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June 10, 2013

Mr. Michael Robertson
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Re: Update on April 2011 General Order 112-E Audit of PG&E's Integrity Management Program

Dear Mr. Robertson:

The Safety and Enforcement Division (SED) of the CPUC conducted a risk assessment audit of PG&E's Integrity Management Program on April 5 - 8, 2011 and issued a letter of inspection findings on August 31, 2012. In the August 31, 2012 letter, Item I.a.(4), SED requested PG&E to provide an update on the progress of 62.5 miles of hydrostatic testing or replacement of pipeline segments that were determined to be stable for manufacturing threat based on mill pressure test history.

This letter provides PG&E's update to the CPUC request. A status update for the 62.51 miles is shown in Table 1. There were no test failures involved with any of the segments listed in Table 1. A status update for the 2.92 miles of pipe identified as requiring further review is shown in Table 2. There were no test failures involved with any of the segments listed in Table 2.

Additionally, PG&E wishes to clarify its position regarding the concern raised in the August 31, 2012 letter for Item I.a.(3) regarding PHMSA protocol C.01.a.iv and C.01.a.xi, and 49 CFR 192.917(e)(3) and (e)(4). PG&E stated in its response to SED on October 17, 2012 that "PG&E believes it meets the intent of 49 CFR §§ 192.917(e)(3) and 192.917(e)(4). PG&E is analyzing the threat stability and potential for failure for every pressure increase over the maximum operating pressure (MOP) through an engineering critical assessment (ECA). The ECA approach is based on the information provided in Report 1205 [Redacted] [Redacted]"

¹ Note that the original request referenced 62.65 miles; however this was a typographical error in the original [Redacted] report.

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As part of its continuous improvement efforts, PG&E has revised Risk Management Procedure RMP16, "Threat Identification," to discontinue the use of mill pressure test records in the determination of stability of manufacturing threats. While the use of those records was acceptable, under the revised procedure a manufacturing threat can be determined stable only by means of a post-construction pressure test of at least 1.25 X MAOP.

Please contact [Redacted] at [Redacted] for any additional questions you may have regarding this notification.

Sincerely,

/S/
Frances Yee
Acting Director, Regulatory Compliance and Support

Attachments

cc: Dennis Lee, CPUC
Liza Malashenko, CPUC
Paul Penney, CPUC
Sunil Shori, CPUC

Bennie Barnes, PG&E

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Shilpa Ramaiya, PG&E
Jesus Soto, PG&E
Roland Trevino, PG&E
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Table 1. Status Update of 62.51 Miles of Pipeline Segments with Manufacturing Threats

