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Sent: 8/16/2013 2:47:26 PM
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Subject: PSEP L-114 Pipe Replacement Project (Brentwood) - re-inspection of welds

Maria,

This email follows-up on questions posed at our August 5, 2013 meeting in Bishop Ranch where we reviewed weld re-inspection documentation and activities for the PSEP pipe replacement project on L-114 in Brentwood.

On March 26, 2013 at project site L-114 and as part of a routine unannounced job observation, a Non- Destructive Examination (NDE) inspector (PG&E employee) observed TC Inspection (TCI) performing Radiographic Testing (RT) in a manner not in compliance with API 1104, Section 11 (20th ed.) or their own method procedure. Specifically, the TCI two-man RT crew was producing double wall exposure/single wall viewing (DWE/SWV) radiographic images with a total of only two exposures and at exposure angles which exceeded the maximum exposure angle of 120 degrees. Please note that these inspection process failures were on new pipeline in construction, not in operation.

The PG&E NDE inspection activity noted above is part of an ongoing series of job observations of NDE vendors performing inspections across the PG&E system, and is being conducted by the NDE Services Group of PG&E's Applied Technology Services (ATS) Division as part of PG&E's Gas NDE Process Improvement Initiative, which commenced in 2012.

As a result of the observation findings, PG&E took immediate action to terminate all further TCI inspection activities on March 28, 2013. Through that date, TCI had completed the inspection of 173 welds on L-114, since the commencement of their inspections at the project site on February 18, 2013 (note: TCI inspected 9 welds on March 27, 2013 using a different TCI RT crew under the supervision of PG&E NDE inspectors. These weld inspections produced by TCI on March 27, 2013 were all completed in a code compliant manner). Weld inspection at the L-114 project site continued on March 28, 2013 with a WIX crew under PG&E NDE staff's supervision. PG&E has since removed TCI as a PG&E-approved NDE vendor.

As an immediate corrective action, PG&E has commenced re-inspection of all affected TCI-inspection at the L-114 project site and is in the process of completing analysis on this re-inspection information.

In addition, PG&E's Gas Operations has completed a detailed assessment of all RT work performed by TCI during 2012 through the termination of their services and has found additional work not in compliance with TCI's procedures or the API 1104 standard. PG&E is in the process of evaluating the radiographic images produced by TCI and developing a quality review plan for conducting redigs of some locations.

As stated above, PG&E's internal Quality Control process identified the contractor's RT non-compliance on L-114. L-114 is not in service, and the welds upon completion of re-examination will adhere to the requirements of all applicable codes and standards.

PG&E will be reaching out to SED shortly with more information on this issue as it is finalized, including our quality review plan for the additional noncompliant RT work performed by TCI that has been identified. In the meantime, please let me know if you need any further information.

Regards

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