

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Pipeline Safety OIR
Rulemaking 11 -02-019
Data Response**

PG&E Data Request No.:	LocalUnions246and342_001-04		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246and342_001-Q04		
Request Date:	August 5, 2011	Requester DR No.:	001
Date Sent:	August 11, 2011	Requesting Party:	Local Unions 246 and 342
PG&E Witness:	Todd Hogenson	Requester:	Jack Davis

SUBJECT: ENSURING INDEPENDENCE –IMPLEMENTATION PLAN

QUESTION 4

What will PG&E propose for ensuring that inspectors, X-ray providers, other jobsite observers and those administering worker-qualification tests will render their services with objectivity and independence from PG&E?

ANSWER 4

The interpretation of the radiographic films shall be evaluated by PG&E or a designated 3rd party NDT firm by Level II certified radiograph technicians (ANSI/ASNT CP-189) on the basis of API 1104, 18th Edition. PG&E conducts a visual and radiographic inspection on all welds according to PG&E Gas Standards, to ensure that the standard of acceptability for all welding equals or exceeds the requirements of API Standard 1104, 18th Edition, "A Standard for Field Welding of Pipelines." Radiographic summary reports are acquired by PG&E and placed in the job folder for the subject pipe segment for the life of the facility.