ROUTE	SEGMENT NUMBER	FOOTAGE	Mileage	Manufacturing Threat Determination with Regard to MOP Excursions	Status	Date Completed
191	110	3038	0.575	Stable	Test Scheduled	Future Date
191	111	348	0.066	Stable	Test Scheduled	Future Date
191	111.5	805	0.152	Stable	Test Scheduled	Future Date
191	111.7	2467	0.467	Stable	Test Scheduled	Future Date
191	112.3	46	0.009	Stable	Test Scheduled	Future Date
191	112.6	213	0.040	Stable	Test Scheduled	Future Date
191	113.3	1652	0.313	Stable	Test Scheduled	Future Date
191	113.4	2959	0.560	Stable	Test Scheduled	Future Date
0604-16	16.2	2	0.000	Stable	Replacement Scheduled	Future Date
210B	122.3	91	0.017	Stable	Test Completed	10/18/12
210B	122.9	189	0.036	Stable	Test Completed	10/18/12
210B	124.3	453	0.086	Stable	Test Completed	10/18/12
GCUST5885	104	571	0.108	Stable	Replacement Scheduled	Future Date
7221-10	108.08	573	0.109	Stable	Test Completed	4/26/12
7221-10	108.1	1058	0.200	Stable	Test Completed	4/26/12
7221-10	108.25	4147	0.785	Stable	Test Completed	4/26/12
7221-10	117.3	200	0.038	Stable	Replacement Scheduled	Future Date
DCUST2823	101.6	80	0.015	Stable	Replacement Scheduled	Future Date
DCUST2823	104	731	0.138	Stable	Replacement Scheduled	Future Date
111A	140	560	0.106	Stable	Replacement Scheduled	Future Date
111A	142	4	0.001	Stable	Replacement Scheduled	Future Date
111A	142.2	1462	0.277	Stable	Replacement Scheduled	Future Date
111A	144	784	0.148	Stable	Replacement Scheduled	Future Date
111A	145	395	0.075	Stable	Replacement Scheduled	Future Date
118A	102.5	139	0.026	Stable	Test Scheduled	Future Date
118A	114.5	737	0.140	Stable	Replacement Scheduled	Future Date
118A	115	469	0.089	Stable	Replacement Scheduled	Future Date
118A	120	73	0.014	Stable	Replacement Scheduled	Future Date
118A	120.4	460	0.087	Stable	Replacement Scheduled	Future Date
118A	120.5	616	0.117	Stable	Replacement Scheduled	Future Date
118A	120.9	206	0.039	Stable	Replacement Scheduled	Future Date
118A	202	1331	0.252	Stable	Test Completed	6/29/12
118A	218.6	203	0.038	Stable	Test Scheduled	Future Date
118B	101	452	0.086	Stable	Previously Tested	9/5/62
118B	101.5	1150	0.218	Stable	Previously Tested	9/5/62
118B	102	817	0.155	Stable	Previously Tested	9/5/62
118B	107	1106	0.209	Stable	Test Scheduled	Future Date
118B	107.2	255	0.048	Stable	Test Scheduled	Future Date
118B	107.8	311	0.059	Stable	Test Scheduled	Future Date
118B	108	819	0.155	Stable	Test Scheduled	Future Date
118B	111.27	1205	0.228	Stable	Test Scheduled	Future Date
118B	116	137	0.026	Stable	Test Scheduled	Future Date
118B	116.5	607	0.115	Stable	Test Scheduled	Future Date
118B	117	1199	0.227	Stable	Test Scheduled	Future Date
118B	119.73	1528	0.289	Stable	Test Scheduled	Future Date
118B	120	262	0.050	Stable	Test Scheduled	Future Date
118B	120.1	887	0.168	Stable	Test Scheduled	Future Date
118B	120.4	52	0.010	Stable	Test Scheduled	Future Date
118B	120.8	137	0.026	Stable	Test Scheduled	Future Date
118B	121.94	304	0.058	Stable	Test Scheduled	Future Date
118B	122	2131	0.404	Stable	Test Scheduled	Future Date
118B	123	473	0.090	Stable	Test Scheduled	Future Date
118B	123.5	1204	0.228	Stable	Test Scheduled	Future Date
118B	124	299	0.057	Stable	Test Scheduled	Future Date
118B	124.5	1912	0.362	Stable	Test Scheduled	Future Date
118B	125	2003	0.379	Stable	Test Scheduled	Future Date
118B	126.3	679	0.129	Stable	Test Scheduled	Future Date
118B	126.5	1897	0.359	Stable	Test Scheduled	Future Date
118B	129.8	785	0.149	Stable	Test Scheduled	Future Date
118B	130	2019	0.382	Stable	Test Scheduled	Future Date
118B	132.88	384	0.073	Stable	Test Scheduled	Future Date
118B	133	946	0.179	Stable	Test Scheduled	Future Date
118B	134.3	204	0.039	Stable	Test Scheduled	Future Date
118B	134.5	166	0.031	Stable	Test Scheduled	Future Date
118B	134.7	856	0.162	Stable	Test Scheduled	Future Date
7204-01	101	325	0.062	Stable	Test Scheduled	Future Date
DREG4388	119	359	0.068	Stable	Replacement Scheduled	Future Date
197C-1	214.5	1277	0.242	Stable	Test Scheduled	Future Date
197C-1	224	488	0.092	Stable	Test Scheduled	Future Date
1603-01	204	915	0.173	Stable	Test Scheduled	Future Date
1603-01	206	2178	0.413	Stable	Test Scheduled	Future Date
1611-03	111	1831	0.347	Stable	Previously Tested	10/6/67
1611-03	112	146	0.028	Stable	Previously Tested	10/6/67
1611-03	112.5	1128	0.214	Stable	Previously Tested	9/19/67
1611-03	112.8	697	0.132	Stable	Previously Tested	9/19/67
1611-03	113	2585	0.490	Stable	Previously Tested	8/30/1967 & 9/19/1967
1611-03	113.5	1569	0.297	Stable	Previously Tested	8/30/67
GCUST5969	302	537	0.102	Stable	Replacement Scheduled	Future Date
1607-01	105.1	104	0.020	Stable	Replacement Scheduled	Future Date
GCUST5842	215.4	130	0.025	Stable	Replacement Scheduled	Future Date
301F	105.4	347	0.066	Stable	Previously Tested	Future Date
1815-02	218.6	1360	0.258	Stable	Replacement Scheduled	Future Date
1815-02	226	3062	0.580	Stable	Previously Tested	3/22/1967 & 3/18/1968

