Noncompliant Weld Inspection Techniques

Line 114 Non Destructive Examination Final Report

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Synopsis

As part of PG&E's Non Destructive Examination (NDE) Process Improvement Initiative, the NDE Services Group of PG&E's Applied Technology Services (ATS) Division was requested to perform job observations of NDE vendors performing inspections across the PG&E system. The NDE job observation administered by PG&E personnel commenced in the third quarter of 2012. During the performance of one of these unannounced job observations for a replacement project on Line 114, the PG&E NDE inspector observed TC Inspection (TCI) performing Radiographic Testing (RT) in a noncompliant manner to both the referenced code (American Petroleum Institute) API 1104, 20th edition¹ and their own method procedure (Attachment 1).

PG&E took immediate action which included terminating all work with TCI and conducting an in-depth review of all weld inspections completed by TCI from 2012-2013². PG&E reviewed 3755 welds and identified 488 welds as having noncompliant inspections. The findings relate to noncompliant weld inspection techniques and not the quality of the welding performed. PG&E has not identified any safety issues or issues with the integrity of any girth welds on the project and has no evidence of any safety issues with any other girth welds inspected by TCI.

Since 2012, PG&E has taken several measures to improve its NDE inspection processes, and continues to enhance this program. Additionally, PG&E is performing further analyses to evaluate the welds that were identified has having inadequate inspections. PG&E has selected a sampling of locations where we will conduct field verifications. Currently, this plan consists of excavating 43 welds. This preliminary plan is being further developed, and with input from SED, PG&E will retain a technically qualified third party to develop a comprehensive Extent of Condition Analysis and Re-Inspection & Remediation Plan.

Chronology

- Q3 of 2012 PG&E began a comprehensive review and assessment of its Quality Control (QC) measures related to NDE, and as a result significantly enhanced its NDE QC process.
- 3/26/13 As part of this enhanced QC program, PG&E discovered third-party contractor, TCI, performing non-compliant RT on a weld on a pipe replacement project (R-134) on transmission Line 114 near Brentwood. Data regarding PG&E's welding program and all analyses of Line 114 conducted to date indicate that the issue is TCI's noncompliant weld inspections; *not* the quality of the underlying welds. The original TCI crew completed inspections on 3/26/13 under the supervision of PG&E NDE staff. PG&E verbally informed the CPUC's third-party auditor, Bureau Veritas (BV), of the issue at the time of the initial identification. The pipeline section was not in service when the weld inspection issues were discovered.
- 3/27/13 A new TCI crew reported to site and performed code compliant inspections under the continued supervision of PG&E NDE staff. This was the last day TCI conducted inspections on L-114.

¹ API 1104, 20th Edition, Section 11.1.3., Exposure Geometry

² Extent of Condition Film Review of GAS Operations NDE Vendor, submitted to CPUC on September 25, 2013

- **3/28/13** TCI was replaced with a different NDE service provider, Western Industrial X-Ray (WIX), which performed work under PG&E supervision.
- 4/1/13 PG&E terminated TCI as a PG&E-approved NDE vendor, and issued a "stop all work" order to TCI.
- 4/1/13 PG&E requested PG&E's Sourcing Group to pull all orders and records of projects where TCI performed inspection work.
- **4/12/13** PG&E began working with a 3rd party consultant, Redacted , to validate Shaw Pipeline Services tethered Automated Ultrasonic Testing (AUT) system.
- **6/3/13** PG&E staff began communicating with the SED regarding the inadequate weld inspections on L-114.
- **7/19/13** PG&E's third party review validated the AUT system was an acceptable means of validating girth welds on L-114.
- **7/30/13** PG&E formally communicated the L-114 inadequate weld inspections in the PSEP Quarterly Report³.
- **8/1/13** PG&E conducted a tailboard meeting for the AUT re-inspection of L-114, and commenced re-inspection work.
- 8/14/13 The re-inspection of all 142 welds inspected in a non-compliant manner on L-114 was completed.
- **9/26/13** PG&E weld re-inspection work for L-114 was audited by PHMSA. PHMSA identified 5 questionable welds.
- **9/3013** Redacted issued formal report finding all 5 welds acceptable after review of radiographic images (Attachment 2).
- 10/11/13 PG&E removed the welds and reviewed the 5 welds for undercutting.
- **10/16/13** PG&E and Redacted validated that the 5 cut out welds did not show undercutting and were acceptable per API 1104.
- **10/16/13** PG&E provided data to the CPUC-SED to support request to return line to service.
- **10/17/13** CPUC-SED notified PG&E that there were no outstanding safety concerns and directed that L-114 could be placed in service.
- **10/19/13** L-114 was placed in service.

Results of Job Observation on L-114

On January 7, 2013, PG&E commenced work on the PSEP pipe replacement work for L-114. This would tie in approximately 3.71 miles of 24-inch steel main to L-114 at MP 12.68 and MP 16.54, and replace the existing 22-inch and 24-inch steel pipe, in the City of Brentwood. The welding process for L-114 started on January 9, 2013. The RT Contractor, Western Industrial X-Ray (WIX) began performing

³ PSEP Q2 Quarterly Compliance Report, submitted to CPUC on July 30, 2013

radiographic examinations on January 9, 2013. TCI was brought in to complete the RT inspections on L-114, and commenced inspection on February 19, 2013 through to March 28, 2013. TCI inspected a total of 173 welds on L-114.

On March 26, 2013, during the job observation, the PG&E NDE inspector noted the TCI two man RT crew 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 code allowable maximum exposure angle of 120 degrees. This inspection method does not satisfy requirements in the API 1104 20th edition code for a minimum of three exposures separated by 120 degrees and violated TCI RT procedure requirements.

The job observation performed for L-114 revealed several additional areas of non-compliance:

- Film densities outside the acceptable ranges⁴
- Non-Compliant placement of Image Quality Indicators⁵
- Improper film processing techniques
- Missing Weld identification Marker

Upon discovery, PG&E asked TCI to complete inspecting the remaining 2 welds under PG&E's supervision. A new TCI crew arrived on site on March 27, 2013 and completed inspections of 9 welds under the supervision of PG&E. This was the last day that TCI would perform RT inspections on L-114. By March 28, 2013, 310 total welds had been inspected on L-114, of which 173 were inspected by TCI. On April 1, 2013, PG&E terminated TCI as a PG&E-approved NDE vendor, and issued an order to TCI to stop all work. WIX returned to the job site for L-114 and completed all remaining radiographic examinations on this project.

PG&E worked with Redacted a third party NDE consultant, to review WIX's personnel qualifications, and NDE procedures to ensure adherence to all applicable codes and standards. Additionally, PG&E's NDE personnel were on site for the remaining RT inspections performed by WIX to oversee the inspections, and reviewing all films (Attachment 3).

Corrective Actions

In response to PG&E's discovery of code non-compliant Radiographic inspection of Line 114 girth welds, re-inspection was performed using API 1104 code compliant Radiography on 41 welds and Automated Ultrasonic Testing (AUT) on 101 welds⁶. PG&E worked with Redacted , a third party NDE consultant, to verify the inspection capabilities and code adherence of Shaw Pipeline Services tethered AUT system for PG&E's intended use for the evaluation of girth welds from the inside of line pipe.

PG&E contacted Shaw Pipeline Services, located in Houston, Texas, to identify a tool that could perform compliant UT examinations from the inside of the pipe rather than the conventional approach of

⁴ API 1104, 20th Edition, Section 11.1.10.1, Film Density

⁵ API 1104, 20th Edition, Section 11.1.6.1, Film

⁶ 9 re-inspections were not required as the welds were removed as part of locating the insertion points for the AUT tool, 11 inspections of welds were completed by TCI under the direct supervision of PG&E NDE staff and are considered compliant, 2 re-inspections were not required as the welds were previously removed from the pipe due to issues unrelated to TCI inspections, and 9 re-inspections were not required as the inspections by TCI on 8" pipe and are considered compliant.

performing UT from the outer surface of the pipe. UT is an acceptable method for NDE inspection specified by API 1104 20th edition.

