

From: Malashenko, Elizaveta I.  
Sent: 9/20/2013 5:05:31 PM  
To: Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD); Eng, Terence (terence.eng@cpuc.ca.gov)  
Cc: Yura, Jane (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=JKY1); Redacted  
Redacted  
Bcc:  
Subject: RE: Responses to your Sept 6 questions

Thank you!

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***Elizaveta Malashenko***

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**From:** Doll, Laura [mailto:LRDD@pge.com]  
**Sent:** Thursday, September 19, 2013 4:45 PM  
**To:** Malashenko, Elizaveta I.; Eng, Terence  
**Cc:** Yura, Jane; Redacted  
**Subject:** Responses to your Sept 6 questions  
**Importance:** High

Liza

You may remember when Jane and I met with you on Friday September 6 (before the OSC hearings) you had some additional questions about our NDE inspection process and some of the events surrounding our decision to terminate the consulting services of TCI.

Here are answers to your questions as I wrote them down, and also attached is a copy of our technical specification for NDT. I understand that Terence is scheduled to meet with ATS on September 30. We're happy to discuss any of this further.

Laura

**QUESTION:**

**4263.01. What is our contractor certification process for NDE inspectors? Do we review their procedures?**

**RESPONSE:**

The attached PG&E specification ("PGE NDT Technical Specification\_CONF"), which incorporates the requirements of ANSI/ASNT CP-189, establishes minimum requirements for Contractors performing Non-Destructive Examination (NDE) services on PG&E Gas Operation assets. Section 3.0 of this specification addresses NDE qualification and certification.

**4263.02. What happened the day we identified the inadequate weld inspection activities? Specifically, was the weld passed that day? What did our supervisor do? Were the TCI contractors told to leave on the spot?**

**RESPONSE:**

On March 26, 2013, ATS noted that TCI was performing weld inspections that did not adhere to their procedures or to API 1104. The ATS NDE inspector, Redacted asked the TCI crew to re-examine the 2 exposed welds in the correct manner, under his supervision. The TCI crew performing non-compliant weld inspections was removed from the job site on March 26, 2013.

On March 27, 2013, a new TCI crew was allowed to continue work on R-134. March 27, 2013 was the last day that TCI performed inspections on R-134. In addition to removing TCI crews from project R-134, PG&E asked all TCI crews to cease working on any projects on 4-1-13, effective immediately.

**4263.03. How long do we keep weld x-rays?**

**RESPONSE:**

The images on radiography film degrade (darken) in a typical period of 3 to 10 years, or sooner depending on several factors including: film types, exposure to sunlight, development process, and storage conditions. PG&E typically keeps its film on hand for 5 years before recycling. However, the NDE reader sheet that shows the disposition of each film as interpreted by the qualified NDE Level II or III technician is kept for the life of the pipeline.

**4263.04. Why didn't we catch this sooner? Couldn't someone reviewing the work over the past several years have noticed that there were insufficient x-ray exposures in the file of completed work?**

**RESPONSE:**

Historically, PG&E has not performed field Quality Assurance/Quality Control (QA/QC) on 3rd party NDE service providers. The company performing the NDE inspection was responsible for reviewing the x-ray films and documenting the weld features (if applicable) and acceptance or failure on the reader sheet. In 2012, PG&E began performing field QA/QC examinations of these NDE activities. PG&E will continue to improve its QA/QC work to ensure all work is being completed in a safe and compliant manner, and to enhance public safety.

**4263.05. How are we going to check TCI work done before 2010?**

**RESPONSE:**

PG&E is in the process of determining if a review of these records is plausible. Note, however, all of the affected pipelines were strength tested to confirm the integrity of the pipelines.

**4263.06. What about other of our NDE contractors? Have we checked their work?**

**RESPONSE:**

PG&E performed QA/QC examinations of all other NDE contractors and verified that their crews were qualified to perform NDE work, and were performing these tasks in a manner that complies with their company procedures and with industry standards.

**4263.07. When can Terence meet with ATS and other appropriate staff to review what we have done since we discovered the issue?**

**RESPONSE:**

PG&E has scheduled a meeting with Terence and ATS on September 30, 2013.

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