Table 1. Status Update of 62.51 Miles of Pipeline Segments with Manufacturing Threats

ROUTE	SEGMENT NUMBER	FOOTAGE	Mileage	Manufacturing Threat Determination with Regard to MOP Excursions	Status	Date Completed
1815-02	240	1268	0.240	Stable	Replacement Scheduled	Future Date
1815-15	102	1017	0.193	Stable	Previously Tested	8/27/62
1815-15	108	528	0.100	Stable	Test Scheduled	Future Date
1815-15	115	805	0.152	Stable	Test Scheduled	Future Date
1815-15	130.3	437	0.083	Stable	Test Scheduled	Future Date
1815-02	118	211	0.040	Stable	Previously Tested	12/12/67
1815-02	121	485	0.092	Stable	Previously Tested	12/12/67
1815-02	218	500	0.095	Stable	Replacement Scheduled	Future Date
187	127.1	1884	0.357	Stable	Test Scheduled	Future Date
187	138.35	45	0.009	Stable	Test Scheduled	Future Date
187	138.4	120	0.023	Stable	Test Scheduled	Future Date
187	138.6	343	0.065	Stable	Test Scheduled	Future Date
187	139	158	0.030	Stable	Test Scheduled	Future Date
187	139.2	535	0.101	Stable	Test Scheduled	Future Date
187	140	554	0.105	Stable	Test Scheduled	Future Date
187	141.5	496	0.094	Stable	Test Scheduled	Future Date
187	144	592	0.112	Stable	Test Scheduled	Future Date
187	144.2	909	0.172	Stable	Test Scheduled	Future Date
187	144.4	976	0.185	Stable	Test Scheduled	Future Date
187	147.2	248	0.047	Stable	Test Scheduled	Future Date
187	147.3	376	0.071	Stable	Test Scheduled	Future Date
187	148	3794	0.719	Stable	Test Scheduled	Future Date
187	148.4	960	0.182	Stable	Test Scheduled	Future Date
187	149.2	655	0.124	Stable	Test Scheduled	Future Date
187	152.8	683	0.129	Stable	Test Scheduled	Future Date
187	153.7	690	0.131	Stable	Test Scheduled	Future Date
187	164.7	180	0.034	Stable	Test Scheduled	Future Date
187	165	852	0.161	Stable	Test Scheduled	Future Date
1816-01	223	2214	0.419	Stable	Test Scheduled	Future Date
1816-01	223.5	752	0.142	Stable	Test Scheduled	Future Date
1816-01	229	1821	0.345	Stable	Test Scheduled	Future Date
1816-01	230.3	296	0.056	Stable	Test Scheduled	Future Date
1816-01	230.6	103	0.020	Stable	Test Scheduled	Future Date
1816-01	232.5	1579	0.299	Stable	Test Scheduled	Future Date
1816-01	232.6	232	0.044	Stable	Test Scheduled	Future Date
1816-01	232.8	1234	0.234	Stable	Test Scheduled	Future Date
1816-01	233.3	525	0.099	Stable	Test Scheduled	Future Date
1816-02	101	16	0.003	Stable	Test Scheduled	Future Date
1816-02	102	623	0.118	Stable	Test Scheduled	Future Date
1816-15	301	2472	0.468	Stable	Test Scheduled	Future Date
1816-15	306	359	0.068	Stable	Test Scheduled	Future Date
1816-15	309.5	1308	0.248	Stable	Test Scheduled	Future Date
1816-15	323	1078	0.204	Stable	Test Scheduled	Future Date
DREG5130	208	80	0.015	Stable	Replacement Scheduled	Future Date
DREG5130	212	52	0.010	Stable	Replacement Scheduled	Future Date
DREG5130	551.7	93	0.018	Stable	Replacement Scheduled	Future Date
0817-01	121	1082	0.205	Stable	Test Scheduled	Future Date
0817-01	129.1	72	0.014	Stable	Test Scheduled	Future Date
0817-01	129.4	2358	0.447	Stable	Test Scheduled	Future Date
0817-01	129.6	418	0.079	Stable	Test Scheduled	Future Date
0817-01	129.8	479	0.091	Stable	Test Scheduled	Future Date
0817-01	130	304	0.058	Stable	Test Scheduled	Future Date
138	130	819	0.155	Stable	Test Scheduled	Future Date
138	130.4	1177	0.223	Stable	Replacement Scheduled	Future Date
138	133.2	1084	0.205	Stable	Replacement Scheduled	Future Date
300B	193	462	0.088	Stable	Replacement Scheduled	Future Date
300B	194	381	0.072	Stable	Replacement Scheduled	Future Date
132	171.25	986	0.187	Stable	Test Completed	10/20/11
132	197.5	85	0.016	Stable	Test Scheduled	Future Date
132	197.7	880	0.167	Stable	Test Completed	6/6/12
132	198	4630	0.877	Stable	Test Completed	6/6/12
132	200	3223	0.610	Stable	Test Completed	7/3/12
132	200.2	5546	1.050	Stable	Test Completed	7/3/12
132	200.3	158	0.030	Stable	Test Completed	7/3/12
132	201.5	470	0.089	Stable	Test Completed	7/3/12
132	204	57	0.011	Stable	Test Completed	7/5/11
132	204.1	935	0.177	Stable	Test Completed	7/5/11
132	205	2913	0.552	Stable	Test Completed	7/5/11
132	207	2025	0.384	Stable	Test Completed	7/5/11
132	208	398	0.075	Stable	Test Completed	7/5/11
132	209	156	0.030	Stable	Test Completed	7/5/11
132B	102	10	0.002	Stable	Replacement Scheduled	Future Date
1401-01	301	4	0.001	Stable	Test Completed	7/5/11
1401-01	302	3	0.001	Stable	Test Completed	7/5/11
1406-01	501	2	0.000	Stable	Retired	N/A
1406-01	502	2	0.000	Stable	Retired	N/A
GCUST6984	600	8	0.002	Stable	Retired	N/A
GCUST6984	601	20	0.004	Stable	Retired	N/A
153	147	6	0.001	Stable	Test Completed	8/30/12
153	147.05	1454	0.275	Stable	Test Completed	8/30/12
153	147.45	332	0.063	Stable	Test Completed	8/30/12
153	147.7	2422	0.459	Stable	Test Completed	8/30/12
153	147.78	7567	1.433	Stable	Test Completed	8/30/12
153	147.9	4965	0.940	Stable	Test Completed	11/17/12