To ensure the new inspection method adhered to API 1104 20th edition requirements, PG&E requested that Shaw Pipeline Services provide the following items for qualification of the tool:

- a) Create a detailed procedure that captures all of the requirements of API 1104 11.4.2
- b) Procedure and method shall be developed by an NDE Level III certified in ultrasonic testing
- c) Procedure shall be approved by an NDE Level III
- d) Demonstrate the procedure prior to final written approval
- e) Provide a procedure demonstration report

Shaw Pipeline Services provided a procedure for performing an internal Automated Ultrasonic Testing⁷ inspection to demonstrate the effectiveness of the tool and procedure, PG&E shipped test samples, which were embedded with defects to the Shaw facilities in Houston. To qualify the AUT tool, a test was performed and witnessed at Shaw's facilities in Houston, TX on July 8, 2013. The testing and inspection was observed by Redacted On July 19, 2013, Redacted determined that the AUT system was capable of detecting the type of defect or imperfection, discriminating between defects and imperfections, and locating the indication within the girth weld.

Results of Re-Inspection

Of the 142 welds re-inspected, PG&E identified 6 welds with potential imperfections or defects (Attachment 4). Four of these welds were re-inspected with AUT by Shaw Pipeline Services and identified as having linear fusion indications. RT identification of linear fusion indications is dependent on the orientation of the indication in relation to the radiation beam, and therefore, is not always detected. PG&E removed these welds as a precautionary measure. Once removed, the 4 welds were re-inspected using RT and found no linear indications.

Three welds, which were re-inspected with RT by WIX, also showed indications of weld imperfections. Weld 162 showed undercut like indication, which is defined as a groove melted into the parent material and left unfilled by weld metal. Weld 162 also displayed an unrelated AUT indication. Out of abundance of caution this weld was removed from the system and replaced. Upon removal, weld 162 was reinspected in ATS's lab, where it was determined that the undercut like indication was a shadowing effect that appeared in the film due to the geometry of the weld and not actually undercut. This is typical for cases where a high low condition exists. The final two weld films showed a potential burn-through, which occurs when excessive penetration causes a weld puddle to be blown into the pipe. At the time of field inspection, the burn-through indications were interpreted as porosity by WIX in the weld material. Out of an abundance of caution, the indications were repaired in the field and inspected using RT. The RT found these welds to be acceptable to API 1104, 20th edition. The table below summarizes the findings and mitigation.

⁷ SHAW AUT Tool Qualification Report, submitted to the CPUC on September 26, 2013

Weld #	NDE Performed	Findings	Mitigation
162	AUT/RT	Linear fusion indication(AUT)/Potential Undercut (RT)	Removed
237	AUT	Linear fusion indications not found in original RT performed by TCI.	Removed
259	AUT	Linear fusion indications not found in original RT performed by TCI.	Removed
262	AUT	Linear fusion indications not found in original RT performed by TCI.	Removed
270	RT	Potential burn through.	Repaired
311	RT	Potential burn through.	Repaired

Table 1: Summary of Re-Inspection on Line 114

Subsequently, a PHMSA regulatory audit was performed on September 25, 2013 to review the results of the re-inspection work. PHMSA identified 5 welds that they believed to have unacceptable undercut (UC) indications in discrete locations, summarized below Redacted the WIX RT Supervisor, and PG&E personnel did not interpret the indications as undercut. On October 4, 2013, the SED requested PG&E to repair or remove the 5 questionable welds.

No.	Weld No.	Regulatory - Level III Interpretation	Location In View
1	W-738	External Undercut (EUC)	36-42
2	W-760	Internal Undercut (IUC)	24-27
3	W-770	Internal Undercut (IUC)	36-42
4	W-771	Internal Undercut (IUC)	12-24
5	W-781	Internal Undercut (IUC)	44-49

Table 2: Summary of Welds with Potential Undercut Interpretation on Line 114

The five welds were removed on October 11, 2013. A review of the Radiographic & Visual inspection data was conducted by PG&E, who found the weld inspections to be acceptable. PG&E also requested Redacted review and interpret the data. These results were compared against the requirements for undercut in section 9.3.11, and section 9.7 of API 1104 20th edition, and found all five welds to be acceptable (Attachment 5).

Conclusion

There are no additional activities for L-114. The welds on L-114 were re-inspected via Radiography and Automated Ultrasonic Testing in accordance with the provisions of API 1104, 20th edition. On October 17, 2013, the SED communicated to PG&E that for L-114 they did not have any outstanding safety concerns, and this pipeline could be placed back into service. L-114 was placed into service on October 19, 2013.

PG&E will continue to openly communicate with the SED as the broader Extent of Condition plan develops. PG&E is committed to our overall goal of becoming the safest and most reliable gas operator in America. PG&E continues to take measures to ensure the safe operation of our facilities, and the safety of the public.

Attachments

Attachment 1

TCI NDE Procedure

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	Doc. # TC-RT-1104	Revision 2

RADIOGRAPHIC EXAMINATION OF WELDS

(Reference: API-1104)

TC-RT-1104

PREPARED BY:	Redacted	
TITLE:	LEVEL III	
SIGNATURE:	Redacted	
SIGNATORE: 7		

APPROVED BY:	Redacted	
TITLE:	President, T.C. Inspection	٦
SIGNATURE: 🟒		
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REVISION PAGE

MARCH 13, 2009	PG. 8 & 9 – 6.6.1; 6.6.2
MARCH 13, 2009	PG. 10-6.6.3.2; 6.6.3.3
JULY 10, 2009	PG. 5- 3.1
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<u>6.8.2</u>	
JULY 10, 2009	PG, 12- 6.13.2

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- 1.0 SCOPE
- 1.1 This procedure covers the general requirements for radiographic examination of weld as may be required by the client's specifications and by various codes under which a component or system is being designed and manufactured.
- 1.2 This document meets the minimum requirements of API-1104 and any other code or specification referencing the methods for radiographic examination as defined by API-1104.
- 2.0 GENERAL
- 2.1 The radiographic examination method is a nondestructive examination method. It consists of producing a shadow picture of the test part on radiographic film by passing penetrating radiation though the test part and on to the film. The amount of radiation transmitted through the part and onto the film is dependent on the source of radiation and the material densities and thicknesses through which radiation passes. The denser the material, the less radiation will pass through it and the film will be lighter. The less dense the material, the more radiation will pass through and the film will be darker.
- 2.2 Discontinuities appear on the film as either darker or lighter areas with regard to the density of acceptable test metal as shown on the film.
- 2.2.1 A darker area on the film indicates a discontinuity less dense than the test metal. Such discontinuities include, but are not limited to voids, slag inclusions, cracks, lack of fusion, lack of penetration and undercut.
- 2.2.2 A lighter area on the film indicates a discontinuity more dense than the test metal. Such discontinuities include, but are not limited to tungsten and copper inclusions.
- 2.3 In order to perform radiographic examination of welds to this procedure, it may be necessary for the client to provide the following information.
- 2.3.1 Identity of the welds to be tested. This information should include the project or contract designation, the component or piecemark, the weld joint with respect to location on the component or piece and the site.
- 2.3.2 Designate the extent of testing. This shall include the stage of the welding process during which the examination is to be performed. This will include whether complete or spot examination is to be performed.

