

From: Malashenko, Elizaveta I.
Sent: 10/14/2013 12:55:23 PM
To: Yura, Jane (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=JKY1)
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)
Bcc:
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

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From: Yura, Jane [<mailto:JKY1@pge.com>]

Sent: Monday, October 14, 2013 12:04 PM

To: Malashenko, Elizaveta I.

Cc: Doll, Laura

Subject: RE: Next Steps for L-114

Liza, we are getting the additional information, and should have it to you by 2:00. Do you think there is a possibility that we could receive your approval today? If not, I will have the construction team proceed with rescheduling their preparations for tomorrow until the next available tie-in window.

Thank you,

Jane

From: Malashenko, Elizaveta I. [mailto:elizaveta.malashenko@cpuc.ca.gov]
Sent: Monday, October 14, 2013 11:00 AM
To: Yura, Jane
Cc: Doll, Laura; Hagan, Jack (Brigadier General – CA); [Redacted] Johnson, Kirk
Subject: RE: Next Steps for L-114

Jane,

I'm working with my staff to validate L-114 work to ensure that all welds can be cleared. A few additional questions:

- (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).
- (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.

Thank you,

Liza

Elizaveta Malashenko

Deputy Director

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From: Yura, Jane [mailto:JKY1@pge.com]
Sent: Friday, October 11, 2013 5:11 PM
To: Malashenko, Elizaveta I.
Cc: Doll, Laura; Hagan, Jack (Brigadier General – CA); [Redacted] Johnson, Kirk
Subject: RE: Next Steps for L-114

Liza,

As requested by your directive of October 4, 2013, PG&E has completed the production of records for item 1, and cutout all four welds for item 2. For Item 3, SED inspectors have been onsite during this week. For item 4, disposition of all cutouts, they have been documented and stored. And all records requested by PHMSA were provided last week.

We now request SED's approval to place Line 114 into service. If it is possible to obtain your approval by close of business Monday, we will be able to use the Contra Costa air permit we currently hold to vent the tie-in line on October 15 (Tuesday), and begin the work, which would be concluded by October 16 (Wednesday). If we are unable to get your approval on Monday, we will apply for a new permit, which will take a minimum of 10 days.

Please let me know how you would like us to proceed, and any additional information you may need from us.

Thank you,

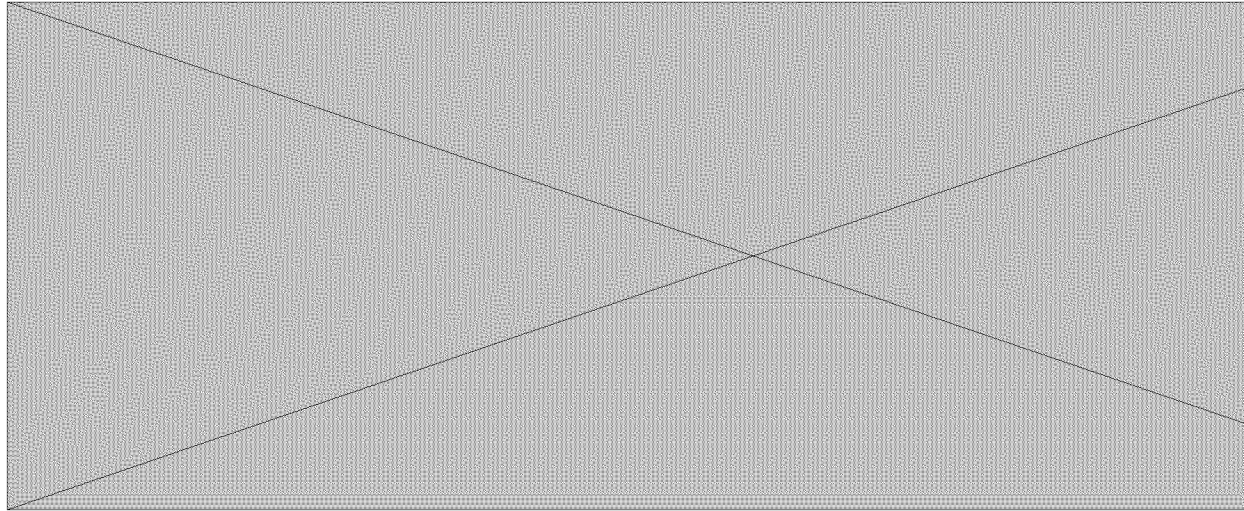
Jane

From: Yura, Jane
Sent: Tuesday, October 08, 2013 11:00 AM
To: 'Malashenko, Elizaveta I.'
Cc: Doll, Laura; 'Hagan, Jack (Brigadier General – CA)'; [Redacted] Johnson, Kirk
Subject: RE: Next Steps for L-114

Liza, in response to item 3 below, PG&E has developed the following schedule of work. Our contact person, [Redacted] can help coordinate any details for your inspectors. [Redacted] can be reached at [Redacted]
[Redacted]

Thank you,

Jane



From: Malashenko, Elizaveta I. [<mailto:elizaveta.malashenko@cpuc.ca.gov>]
Sent: Friday, October 04, 2013 11:46 AM
To: Yura, Jane
Cc: Doll, Laura; Hagan, Jack (Brigadier General – CA)
Subject: Next Steps for L-114

Jane,

I'm following up on the status of the Brentwood pipeline L-114. As you are aware, last week PHMSA reviewed the X-ray records associated with L-114 and found 5 welds with potential defects. After additional analysis, PHMSA concluded that all of the radiographs show defects that could compromise the integrity of the corresponding welds.

SED is directing PG&E to address this issue as follows before putting the L-114 back in service:

1. For the 1 weld that shows an external undercut on the X-rays, PG&E is

directed to perform the following:

- a. Produce a record that the external undercut on the identified weld was measured during construction and was found acceptable to the visible acceptance criteria in API 1104 Section 9.7.
 - b. If no record can be produced, PG&E is directed to dig-up the weld and measure the external undercut.
 - c. If the visible inspection indicated a defect per acceptance criteria in API 1104 Section 9.7, then PG&E must repair or remove the weld.
2. For the 4 welds that show an internal undercut on the X-rays, PG&E is directed to repair or cut out all of the four welds.
 3. PG&E should notify CPUC as soon as possible when this work will be performed, so that CPUC can make arrangements to have an inspector present.
 4. PG&E is directed to provide documentation to CPUC as to the disposition of the defects, complete with the NDE testing records. A copy of the documentation should also be provided to PHMSA.

PG&E is directed to not place the pipeline into service until all above items are complete and CPUC has determined that the safety concerns have been adequately addressed.

Please confirm receipt and let me know if you have any questions.

Sincerely,

Elizaveta Malashenko

Elizaveta Malashenko

Acting Deputy Director

Office of Utility Safety and Reliability

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