

PG&E Quality Assurance Program for Radiographic Inspections

11/15/13

I. Comprehensive Review and Corrective Action Plan

- A. Develop a comprehensive Final Report on the results of the Line 114 re-examination.
- B. With input from SED, retain a technically qualified third party to develop a comprehensive Extent of Condition Analysis and Re-Inspection & Remediation Plan.
 - i. The Extent of Condition Analysis will include a review of all NDE third-party contractors who have performed radiographic testing for PG&E's Pipeline Safety Enhancement Plan.
 - ii. The Extent of Condition Analysis will include key inspection parameters beyond those identified in Line 114.
 - iii. The pace of re-inspection and remediation will be risk-based and will include performing a system-wide leak analysis associated with prior girth welds.
 - iv. The plan will identify how the Integrity Management Program will incorporate threats and risks identified in the Extent of Condition Analysis.
 - iv. The Inspection Test Plan submitted to SED on September 23, 2013 has been initiated. That preliminary Inspection Plan will be superseded by the final comprehensive Extent of Condition Analysis and Re-Inspection & Remediation Plan referenced above.
- C. Conduct a feasibility analysis to evaluate the applicability of In-Line inspection assessments on girth welds.
- D. Provide monthly progress reports to SED beginning in December 2013.

II. Interim Safety Measures

Expand the transmission leak survey program and perform additional surveying of affected transmission lines to provide additional assurance that there are no safety threats associated with this noncompliance in the applicable areas.

III. NDE Program Enhancements

Provide a summary of NDE Program Enhancements to SED that includes assurance that future NDE testing work is performed in accordance with industry standards and in a manner compliant with applicable codes and regulations.

IV. Communications and Community Engagement

As of November 6, 2013, completed notification to local agency authorities in the cities and counties affected by the citation in accordance with Resolution ALJ-274 and provided explanation of the safety implications of noncompliant nondestructive testing.