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- 2.3.2.1 Complete examination shall mean 100% coverage of the designated weld and the heat affected zone for the entire length of the weld.
- 2.3.2.2 When spot examination is designated, the number, location and size of spots will be clearly specified by the client. Spot examination shall mean 100% coverage of designated weld and heat affected zones for the length of the spot.
- 2.3.3 The welding procedure including weld joint configuration with respect to fusion areas, root areas, thicknesses of metal, type of joint, types of material joined and the welding process.
- 2.3.4 The acceptance standards to be used.
- 2.3.5 When applicable, the marking system required.

3.0 REFERENCES

3.1 The following documents, of the issue in effect as called out on the purchase order or contract, have been referenced in the preparation of this procedure and are considered a part of this procedure as applicable.

American Petroleum Institute (API)API-1104 (20th Edition)Standard for Welding Pipelines and Related Facilities

 American Society for Testing and Materials (ASTM)

 E 94
 Recommend Practice for Radiographic Testing

E 142 Controlling Quality of Radiographic Testing

American Society of Nondestructive Testing (ASNT) SNT-TC-1A Nondestructive Testing Personnel Qualification and Certification

TC Inspection Company Qualification and Certification of NDE Personnel, Radiation Safety Manual

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4.0 PERSONNEL

- 4.1 Personnel performing radiographic examination to this procedure shall be qualified and certified in accordance with TC Inspection's Quality Assurance Manual. (Note: SNT-TC-1A, Sup. A, has been used as a guide in preparation of this procedure.
- 4.2 Only certified Level II or Level III personnel shall interpret test results to determine acceptability.

5.0 EQUIPMENT

- 5.1 Source of Radiation Either X-Ray or Gamma-Ray radiation may be used. The radiation source and technique used shall be proven satisfactory by demonstration of penetrameter resolution on the minimum thickness of the material radiographed. For X-ray machines operating over 320 kV and less, the focal spot size shall be determined by the pinhole method. For IR-192 sources, the focal spot size shall be determined by the manufactures assembly records as indicated on the source decay chart.
- 5.2 <u>Film</u> Radiographs shall be made using film equal to or finer grained that type 2 of Recommended Practice ASTM E-94.
- 5.3 <u>Screens</u> Lead intensifying screens shall be used and shall be in direct contact with the film. These screens shall be free from dirt, scratches, wrinkles, pits and oxide coating. Chemically coated (Fluorescent) intensifying screens shall not be used.
- 5.4 <u>Densitometers</u> capable of reading film H & D densities from 1.3 to 4.0, shall be used. Density strips, calibrated and traceable to national standards, shall be used.
- 5.5 <u>Film Holders</u> Shall be light tight, and shall be free of sand, dirt or other foreign particles.
- 5.6 <u>Lead Identification Markers</u> Shall be a minimum of 1/4" high and 1/16" deep in size and in quantities necessary.
- 5.7 <u>Penetrameters</u> Shall comply with the design requirements of either ASTM E 747 or ISO 1027 wire IQI. IQI material shall be radiographically similar to the item under examination.
- 5.8 Developing Equipment Either hand tanks or and automatic processor may be used.

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- 5.9 <u>Viewing Equipment</u> Film viewers shall be of the high intensity type with a variable intensity control. They shall produce sufficient illumination to view the maximum film density as required. The viewer shall have provision to prevent light from around the edge of the radiograph or light from lower density portions from interfering with interpretation.
- 5.10 Penetrameter Shims Wire IQI shall be used only
- 6.0 PROCESS
- 6.1 All radiography shall be performed in accordance with the safety requirements of the Radiation Safety Manual (O E & P).
- 6.2 <u>Time of Examination</u> Unless otherwise required, final radiography may be made of welds prior to final heat-treatment or stress-relived condition. If repair welds are made after final heat-treatment, then the weld shall receive the prescribed heat treatment and only the repaired area and heat affected zones need to be re-radiographed.
- 6.3 <u>Surface Preparation</u> Weld ripples or weld surface irregularities on both the inside (where accessible) and outside shall be removed to such a degree, by the client, so that irregularities cannot mask or be confused with the image of any discontinuity. The finished surface may be flush with the base material or have a uniform crown.
- 6.4 <u>Film Identification</u> The job number, weld joint or seam and the manufacturer's identification symbol or name shall be plainly and permanently indicated on each film. If space does not permit, such information shall be supplied in writing with each radiograph.

Welds that cover all of a radiograph may utilize only a control number to minimize the chance of masking defects. The control number will be traceable to the radiographic report containing all pertinent information required. Radiographs of repair welds shall be identified by an "R" for repair, R2, R3, etc., if more than one (1) repair.

- 6.5 Location Markers
- 6.5.1 Lead location markers or number belts shall be placed on the object being radiographed and not on the film or film holder and in such a manner that complete coverage and

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overlapped film areas are fully identified and the relationship between the film and the object is firmly established.

- 6.5.2 A starting point shall be selected for each weld being radiographed. The direction of numbering or location markers shall be permanently identified by a low stress stamped or etched arrow adjacent to the weld.
- 6.5.3 When permanent stamping or etching is prohibited or impractical, temporary marking shall be made on the surfaces of the component or part. This marking shall be maintained until it has been established that the area under examination is satisfactory. In this case, an accurate sketch of all temporary markings will be made to establish identity with the component or part and the radiograph.
- 6.5.4 <u>Location Markers for Piping</u> For pipe diameters up to and including 3.5 inches I.D., location view markers or number belts may be used. For pipe diameters over 3.5 inches O.D., a minimum of two (2) location markers shall appear on each film.
- 6.5.5 <u>Location Markers for Other Components</u> Location markers shall be placed on the part being radiographed so that at least two markers appear on each radiograph.
- 6.6 <u>Penetrameters</u>

Penetrameter shall be a wire type IQI only

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	hickness of Pipe Versu	TABLE Diameter of AST	Sector Sector Sector	rameter
Pipe Wall or W			Essential Wire Dian	
Inches	Millimeters	Inches	Millimeters	ASTM Set Letters
0-0.250	0-6.4	0.008	0.20	A
>0.250-0.375	>6.4-9.5	0.010	0.25	A or B
>0.375-0.500	>9.5-12.7	0.013	0.33	В
>0.500-0.750	>12.7-19.1	0.016	0.41	В
>0.750-1.000	>19.1-25.4	0.020	0.51	В
>1.000-2.000	>25.4-50.8	0.025	0.64	B

6.6.2 <u>Penetrameter Sensitivity</u> - Radiography shall be performed with a technique of sufficient sensitivity to display the identifying numbers and letters, and the specified wire, all of which are essential indications of the image quality of the radiograph.

6.6.3 Placement of Penetrameters

- 6.6.3.1 The penetrameter shall be placed adjacent to the weld seam in instances except in instances where the weld metal is not radiographically similar to the base material or the geometric configuration makes it impractical, in which case, the penetrameter may be placed over the weld metal. Penetrameters shall be placed perpendicular to the radiation beam where possible.
- 6.6.3.2 Where inaccessibility prevents placing the penetrameter on the source side, a film side penetrameter shall be placed on the film side of the joint, and a lead letter "F" at least as high as the identification numbers shall be placed adjacent to the penetrameter. When configuration or size prevents placing the penetrameter on the object being radiographed, it may be placed on a separate block as provided in ASTM E-1025.
- 6.6.3.3 Wire type penetrameters: The number and location of wire type penetrameters shall be the same as described for the hole type penetrameters except that the wires shall be placed across the weld and perpendicular to the weld length.

6.6.4 Number of Penetrameters

6.6.4.1 For welds radiographed with a multiple exposure technique, a penetrameter shall be located within one inch of the end of the film length which is to be interpreted and the other diametrically opposite the source. When a multiple exposure procedure is used

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and the film length to be interpreted is 5 in. or less one penetrameter shall be located on the film side diametrically opposite the source.