Table 1. Status Update of 62.51 Miles of Pipeline Segments with Manufacturing Threats

ROUTE	SEGMENT NUMBER	FOOTAGE	Mileage	Manufacturing Threat Determination with Regard to MOP Excursions	Status	Date Completed
153	148.4	1366	0.259	Stable	Test Completed	11/17/12
153	150	5943	1.126	Stable	Test Completed	11/17/12
153	150.5	111	0.021	Stable	Test Completed	11/17/12
191-1	131.5	1238	0.234	Stable	Test Scheduled	Future Date
3002-01	100.2	90	0.017	Stable	Replacement Scheduled	Future Date
0211-01	105.3	272	0.052	Stable	Test Scheduled	Future Date
137B	102.6	849	0.161	Stable	Test Scheduled	Future Date
137B	103.2	1158	0.219	Stable	Test Scheduled	Future Date
137B	105	1328	0.252	Stable	Test Scheduled	Future Date
137B	107.1	782	0.148	Stable	Test Scheduled	Future Date
137B	107.5	1686	0.319	Stable	Test Scheduled	Future Date
021H	107.3	186	0.035	Stable	Replacement Scheduled	Future Date
021H	107.6	35	0.007	Stable	Replacement Scheduled	Future Date
021H	116.9	212	0.040	Stable	Replacement Scheduled	Future Date
021H	119.3	294	0.056	Stable	Replacement Scheduled	Future Date
021E	101.3	403	0.076	Stable	Previously Tested	7/3/1964 & 11/30/2010
021E	102	4911	0.930	Stable	Previously Tested	7/3/64
021E	103	462	0.088	Stable	Previously Tested	8/22/66
021E	103.14	681	0.129	Stable	Previously Tested	8/22/66
021E	103.4	1125	0.213	Stable	Previously Tested	8/22/66
021E	103.9	134	0.025	Stable	Previously Tested	8/22/66
021E	104	311	0.059	Stable	Previously Tested	8/22/66
021E	104.1	1009	0.191	Stable	Previously Tested	8/22/66
021E	105	963	0.182	Stable	Previously Tested	8/22/66
021E	105.6	100	0.019	Stable	Previously Tested	6/5/89
021E	105.9	265	0.050	Stable	Previously Tested	8/22/66
021E	107	3984	0.755	Stable	Previously Tested	8/22/66
021E	107.2	672	0.127	Stable	Previously Tested	8/22/1966 & 4/4/2002 & 3/31/2008
021E	108	990	0.188	Stable	Previously Tested	8/22/66
021E	109	814	0.154	Stable	Previously Tested	8/22/66
021E	110.2	1062	0.201	Stable	Previously Tested	8/22/66
021E	110.3	1049	0.199	Stable	Previously Tested	8/22/66
021E	111	1422	0.269	Stable	Previously Tested	8/22/66
021E	111.35	3305	0.626	Stable	Previously Tested	8/22/1966 & 9/16/1966 & 3/31/2008
021E	111.4	887	0.168	Stable	Previously Tested	9/16/66
021E	111.7	1848	0.350	Stable	Previously Tested	9/16/66
021E	111.75	1737	0.329	Stable	Previously Tested	9/16/66
021E	112.1	2346	0.444	Stable	Previously Tested	9/16/66
021E	112.25	751	0.142	Stable	Previously Tested	9/16/66
