart of the Project", but in App. 5 "Internal Interface Structure" has been also included "Organizational Chart of the Project" for comparison and better understanding. |
|  | Appendix 4 | Based on letter No. 98/3385 dd. 19.08.2019 by the Customer for Azarab Co. it is JSC "AME". In this version of the Program, the Customer is JSC ASE. Please clarify this change. | Accepted.  Applied.  The first version related to letter № 98/3385 dd. 19.08.2019 is regarding to the scope of "Manufacturing" whose contract is concluded with AME, but the second submission is related to scope of "Development & Manufacturing" whose contract is concluded with ASE. |
|  | * “Authorized Organization” should be excluded from Principal. “Authorized Organization” with a contractual relation from ASE JSC must   be added to the scheme. | Accepted.  Applied. |
| * Rename an “administrative” to a “contractual”, “legal interact” to a “supervisory state control”. | Accepted.  Applied. |
| * The “General Designer” with a contractual relation from ASE JSC must be added to the scheme. | Accepted.  Applied. |
| * Legal interaction between INRA and AZARAB Co. and suppliers should be replaced on “supervision (inspection)”. | Accepted.  Applied. |
| * “Legal interact” of the INRA with the General Contractor should be excluded. | Accepted.  Applied. |
| * “Correspondence” of the Principal with AZARAB Co. should be excluded. | Accepted.  Applied. |
| * “Supervision (inspection)” and “correspondence” of the Principal with the General Contractor should be excluded. | ??? |
|  | Notes 3 and 4 of Appendix 4 | Notes 3 and 4 should be merged. | Accepted.  Applied. |
|  | Appendix 7 | * Correct the form of Appendix 7 in accordance with the form accepted by the Principal and sent to your address by letter No. 007-01/22909 dd. 11.10.2019. * Need to update the "Item of QAP" column. * MP BU2.0903.0.0.QM.QA0009 must be moved to table 7.2. * The codes for management procedures BU2.2007.0.0.QM.QA0002 and BU2.2007.0.0.QM.QA0003 are incorrect in item 7.2.1. | Accepted.  Applied. |
|  | Appendix 11 | Responsibilities and authorities shall be separated from each other. | Accepted.  Applied. |
|  | CHANGE RECORD SHEET | Change record sheet must be added to the QAP. | Accepted.  Applied. |