- 6.6.4.2 When a complete girth weld is radiographed in a single exposure using a source on the inside of the pipe (panoramic technique), four penetrameters equally spaced around the circumference shall be used.
- 6.6.5 Shims Under Penetrameters Wire IQI will only be used.

6.7 Film Placement

- 6.7.1 Each film shall be placed on the surface to be radiographed in a secure manner so that there is minimum gap between the surface of interest and the film. Where films are overlapped, the image of at least the last reference marker on each end of the film shall be appear on the appropriate adjacent films so as to establish that no part of the weld has been omitted.
- 6.7.2 The number and types of film in a film holder for each radiograph shall consist of one or more, the same or different types.
- 6.8 Source-to-Film Distances
- 6.8.1 The characteristics that shall govern the minimum source-to-film distance are: Physical size of the radiation source, geometric unsharpness and material thickness.
- 6.8.2 The minimum distance between the source or focal spot and the source side of the object being radiographed is determined by the formula:

$$D = \underline{St}_k$$

Where S is the effective source or focal spot size; t is thickness of weld including reinforcement plus distance between film side of weld and film. When determining t for SWE/SWV and DWE/SWV procedures, use single wall thickness and its weld reinforcement, for DWE/DWV procedure use OD of weld; that is OD of pipe plus twice the average height of the weld crown. Normally, K is 0.02 in. for 2 in. and thinner

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material but final acceptance of each radiograph should be based on the ability to see the prescribed penetrameter image and the specified wire.

6.9 Guide for Selection of Energy of Radiation (non-mandatory)

6.9.1 <u>X-Radiation</u> - Table 2 defines the recommended minimum thickness for which radioactive isotopes should be used. Compliance with Table 2 is not mandatory.

TABLE 2

Minimum Thickness			
Material	Iridium 192	Cobalt 60	
Steel	0.250 in.	1.50 in.	
Copper or High Nickel	0.200 in.	1.30 in.	
Aluminum	2.000 in.		

- 6.10 <u>Radiographic Technique for Parts, Components and Butt Welds in Tubular Products,</u> Nozzles, Valves, Flanges and Similarly Shaped Cylindrical Objects
- 6.10.1 <u>Single Wall Exposure / Single Wall View (SWE / SWV)</u> When a radiographic source con be centered within a butt weld, one exposure is adequate for the radiographic inspection of the complete weld. See Fig. 3 - A
- 6.10.2 Double Wall Exposure / Single Wall View (DWE / SWV) When the radiographic source is outside but not more than 1/2 in. from the weld surface, at least three exposures separated by 120 degrees shall be made for the radiographic inspection of a complete weld. See Fig. 3 - D
- 6.10.2.1 <u>Double Wall Exposure / Single Wall View (DWE / SWV)</u> When the radiographic source is outside and more than 1/2 in. from the weld surface at least four exposures separated by 90 degrees shall be made for the radiographic inspection of a complete weld. See Fig. 3 - C
- 6.10.3 Double Wall Exposure / Double Wall View (DWE / DWV) When the diameter of the piping containing the weld is 3.5 in. or less, a double wall exposure-double wall viewing procedure may be used. When this procedure is used and the radiation beam is offset so that the source side and film side portions of the weld do not overlap in the areas of the radiograph being evaluated, then at least two exposures

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separated by 90 degrees shall be made for the radiographic inspection of a complete weld. When the source side and film side portions of the weld are superimposed, at least three exposures separated by 60 degrees shall be made for the radiographic inspection of a complete degrees shall be made for the radiographic inspection of a complete weld. See Fig. 3 - F, E.

- 6.10.4 <u>When radiographing smaller diameter, thicker wall pipe</u>, additional exposures should be made to minimize the distortion of discontinuity images at the ends of the radiographs.
- 6.11 Film Storage
- 6.11.1 All unexposed films shall be stored in a clean, dry place where the surrounding conditions will not detrimentally affect the emulsion. If there is any question regarding the condition of the unexposed film, sheets from the front and back of each original role shall be processed in the normal manner without exposure to light or radiation. If this processed film shows fog, the entire box or roll from which the test film was removed shall be discarded, unless additional test films prove that the remaining film in the box or roll is free from pre-exposure fog exceeding 0.30 H & D transmitted density for transparent-based film or 0.05 H & D reflected density for opaque based film.
- 6.12 <u>Film Processing</u> All film shall be processed in accordance with Part III of ASTM E 94.
- 6.13 Quality of Radiographs
- 6.13.1 All films shall be free from processing or other defects which would interfere with proper interpretation of the radiograph.
- 6.13.2 <u>Penetrameter Sensitivity</u> Radiography shall be performed with a technique of sufficient sensitivity to display the identifying numbers and letters, and the essential wire.
- 6.13.3 <u>Film Density</u> The film density through the area of interest of the radiograph image shall be 1.8 minimum for single viewing and 2.0 minimum for composite viewing of double film exposure and 4.0 maximum for either case. Each radiograph of a composite set shall have a minimum density of 1.0. Composite viewing must be approved by the client.

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- 6.13.4 If the penetrameter image does not show on one radiograph in double film technique but does show in composite viewing, interpretation shall be permitted only by double film viewing. Composite viewing must be approved by the client.
- 6.13.5 All films rejected on the basis of the above listed defects shall be discarded and the area of interest shall be radiographed again unless the subject areas are interpretable on a second film.

6.14 Radiographic Technique Qualification

- 6.14.1 For each diameter and wall thickness of pipe to be radiographed in production, the radiographic technique shall be qualified. Technique qualifications shall be submitted to the client for approval.
- 6.14.2 The following information must be indicated on the Radiographic Technique:
 - a) Pipe size (diameter)
 - b) Wall Thickness
 - c) Radiation Source (x-ray, cobalt, iridium, etc.) and strength of KVP
 - d) Type and Thickness of Intensifying Screens (front and back)
 - e) Filters or Masks Used, if any
 - f) Geometric Relationship (source focal spot size, focal film distance, object to film distance, radiation angle with respect to weld and film)
 - g) Film (type and brand, length and width)
 - h) Exposure Time (in milliampere-minutes, millicurie-minutes or curie-minutes)
 - i) Processing (time-temperature for development, stop bath or rinse, fixation, washing and drying)
- 6.15 Interpretation of Radiographs

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	Radiographic Exan (Reference: API-11	
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6.15.1 An interpretation of the radiographs in accordance with the applicable acceptance standard in part 8.0 shall be provided to the client.

7.0 <u>REPORTS</u>

7.1 A radiographic report shall be prepared and furnished to the client. A standard radiographic report form will be used unless otherwise requested by the client.

7.2 The report, as a minimum, shall contain the following:

- a) Name of the company and the radiographic technician, level of certification, the contract number and the date of exposure.
- b) Weld Identification.
- c) Film interpretation noting unacceptable discontinuities and their location.
- d) Details of radiographic technique.
- 7.3 The final radiographs shall be submitted to the client for evaluation and acceptance. The client shall review the interpretation of all radiographs and shall have the final authority and responsibility for acceptance or rejection. The final radiographs will be submitted to the client for appropriate storage.
- 7.4 The required number of report copies will be furnished to the client. A minimum of one report copy will be kept on file at the TC Inspection Company facility.