021E	112.3	340	0.064	Stable	Previously Tested	9/16/66
021E	113	1186	0.225	Stable	Previously Tested	9/16/66
021E	114.5	90	0.017	Stable	Previously Tested	12/4/1966 & 5/17/2006
021E	114.7	807	0.153	Stable	Previously Tested	12/4/66
021E	116	585	0.111	Stable	Previously Tested	12/4/66
021E	117	426	0.081	Stable	Previously Tested	12/4/66
021E	119.15	1224	0.232	Stable	Previously Tested	12/4/66
021E	119.25	2060	0.390	Stable	Previously Tested	12/4/66
021E	119.3	437	0.083	Stable	Previously Tested	12/4/66
021E	120	637	0.121	Stable	Previously Tested	12/4/66
021E	120.2	229	0.043	Stable	Previously Tested	12/4/66
021E	124	640	0.121	Stable	Previously Tested	12/4/66
021E	125	451	0.085	Stable	Previously Tested	12/4/66
021E	127.1	1565	0.296	Stable	Previously Tested	12/4/66
021E	129.2	2384	0.452	Stable	Previously Tested	12/4/66
021E	130.5	376	0.071	Stable	Previously Tested	12/4/66
021E	131	2585	0.490	Stable	ILI'd	12/11/07
021E	134.1	1229	0.233	Stable	Previously Tested	12/4/66
021E	136.3	358	0.068	Stable	Previously Tested	12/4/66
021E	137	795	0.151	Stable	Previously Tested	12/4/66
021E	139	600	0.114	Stable	Previously Tested	12/4/66
021E	140	988	0.183	Stable	Previously Tested	12/4/66
021E	140.4	1141	0.216	Stable	Previously Tested	12/4/66
021E	142.5	569	0.108	Stable	Previously Tested	12/4/66
021E	143	5581	1.057	Stable	Previously Tested	12/4/1966 & 10/17/1980 & 3/21/2006 & 7/19/2006
021E	144	4323	0.819	Stable	ILI'd	12/11/07
021E	144.6	472	0.089	Stable	Previously Tested	12/4/66
021E	145	2556	0.484	Stable	ILI'd	12/11/07
021E	145.3	232	0.044	Stable	Previously Tested	5/8/67
021E	155.5	242	0.046	Stable	Previously Tested	4/18/67
021E	156	877	0.166	Stable	ILI'd	3/5/12
021E	157.2	164	0.031	Stable	ILI'd	3/5/12
021E	158	4208	0.797	Stable	Previously Tested	3/18/67
021E	158.3	130	0.025	Stable	Previously Tested	3/18/67
021E	158.5	577	0.109	Stable	Previously Tested	3/18/67
021E	164.5	696	0.132	Stable	Previously Tested	3/18/67
021E	165	3106	0.588	Stable	Previously Tested	3/18/67
021E	166.19	913	0.173	Stable	Previously Tested	3/18/67
021E	166.5	374	0.071	Stable	Previously Tested	3/18/67
021E	167.6	8610	1.631	Stable	ILI'd	3/5/12
021E	167.9	247	0.047	Stable	ILI'd	3/5/12
DREG3825	100.6	106	0.020	Stable	Replacement Scheduled	Future Date
021E	168	1056	0.200	Stable	Previously Tested	3/18/67
021E	168.5	358	0.068	Stable	Previously Tested	3/18/67
021E	168.7	601	0.114	Stable	Previously Tested	3/18/67

