

From: Yura, Jane
Sent: 10/14/2013 5:53:00 PM
To: Malashenko, Elizaveta I. (elizaveta.malashenko@cpuc.ca.gov)
Cc: Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD);
Robertson, Michael (michael.robertson@cpuc.ca.gov); Solis, Maria
(Maria.Solis@cpuc.ca.gov); Podoreanu, Alin (alin.podoreanu@cpuc.ca.gov);
Johnson, Kirk (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=MKJ2);
Kenny, Peter E. (/O=PG&E/OU=Corporate/cn=Recipients/cn=PXKZ); [Redacted]
[Redacted]
Bcc:
Subject: RE: Next Steps for L-114

Liza, I received an update from the construction team for the first set of questions, and we will continue to work through the process that you've outlined below, for SED approval of the line for tie-in this week, if all is found satisfactory.

Here is the information as of now:

(1) For the weld with the external undercut, can you summarize the final PG&E determination (what record was used; the measurements of the undercut; applicable criteria).

a. W-738 (External Undercut Indication)

i. All measurements were made using a v-wac gauge with a tolerance of 1/64".

ii. API 1104 20th Edition Section 9.7.2 was utilized for acceptance criteria.

iii. There were 5 areas of external undercut at the 6:00 o'clock position of the weld.

1. The **depth** for 4 out of the 5 undercut areas ranged from .020" to .025" deep x 1/4" to 1/2" long. These areas were found to be acceptable per API 1104 Section 9.7.2 (table 4).

2. 1 area of undercut was found to be approximately 0.045" deep x 3/8" long. This imperfection, was approximately 1/64" over allowable depth tolerance and found to be unacceptable by mechanical measurement. In a conservative effort, this weld was removed from the line and replaced with a new segment.

3. New hydro tested pipe was used as the replacement spool piece.
4. The new welds (TI-972R and TI-973) were visually inspected, radiographically tested and reviewed by PG&E RT Level III. Welds were found to be acceptable.

iv. For all 5 areas of undercut the combined **length** of undercut was less than 2" in a continuous 12" length of weld. Which would deem the weld acceptable per API 1104 Section 9.3.11 by radiography.

(2) For the 4 welds that were cutout and re-done, please summarize how the welds were validated (NDE method, NDE contractor & PG&E validation). In particular, I would like a confirmation that all X-rays were validated and signed off by a Level 3 X-ray specialist.

- a. W-760, W-770, W-771 and W-781 were removed from the system as directed by CPUC.
- b. New hydro tested pipe was used as the replacement spool pieces.
- c. All Radiographic Testing was performed by Western Industrial X-ray (WIX).
- d. PG&E RT Level III was onsite and reviewed radiographic images for acceptance to API 1104 Section 9.3 for final disposition of welds.
- e. Replacement welds were made and inspected as follows:

| No | Weld # (New & Old) | Visual Inspection | WIX RT Inspection | PG&E RT Level III | Comments |
|----|--------------------------------|-------------------|-------------------|------------------------|---|
| 1. | TI-970 – Replacement of W-781 | Accept | Accept | Accept (10/11/13) | |
| 2. | TI-971 – Replacement of W-781 | Accept | Accept | Accept (10/11/13) | |
| 3. | TI-972 – Replacement of W-738 | Accept | Rejected | Rejected (10/11/13) | |
| 4. | TI-972R - Replacement of W-738 | Accept | Accept | Accept (10/11/13) | |
| 5. | TI-973 – Replacement of W-738 | Accept | Accept | Accept (10/11/13) | |
| 6. | TI-974 – Replacement of W-770 | Accept | Rejected | Rejected (10/11/13) | Removed from system (10/14/13) – Replaced with TI-978. RT will be completed 10/14/13 |
| 7. | TI-975 – Replacement of W-771 | Accept | Rejected | Rejected (10/11/13) | Removed from system (10/14/13) – Replaced with TI-979. RT will be completed 10/14/13. |

| | | | | |
|------------------------------------|--------|-----|----------------------|---|
| 8. TI-976 – Replacement of W-760 | | | Accept (10/11/13) | |
| 9. TI-977 – Replacement of W-760 | Accept | | Accept (10/11/13) | |
| 10 TI-978 -- Replacement of TI-974 | TBD | TBD | TBD | – Replaced with TI-978. RT will be completed 10/14/13 in evening. |
| 11 TI-979 -- Replacement of TI-975 | TBD | TBD | TBD | Replaced with TI-979. RT will be completed 10/14/13 in evening. |

We will continue to respond to your inspector Alin for any additional information needed.

Thank you,

Jane

From: Yura, Jane
Sent: Monday, October 14, 2013 12:59 PM
To: 'Malashenko, Elizaveta I.'
Cc: Doll, Laura; Podoreanu, Alin; Solis, Maria; Robertson, Michael
Subject: RE: Next Steps for L-114

Liza, thank you. this is a very clear process, and we will be providing all the info requested,

Jane

From: Malashenko, Elizaveta I. [<mailto:elizaveta.malashenko@cpuc.ca.gov>]
Sent: Monday, October 14, 2013 12:55 PM
To: Yura, Jane
Cc: Doll, Laura; Podoreanu, Alin; Solis, Maria; Robertson, Michael
Subject: RE: Next Steps for L-114

Hi,

I just spoke with Alin, who is in the field performing the auditing work on L-114 for CPUC, and here is how I'd like to update my previous guidance:

- (1) Please provide the copy of the documents for the weld with the external undercut to Alin and walk him through why PG&E has determined the weld to be acceptable.
- (2) I understand that a Level 3 is signing off on all the welds that are being re-done. Please have the Level 3 available to Alin to ask any questions and provide the copies of documentation related to the welds to Alin. Specifically, Alin will need the copies of the reader sheets.
- (3) When performing the tie-in, please also have a Level 3 review and sign-off on all the tie-in welds. Also, please provide the copies of the reader sheets to Alin.
- (4) Please make any other information that Alin request available.

Here is how I see the approval process for putting L-114 in service.

- (1) After the final weld rework has been completed, I will wait for my team (Alin and others) to provide me with the technical findings.
- (2) Assuming that CPUC technical team finds the work on all 5 welds acceptable, I currently don't foresee a reason why the line would need to be kept out of service.
- (3) In addition to the 5 welds that are being re-validated, I'm also going to look for confirmation that the tie-in welds were all properly inspected and are acceptable.
- (4) Once PG&E has completed the work on the 5 welds that needed re-validation, PG&E can begin the tie-in work.
- (5) PG&E is not to put gas into the line until receiving a final approval from the CPUC.

Please let me know if you have any questions or if you anticipate any scheduling issues due to the steps laid out above.

Thanks,

Liza

Elizaveta Malashenko

Deputy Director

Office of Utility Safety and Reliability

Safety and Enforcement Division

California Public Utilities Commission

Phone: 415-703-2274

E-mail: elizaveta.malashenko@cpuc.ca.gov