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8.0 ACCEPTANCE STANDARD

8.1 Indications shall be evaluated to the requirements of Tables 3 and 4 and the Note to Tables 3 and 4.

TABLE 3			
Discontinuity	Maximum Single Indication Length (Inches)	Total Indication In Any 12" Length (Inches)	
INADEQUATE PENETRATION (Without High-Low)	1.0	1.0	
INADEQUATE PENETRATION DUE TO HIGH-LOW	2.0	3.0	
INCOMPLETE FUSION (at Root or Top of Joint)	1.0	1.0	
INCOMPLETE FUSION DUE TO COLD LAP	2.0	2.0	
BURN THROUGH (Pipe 2 3/8" O.D. and Larger)	1/4 in. and the density of the BT's image exceeds that of the thinnest adjacent base metal	1/2	
BURN THROUGH (Pipe Less than 2 3/8" O.D.)	1/4 in. and the density of the BT's image exceeds that of the thinnest adjacent base metal	N/A	
ELONGATED SLAG INCLUSIONS (Pipe 2 3/8" O.D. and Larger)	2.0 and 1/16 wide	2.0	
ELONGATED SLAG INCLUSIONS (Pipe Less than 2 3/8" O.D.)	3 times the thinner wall thickness and width exceeding 1/16 in. length	when exceeding 8% of the weld	

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HOLLOW BEAD (Porosity)		2.0						

TABLE 4

ACCEPTANCE STANDARDS DISCONTINUITY Maximum dimension of 1/8 inch or 25% of Porosity, Spherical and Piping pipe wall thickness whichever is less. (wormhole and spherical) Distribution shall not exceed that shown in Figures 7 and 8. Cluster diameter shall not exceed 1/2 inch.with Porosity, Clusters in Finish Pass Only. individual pores not to exceed 1/16 inch. Total length in any continuous 12 inch length of weld shall not exceed 1/2 inch. The maximum width of any isolated slag Isolated Slag Inclusions Pipe 2 3/8" inclusions shall not exceed 1/8 inch. The total O.D. and Larger length of isolated slag inclusions in any continuous 12 inch length of weld exceeds 1/2 inch, nor shall there be more than four isolated slag inclusions of the maximum width of 1/8 inch in 12 inches. The maximum width of any isolated slag Isolated Slag Inclusions Pipe Less than 2 3/8 inch O.D. inclusion shall not exceed 1/2 the nominal wall thickness and the total length of such inclusions shall not exceed twice the nominal wall thickness. The maximum length shall not exceed 5/32 Crater Cracks or Star Cracks inch. None Allowed. Other Cracks Up to 2 inches in a continuous 12 inch weld Undercutting length, or 1/6 the weld length, whichever is smaller.

Note following is for Tables 3 and 4.

NOTE: Excluding high-low condition, any accumulation of discontinuities having a total length of more than 2 inches in a continuous weld length of 12 inches or more than 8 percent of a continuous weld length if the total weld length is less than 12 inches is unacceptable. Any accumulation of discontinuities that total more than 8 percent of the weld length associated with an entire joint is unacceptable.

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Parallel slag lines shall be considered as separate conditions if the width of either of them exceeds 1/32 inch. Individual hollow bead discontinuities, each exceeding 1/4 inch in length, shall be separated by at least 2 inches.

Attachment 2

3rd Party Review of Undercut Notation



Phone: (281) 389-4304 E-mail: NDTServices@aol.com

September 30, 2013

Mr.^{Redacted} Pacific Gas and Electric Company PG&E Applied Technology Services 3400 Crow Canyon Road San Ramon, CA 94583

Dear Steve:

As requested, on Monday, September 30, 2013, as an independent NDT Level III consultant I performed a film review of five welds associated with PG&E Line 114, Job Number 41878790. The following are the results of this review:

- Weld #738
 - Noted indication at location markers 36 39
 - Indication interpreted to be EU length 1 1/16"
 - Weld acceptable in accordance with API 1104
- Weld #760
 - Noted indication at location markers 23 27
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition
 - Weld acceptable in accordance with API 1104
- Weld #770
 - Noted indication at location markers 39 42
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition – length 2 3/8"
 - Weld acceptable in accordance with API 1104
- Weld # 771
 - Noted indication at location markers 12 24
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition – length 11"
 - Weld acceptable in accordance with API 1104

- Weld # 781
 - Noted indication at location markers 46 49
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition – length 4"
 - Weld acceptable in accordance with API 1104

Let me know should you require any additional information concerning this film review.

Respectfully,

Redacted

President ASNT Level III – 2820 ACCP Professional Level III

DLC/pac/Letter Concerning Film Review of Five Welds from PG&E Line 114

cc: Redacted

Peter Kenny

Attachment 3

PG&E Gas Department Contractor NDE Observations L-114 Brentwood, CA



Applied Technology Services NDE Services Group 3400 Crow Canyon Rd San Ramon, CA. 94583

PG&E GAS DEPARTMENT CONTRACTOR NDE OBSERVATIONS L-114 BRENTWOOD, CA

ATS Report Number: # 413.61-13-429

ATS Report # 413.61-13-429 Report Revision # 0 Copyright by Pacific Gas & Electric Company All rights reserved PG&E Confidential 11/18/13



Scope of work

PG&E Gas Operations requested PG&E's Applied Technology Services (ATS) group to conduct NDE job observations at the project site L-114 in Brentwood CA. This effort is part of the overall Gas NDE Process Improvement initiative for the PG&E NDE Services Program.

Observation Activities

This report details the NDE activities observed between the dates of March 26, 2013 to May 1, 2013.

There were two NDE vendors observed during this time:

- TC Inspections Inc. (TCI)
- Western Industrial X-Ray (WIX) of Fairfield, CA

Field Observation Plan

PG&E ATS Job observations detail all relevant findings on the following topics:

- Safety (both Industrial Safety and Radiation Safety)
- Procedure use and Adherence for all NDE methods witnessed
- Radiographic Film interpretation (when Radiography is performed)
- Code Compliance
- Overall workmanship of NDE activities and document review

Results

Specific Daily job observation reports have been attached along with this report.

Summary of Results

TC Inspections Inc. (TCI)

These notes are a summary of the field observations performed on this vendor at L-114 on 3/26/13.

- Radiation safety signage was taped to cones and in need of maintenance/replacement.
- Both technicians held RT level II qualification.
- Crew did not perform the inspection per their procedures.
- RT vendor ready for RT when it became available
- The RT film was out of code compliance.
- Crew did not follow the code requirements for RT
- Housekeeping was unsatisfactory
- Crew was not carrying the required shipping papers for source transport.
- RT crew was cooperating with the audit process.

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TC Inspections Inc. (TCI)

These notes are a summary of the field observations performed on this vendor at L-114 on 3/27/13.

- Radiation safety no deficiencies found. Established an adequate boundary for inspection.
- Both NDE Technicians held RT level II qualification.
- No deficiencies in regard to procedure use.
- RT vendor was ready for RT when it became available
- Housekeeping was satisfactory.
- Crew was not carrying the required shipping papers for source transport.
- RT crew was cooperating with the audit process.

Western Industrial X-Ray (WIX)

Observations:

These notes are a summary of multiple job observations performed on this vendor at L-114 (March 29, 2013 thru May 1, 2013).

- Radiation safety and site safety was fully implemented with no findings.
- NDE technicians were qualified for the work they were performing.
- Crew was familiar with and followed method procedures.
- RT vendor ready for RT when it became available.
- The RT film interpretation was accurate.
- Crew was following the code requirements for RT.
- Housekeeping within their darkroom was good.
- All their required documentation was available.
- RT crew was cooperating with the audit process.