Table 1. Status Update of 62.51 Miles of Pipeline Segments with Manufacturing Threats

ROUTE	SEGMENT NUMBER	FOOTAGE	Mileage	Manufacturing Threat Determination with Regard to MOP Excursions	Status	Date Completed
021E	168.73	3202	0.606	Stable	Previously Tested	3/18/67
021C	107.6	46	0.009	Stable	Test Scheduled	Future Date
021C	111.3	79	0.015	Stable	Test Scheduled	Future Date
021C	114.9	96	0.018	Stable	Test Scheduled	Future Date
021D	113.1	285	0.054	Stable	Previously Tested	9/21/64
021C	105	4716	0.893	Stable	Previously Tested	1/29/65
021C	105.3	12	0.002	Stable	Previously Tested	1/29/1965 & 11/15/2010
021C	105.9	63	0.012	Stable	Replacement Scheduled	Future Date
0401-01	103.5	4723	0.895	Stable	Distribution	N/A
0401-01	105	2606	0.494	Stable	Distribution	N/A
0401-01	110	692	0.131	Stable	Distribution	N/A
0402-01	126	1051	0.199	Stable	Distribution	N/A
0402-01	132	887	0.168	Stable	Distribution	N/A
0402-01	133	233	0.044	Stable	Distribution	N/A
0402-01	134	420	0.080	Stable	Distribution	N/A
0402-01	134.2	5	0.001	Stable	Distribution	N/A
0402-01	134.5	2	0.000	Stable	Distribution	N/A
0402-01	134.7	16	0.003	Stable	Distribution	N/A
126A	104	1761	0.334	Stable	Test Scheduled	Future Date
126A	104.6	104	0.020	Stable	Test Scheduled	Future Date
126A	104.8	181	0.034	Stable	Test Scheduled	Future Date
177A	238.2	1428	0.270	Stable	Previously Tested	12/7/57
177A	244.2	1345	0.255	Stable	Previously Tested	10/19/57
177A	246.7	1546	0.293	Stable	Previously Tested	10/19/57
021E	203.8	105	0.020	Stable	Test Scheduled	Future Date
0618-03	114.5	3449	0.653	Stable	Previously Tested	7/1/69
0618-03	114.65	8	0.002	Stable	Previously Tested	7/7/70
177B	112.2	684	0.130	Stable	Test Scheduled	Future Date
177B	112.3	801	0.152	Stable	Test Scheduled	Future Date
177B	114	317	0.060	Stable	Test Scheduled	Future Date
177B	114.5	1018	0.193	Stable	Test Scheduled	Future Date
0630-01	103.2	153	0.029	Stable	Test Scheduled	Future Date
DREG5282	102.5	1195	0.226	Stable	Replacement Scheduled	Future Date
119B	116.3	158	0.030	Stable	Test Scheduled	Future Date
173	109	3483	0.660	Stable	Previously Tested	10/15/62
119A	111.4	16	0.003	Stable	Previously Tested	9/13/01
119A	119.22	749	0.142	Stable	Previously Tested	9/27/01
172C	522	38	0.007	Stable	Previously Tested	9/14/01
172C	524	1247	0.236	Stable	Previously Tested	9/14/01
172C	526	16	0.003	Stable	Previously Tested	9/14/01
0604-01	107	130	0.025	Stable	Test Scheduled	Future Date
0604-01	109	307	0.058	Stable	Test Scheduled	Future Date
0604-06	123	895	0.170	Stable	Test Scheduled	Future Date
0604-06	125	4009	0.759	Stable	Test Scheduled	Future Date
0604-06	125.2	659	0.125	Stable	Test Scheduled	Future Date
0604-06	126	434	0.082	Stable	Test Scheduled	Future Date
0604-06	126.5	226	0.043	Stable	Test Scheduled	Future Date
0604-06	127.3	1	0.000	Stable	Test Scheduled	Future Date
0604-06	132	157	0.030	Stable	Test Scheduled	Future Date
0604-07	143	449	0.085	Stable	Test Scheduled	Future Date
GCUST5770	101	55	0.010	Stable	Replacement Scheduled	Future Date
124A	120.8	1895	0.359	Stable	Replacement Scheduled	Future Date
124A	124.8	127	0.024	Stable	Replacement Scheduled	Future Date
124A	125	590	0.112	Stable	Replacement Scheduled	Future Date
124A	126	834	0.158	Stable	Replacement Scheduled	Future Date
124A	128	12578	2.382	Stable	Replacement Scheduled	Future Date
202	112.5	1725	0.327	Stable	Previously Tested	12/17/69
202	113	1097	0.208	Stable	Previously Tested	12/17/69
202	120	586	0.111	Stable	Previously Tested	12/8/69
124A	118.9	34	0.006	Stable	Replacement Scheduled	Future Date
124A	120	2516	0.477	Stable	Replacement Scheduled	Future Date
167	134	315	0.060	Stable	Replacement Scheduled	Future Date
167	135	347	0.066	Stable	Replacement Scheduled	Future Date
050A	113.5	619	0.117	Stable	Test Scheduled	Future Date
1503-01	114.9	305	0.058	Stable	Replacement Scheduled	Future Date
N/A - Further Review Not Necessary						