Location of Audit		Bre	ntwood		Mile Poir	nt N/A
Pipe diameter and thickness	Diameter		24		Thickness 0.375"	_
Date of Audit	0	3 26 201	13			
Company performing NDT				1	C Inspection	
Technician/s Name/s			Rec	acted		
Certification Level	RT MT	Norman Norman Norman Norman	_		RT MT	_
Procedures & Equipment						
Procedure used	RT MT		104 Rev 0 N/A	(To API	1104, 19th Ed)	
Procedure available	RT MT		Yes Yes	Х	No No	Outdated Procedure was available and used
RT Technique	DWSI	Х	SWSI			
Radiation type	lr 192			Se 75	X Ray	
Source or Focal spot physical size		0.142"			Activity or Kv	75.7
Geometric Unsharpness (Ug)		0.0034'	8		Exposure time	2:45
Surface NDT method		None				
Power source	Port. Gene	erator	Х		Welding set	Onboard Inverter

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<u>Variables</u>

Film used	Manufact	urer	A	lgfa	_	Speed D	5	
Screens	Туре	P	b	Thickness	0.005" /	0.005"	Condition _	Bad
Process method	Manual	>	K	-	Automatic		CR	
Process chemistry condition	New		Aged	3 Wks	Re	plenished	Bad	
Process time	Minutes	4:	00	-	Pro	cess Temperature F°	Unkn	own
Darkroom	Clean	Х	. Ne	eed Cleaning		Surfaces		
Safelight conditions	Good	Х	Cracked		Broken	Not workin	g -	
Film Viewer	Туре	Sch	neeman	Elect.	_	All bulbs working	γ	
Bulbs	Photofloo	d	γ	-	100W		60W_	
Rheostat	Working	γ		I	Foot switch		Working	
Suitable for film density	Yes	γ	. No		_			
Densitometer	Yes	γ	No		Туре	X-Rite 331 S	/N 04137	79
Calibrated	Yes		No	Х	Date	Not Calibrated		
Daily check	Yes	Х	. No		By	JS		

Technician did not possess a densitometer film strip nor calibration certificate. He was limited to performing the "zero" check by nullifying the machine.

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IQI	Туре	1 ASTM B	Wire required	0.016"	_	Number Required	8
Density of Film	Weld	1.63-:	2.20	Parei	nt Material	1.90-2.36	
Number of IQI's	:	1	2 <u>X</u>	- 3		4	
Sensitivity	Required	0.016"		Achieved	0.013"		
Artifacts or Process Marks	Yes	Y		No			
Interpretation	Ву	Redacted		_	Level 📗		
Interpretation accurate	Yes	Υ		No	·		
Report	Complete	ed Y	Required In	nformation		In-Process	
<u>Surface NDT</u> Method							
Magnetizing Method							
Equipment Calibrated							
Lift test weight				N/A			
Test weight weight							
Dry Powder							
Wet method							
Particulate content checked							

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Radiation Safety

CA License / Letter of Reciprocity	Not A	_				
Operating & Emergency Procedures	TC-RSF		2001 Revision (Poss Outdated)			
Dosimetry worn	Technician	Υ	Assi	stant	γ	
IRRSP or State card available	Technician	Redacted	Assi	stant	None	-
Source Information	Exp Device / Moc	lel INC II	۶-100	S/N	4702	
	Capsule Model	87703		S/N	85843B	-
General Notes	Dimensions	0.118" Dia X 0.079" H X	0.142" Diag	Leak Test	No LT Cer	t Available

Code Compliance

Improper Technique used: Radiographed DWE/SWV in a manner of two exposures. Ref API-1104 11.1.3.1 requires a min of 3 exposures spaced 120° apart.

Outside of prescribed densities: Film had densities as low as 1.63. Ref API 1104 11.1.10.1 requires a min of 1.8 (max of 4.0)

Weld Identification missing: ID was partially "cut-off" on some images. Ref API 1104 11.1.8

Penetrameter set letter / designation missing: Two views. Ref API 1104 11.1.5

General Presentation: Processing artifacts, blurry images. Ref API 1104 11.1.1

Possessed limited radioisotope documentation - Potential Haz-Mat transportation issues: (Leak Test Cert, Depleted Uranium Cert,

Source cert on TC letterhead, not the MFR's letterhead.)

Procedure Binder was not updated: Table of Contents declared TC-RT-1104-2 Rev 1, however Rev 0 (19th Ed) was used.

Technicians not in possession of the vendor's Operating and Emergency Procedure

Densitometer was not calibrated nor able to verify against a certified film strip.

Technician processed film at 4:00, unknown temperature. Should process 5:00 at 68°F.

Safety Compliance

RT Technician was not wearing proper PPE: long-sleeved shirt and safety glasses. He was actively preparing the set-up when I coached him. Returned to work with the proper PPE.

Radiation signage taped to cones are in need of maintenance / replacement. (Items appeared as worn.)

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General Notes (Continued)

Environmental

Temporarily blocked street traffic while the exposures were taken to minimize dose to the General Public. (Good Catch)

Best Practices / Recommendations

Connected the guide tube and drive cables to the exposure device on the tailgate of the vehicle and then crossed traffic to the work location. Technician did not establish a RT boundary when he connected the equipment.

Technicians set the exposure device on ground level and used guide tube extensions to deliver the source to location. (Good use of equipment.)

Dismantled the drive cables and guide tubes from the exposure device at the work location prior to removing Radiation Area postings.

Comments

Coached the technicians on the RT Technique. Re-radiographed the weld to the proper technique. Missed approx 2 Inches of coverage on the 2nd set of film. Technicians shot a 3rd series to account for the missing 2 inches of missing coverage.

Coached the technicians after the Work Observation was complete all items declared in this report.

Technician became very defensive and argumentative during the work observation process and began refusal to cooperate.

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Location of Audit	L-114-2				Mile Point 12.70-16.52		
Pipe diameter and thickness	Diameter	24			Thickness 0.375"	_	
Date of Audit	03	03 27 2013					
Company performing NDT				av	TC Inspection		
Technician/s Name/s			Redacted				
Certification Level	RT MT	8	Nov-15 Nov-15		RT MT	Jul-14 Oct-13	
Procedures & Equipment	_					_	
Procedure used	RT <u>T</u> MT		104-2 Rev /A	1 (API :	1104 20th Ed)		
Procedure available	RT MT		Yes Yes	X X	No No	_	
RT Technique	DWSI	Х	SWSI				
Radiation type	lr 192			Se 75	X Ray		
Source or Focal spot physical size		0.142			Activity or Kv	74.7	
Geometric Unsharpness (Ug)		0.003"			Exposure time	3:45	
Surface NDT method		N/A					
Power source	Port. Gener	ator	Х		Welding set	Onboard Inverter	

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<u>Variables</u>

Film used	Manufact	urer	Agfa 3 1/2" X 17"		-	Speed D	5
Screens	Туре	F	b	Thickness	0.005" /	0.010"	Condition OK
Process method	Manual		Х		Automatic _		CR
Process chemistry condition	New		Aged	~1Wk	- Rep	olenished	Bad
Process time	Minutes	0	:00		Proc	ess Temperature F°	68° (Verified)
Darkroom	Clean	Х	Ne	ed Cleaning		Surfaces	
Safelight conditions	Good	Х	Cracked		Broken	Not worki	ng
Film Viewer	Туре		Venture	8	_	All bulbs working	γ
Bulbs	Photofloo	d	Х		100W_		60W
Rheostat	Working	Х	_	F	oot switch _		Working
Suitable for film density	Yes	Х	No		-		
Densitometer	Yes	Х	No		Type_	Optel	J2716
Calibrated	Yes		- No	Х	Date	No Cal Cert.	
Daily check	Yes	Х	No		By	T.P.	

Technician declared he uses a film density strip to perform his daily check. The density strip was clean, certified, and 1 week old. Strip Expiration: 3 month of use.

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IQI	Type 1 ASTM B	Wire required 0.016 "	Number Required	8
Density of Film	Weld 2.84	Parent Material 3.01		
Number of IQI's	1	2 <u>X</u> 3	4	
Sensitivity	Required 0.016"	Achieved 0.013		
Artifacts or Process Marks	Yes	No <u>X</u>		
Interpretation	By	Lev	vel II	
Interpretation accurate	Yes X	No		
Report	Completed X	Required Information	In-Process	
Surface NDT				
Method				
Magnetizing Method				
Equipment Calibrated				
Lift test weight		N/A		
Test weight				
Dry Powder				
Wet method				
Particulate content checked				

Radiation Safety

CA License / Letter of Reciprocity	Redacted			
Operating & Emergency Procedures	TC-RSP-1 Rev 3	(10/25/2007)		
Dosimetry worn	Technician	Υ	Assistant	γ
IRRSP or State card available	Technician	dacted	Assistant	Redacted
Source Information	Exp Device / Mode	INC IR-1	100 S/N	7018
	Capsule Model	87703		85846B
<u>General Notes</u>	Dimensions	0.118" X 0.079" X 0.142"	Diag Leak Test	No Documentation
Code Compliance				
Radiation Safety: No Deficiencies Found				
Film Development: No Deficiencies Four	nd			
Film Interpretation: No Deficiencies Fou	ind			

Radiosotope Shipping (Haz-Mat): Technicians did not possess isotope leak test cert, depleted Uranium Certification, Decay Chart on TC Inspection Company Letterhead, not on OEM Letterhead as a certificate.

Safety Compliance

Used short orange cones with signs to establish the RT boundary. Recommended use of tall yellow / magenta cones.

General Notes (Continued) Environmental Established a very good RT boundary. No deficiencies found

Best Practices / Recommendations

.

Only recommendation was to consult Radiation Safety Officer regarding transportation of hazardous material training / testing IAW 49 CFR Sec 172.704 for verification that they are trained and why the missing documentation at the job site is not with the source paperwork.

Location of Audit	L-114	-2 Redacted	, Bren	twood	Mile Point			
Pipe diameter and thickness	Diameter	24"			Thickness 0.375"	_		
Date of Audit	3	/28/2013						
Company performing NDT			W	Vestern Industrial X-Ray (WIX)				
Technician/s Name/s		Redacted						
Certification Level	RT MT	II RT Assistant MT						
Procedures & Equipment								
Procedure used	RT MT	WIX-RT-6 (F	Ref API	-1104, 2	Oth Ed; Effective 08	/06/12)		
Procedure available	RT MT		Yes Yes	Y	No No	-		
RT Technique	DWSI	Υ	SWSI					
Radiation type	lr 192		9	Se 75	X Ray			
Source or Focal spot physical size		0.116"			Activity or Kv	44 Ci		
Geometric Unsharpness (Ug)	0.003"				Exposure time	4:50		
Surface NDT method		N/A						
Power source	Port. Gene	rator			Welding set	Onboard Inverter Y		

<u>Variables</u>

Film used	Manufact	turer	/	Agfa	_ s	peed D	5	
Screens	Туре		Pb	Thickness	0.005" /	0.010"	Condition	ОК
Process method	Manual		γ	_	Automatic		CR	
Process chemistry condition	New		Aged	~2Wks	_ Rep	lenished	Bad	
Process time	Minutes	C):00	_	Proc	ess Temperature F°	68	3
Darkroom	Clean	Y	N	leed Cleaning		Surfaces		
Safelight conditions	Good	γ	Cracked		Broken	Not worki	ng _	
Film Viewer	Туре		Ventur	е	_	All bulbs working	γ	
Bulbs	Photofloo	bd	γ	_	100W		60W	
Rheostat	Working	γ	_	I	Foot switch	N/A	Working	
Suitable for film density	Yes	γ	Nc	·	_			
Densitometer	Yes	γ	Nc	o	Туре	X-Rite	e 331	
Calibrated	Yes	γ	Nc		Date	/lissing Sticker, but wa	as calibrated	
Daily check	Yes	γ	No	D	Ву	Redacted]	

IQI	Туре	1 ASTM B	- Wire required	0.016"	Γ	Number Required	8
Density of Film	Weld	2.27	Parent Materia	2.45			
Number of IQI's		1	2 <u>X</u>	3		4	_
Sensitivity	Required	0.016"	-	Achieved 0	.010"		
Artifacts or Process Marks	Yes		-	No X			
Interpretation	Ву	Re	dacted	_	Level III		
Interpretation accurate	Yes	γ	_	No			
Report	Complete	ed	Required Ir	nformation		In-Process	Υ
<u>Surface NDT</u> Method							
Magnetizing Method							
Equipment Calibrated							
Lift test weight				N/A			
Test weight weight							
Dry Powder							
Wet method							
Particulate content checked							

Radiation Safety

CA License / Letter of Reciprocity	CA License Redact	ed			
Operating & Emergency Procedures	NCT-4424-48 A	EOP-1999			
Dosimetry worn	Technician	Yes A	ssistant	Yes	
IRRSP or State card available	Technician	A	ssistant	Redacted	
Source Information	Exp Device / Model	T/O 660B	S/N	B3200	
	Capsule Model	INC 7	S/N	T651	
<u>General Notes</u>	Dimensions	0.106" X 0.048" X 0.116"	Leak Tes	t 2/21/2013	

Code Compliance

No Issues

Safety Compliance

No Issues.

Crew utilized both RT Cones and "Banner-Guard" Wide RT Ribbon to establish the Radiation Area. ++

General Notes (Continued)

Environmental No Issues

.

Best Practices / Recommendations

No Recommendations. (Currently working on the Yellow Cones)

Location of Audit	Line 114	-2 Redacted	Brentv	vood		Mile Point	N/A	
Pipe diameter and thickness	Diameter	24"			Thickness	0.375"		
Date of Observation	4/2/2013				Observer	Redacted		
Company performing NDT			WIX ((Western Industrial X-Ray)				
Technician/s Name/s	Reda	cted						
Certification Level / Expiration	RT MT		900000		RT MT	Α	ssistant	
Procedures & Equipment								
Procedure used	RT MT	WIX-RT	-6	IAW IAW	REF AP	1-1104, 20th	Edition Effective 08-06-	2012
Procedure available	RT MT		Yes Yes	YES	No			
RT Technique	DWSI	YES	SWSI					
Radiation type	lr 192	YES		Se 75			X Ray	
Source or Focal spot physical size	().116"			Act	tivity or Kv	42ci	
Geometric Unsharpness (Ug)	().0024			Ехро	osure time	5:45	
Surface NDT method		N/A						
Power source	Port.	Port. Generator AS BACKUP		Welding set			Onboard Inverter	YES

<u>Variables</u>

Film used	Manufacture	er		\GFA		Speed)5
Screens	Туре		РВ	Thickness	0.005F /	0.0108	Condition OK
Process method	Manual		YES	_	Automatic		CR
Process chemistry condition	New	YES	Aged		Rej	olenished	Bad
Process time	Minutes	6	6:00	_	Proc	cess Temperature F°	69°
Darkroom	Clean	YES	N	leed Cleanin	g	Surfaces	
Safelight conditions	Good	YES	Cracked		Broken	Not work	ing
Film Viewer	Туре	VENT	TURE 87-0	C1 (M/N)	_	All bulbs working	YES
Bulbs	Photoflood		YES	_	100W_		60W
Rheostat	Working	YES	_		Foot switch	V/A	Working
Suitable for film density	Yes	YES	No	o	_		
Densitometer	Yes	YES	N	o	Туре	X-RI	re 331
Calibrated	Yes	YES	No	o	Date	Missing Sticker, I	But was Calibrated
Daily check	Yes	YES	No	0	By	Redacted	
Film Density Strip Available	Yes	YES	No	D			