Table 2. Status Update of 2.92 Miles of Pipe Previously Identified for Further Review

ROUTE	SEGMENT NUMBER	FOOTAGE	Mileage	Manufacturing Threat Determination with Regard to MOP Excursions	Status	Date Completed
114	134.57	9	0.002	Further Review	Replacement Scheduled	Future Date
118A	101	953	0.180	Further Review	Test Completed	5/21/12
197A	124.35	1026	0.194	Further Review	Replacement Completed	8/9/12
197A	124.6	16	0.003	Further Review	Replacement Completed	8/9/12
111A	128.7	2613	0.495	Further Review	Distribution	N/A
301F	105.6	81	0.015	Further Review	Previously Tested	1/4/66
1816-01	221.6	212	0.040	Further Review	Test Scheduled	Future Date
1401-01	305	30	0.006	Further Review	Test Completed	7/5/11
1401-01	313	813	0.154	Further Review	Distribution	N/A
1401-01	315	2923	0.554	Further Review	Distribution	N/A
153-6	101	4	0.001	Further Review	Replacement Completed	10/19/12
153-6	101.5	170	0.032	Further Review	Replacement Completed	10/19/12
0401-01	113	2853	0.540	Further Review	Test Scheduled	Future Date
X6896	100.3	38	0.007	Further Review	Replacement Scheduled	Future Date
0603-01	101.1	6	0.001	Further Review	Previously Tested	2/27/92
DCUST2245	101	66	0.013	Further Review	No longer HCA	N/A
DCUST2823	101	3	0.001	Further Review	Replacement Scheduled	Future Date
DCUST2823	101.1	852	0.161	Further Review	Replacement Scheduled	Future Date
DCUST2823	103	511	0.097	Further Review	Replacement Scheduled	Future Date
DCUST2823	104.3	450	0.085	Further Review	Replacement Scheduled	Future Date
DREG4387	100	42	0.008	Further Review	Distribution	N/A
DREG4454	101	148	0.028	Further Review	Replacement Scheduled	Future Date
DREG5090	201	150	0.028	Further Review	Distribution	N/A
0837-01	111	145	0.027	Further Review	Replacement Completed	8/14/12
DREG4196	801	45	0.009	Further Review	Previously Tested	11/16/88
DREG4196	802	60	0.011	Further Review	Previously Tested	11/16/88
1406-01	503	49	0.009	Further Review	Previously Tested	12/21/62
GCUST6984	609	206	0.039	Further Review	Retired	N/A
GCUST6984	618	24	0.005	Further Review	Retired	N/A
GCUST6984	625	310	0.059	Further Review	Retired	N/A
X6437	208.5	5	0.001	Further Review	Retired	N/A
DREG3878	101	35	0.007	Further Review	Distribution	N/A
DREG3878	102	74	0.014	Further Review	Distribution	N/A
DREG3828	100	111	0.021	Further Review	Replacement Scheduled	Future Date
DREG3831	100	47	0.009	Further Review	Test Scheduled	Future Date
0402-01	125.5	252	0.048	Further Review	Test Scheduled	Future Date
DF3233	100.3	107	0.020	Further Review	Previously Tested	11/19/86
N/A - Further Review Not Necessary						