IQI	Туре	1 ASTM B	Wire required	0.016"	-	Number Re	equired	8
IQI Placement	Within 1" from Left Extremity	YES	Center	YES	Within 1'	' from Right Extremity	YES	
Density of Film	Weld	2.71	Parent Material	2.91	-			
Number of IQI's		1	2	- 3	YES	4		
Sensitivity	Required	0.016 WIRE		Achieved	YES			
Artifacts or Process Marks	Yes			No	YES			
Interpretation	Ву	Redacted		_	Level			
Interpretation accurate	Yes	YES		No				
Report	Completed		Required In	formation		In-Proce	ess -	YES

Radiation Safety

CA License / Letter of Reciprocity	California Lice	nse	R	ev	48	
Operating & Emergency Procedures	NCT-4424-48	AEOP-1999	R	ev	N/A	
10 CFR 19, 20, 34, 49, CCR Title 17	YE	S	_			
Shipping Documentation	YE	S				
MSDS for Radioactive Material	YE	S				
DOT Regulations	YE	S				
Dosimetry worn	Technician	YES	Assistant		YES	
IRRSP or State card available	Technician	Redacted	Assistant		Redacted	
	Туре	RA	Туре		RA	
	Expires	12/16	Expires		12/16	
	Certification #	Redacted	Certification #		Redacted	
Source Information	Exp Device / Model	т/о	660B S	/N	B3200	
	Capsule Model	INC 7	S	/N	T651	
	Dimensions	0.106" X 0.048" X	X 0.116" L	eak Te	sted	2/21/2013
	Dep. Uranium Cert	YES				
	OEM Decay Chart	YES				
Boundary Dose rate - maximum dose ra	ate found 0	mr/hr Withir	n legal limits	Yes	YES	No

General Notes

Code Compliance

Crew is following all applicable codes and regulations.

Safety Compliance

Safety looks good. Crew has all proper PPE and keeps work area clean.

Environmental

No Environmental issues.

Best Practices / Recommendations

Recommend the crew bring up the Radiation Boundary area at the tomorrow mornings safety tailboard meeting. The work site is congested with traffic from equipment and people. Want to make sure everyone at the jobsite is aware of the Radiation Boundary's and what is expected from them when the boundary's are up.

Location of Audit	L-114	-2 Redacted	Bren	twood	Mile Point	·			
Pipe diameter and thickness	Diameter	24"			Thickness 0.375"	-			
Date of Audit	3	/29/2013							
Company performing NDT	Western Industrial X-Ray (WIX)								
Technician/s Name/s			Redacte	d					
Certification Level	RT MT	11			RT <u>Assistant</u> MT	-			
Procedures & Equipment									
Procedure used	RT MT	WIX-RT-6 (I	Ref API	-1104, 2	Oth Ed; Effective 08	/06/12)			
Procedure available	RT		Yes	γ	No	-			
	MT		Yes -		No	-			
RT Technique	DWSI _	γ	SWSI						
Radiation type	lr 192		:	Se 75	X Ray				
Source or Focal spot physical size		0.116"			Activity or Kv	44 Ci			
Geometric Unsharpness (Ug)		0.003"			Exposure time	5:15			
Surface NDT method		N/A							
Power source	Port. Gene	rator			Welding set	Onboard Inverter	(

<u>Variables</u>

Film used	Manufacture	er	Agfa	Speed	1 E	05
Screens	Туре	Pb	Thickness	0.005" / 0.01	LO''	Condition OK
Process method	Manual	γ	_	Automatic		CR
Process chemistry condition	New	Aged	~2Wks	Replenis	shed	Bad
Process time	Minutes	0:00	_	Process 7	Gemperature F	68
Darkroom	Clean Y	۱	Need Cleanin	ng	Surfaces	3
Safelight conditions	Good Y	Cracked		Broken	Not work	ing
Film Viewer	Туре	Venture 87-0	C1 (M/N)	AI	l bulbs working	Y
Bulbs	Photoflood	Υ	_	100W		60W
Rheostat	Working Y	1		Foot switch N/A		Working
Suitable for film density	Yes Y	/N	o	_		
Densitometer	Yes Y	/N	o	Туре	X-Rit	te 331
Calibrated	Yes Y	N	0	Date Missi	ng Sticker, but w	- /as calibrated
Daily check	Yes Y	/N	o	By Red	acted	_

IQI	Туре	1 ASTM	В	Wire required	0.016"	_	Number Required	8
Density of Film	Weld	2	.6	Parent Materia	2.8	3		
Number of IQI's	:	1		2 <u>X</u>	_	3	4	_
Sensitivity	Required	0.016'	88		Achievec	0.010"		
Artifacts or Process Marks	Yes				No	Х		
Interpretation	Ву		Redacted		_	Level III		
Interpretation accurate	Yes	γ			N	o		
Report	Complete	ed		Required Ir	nformatior	۱	In-Process	Υ
<u>Surface NDT</u> Method								
Magnetizing Method								
Equipment Calibrated								
Lift test weight					N/A			
Test weight weight								
Dry Powder								
Wet method								
Particulate content checked								

Radiation Safety

CA License / Letter of Reciprocity	CA License Redacto	ed		
Operating & Emergency Procedures	NCT-4424-48 A	EOP-1999		
Dosimetry worn	Technician	Yes	Assistant	Yes
IRRSP or State card available	Technician	acted	Assistant	Redacted
Source Information	Exp Device / Model	T/O 660B	S/N	B3200
	Capsule Model	INC 7		T651
<u>General Notes</u>	Dimensions	0.106" X 0.048" X 0.116	Eeak Tes	t 2/21/2013
Cada Camplianaa				

Code Compliance No Issues

Safety Compliance

No Issues.

Crew utilized both RT Cones and "Banner-Guard" Wide RT Ribbon to establish the Radiation Area. ++

General Notes (Continued) Environmental No Issues

Best Practices / Recommendations

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(Currently working on the Yellow Cones)

Newer Darkroom: Lots of new LED lighting within the darkroom. (LED Ambient lighting and LED Safelights for film processing.)

Location of Audit	Line 114-2	Redacted	Brent	wood	<u>Mi</u>	ile Point N	I/A	
Pipe diameter and thickness	Diameter	24"			Thickness 0	.375"		
Date of Observation	4/3	3/2013			Observer	Redacted	1	
Company performing NDT			WIX	(Wester	n Industrial	X-Ray)		
Technician/s Name/s	Redact	ed	9.					
Certification Level / Expiration	RT		Responses		RT	A	ssistant	
	MT				MT			
Procedures & Equipment								
Procedure used	RT _	WIX-RT-	·6	IAW	REF API-1	.104, 20th E	Edition Effective 08-06	5-2012
	MT _			IAW				
Procedure available	RT		Yes_	YES	No			
	MT		Yes_		No			
RT Technique	DWSI _	YES	SWSI		-			
Radiation type	lr 192 <u>Y</u>	′ES		Se 75			X Ray	
Source or Focal spot physical size	0	.116"			Activi	ity or Kv	42ci	
Geometric Unsharpness (Ug)	0	.0024			Exposu	ure time	5:45	
Surface NDT method		N/A						
Power source	Port. G	enerator AS B	ACKUP	V	Velding set		Onboard Inverter	YES

<u>Variables</u>

Film used	Manufacture	er	A	GFA		Speed)5
Screens	Туре		РВ	Thickness	0.005F /	0.010B	Condition OK
Process method	Manual		YES	_	Automatic		CR
Process chemistry condition	New	YES	Aged		Rep	olenished	Bad
Process time	Minutes		5:30	_	Proc	ess Temperature F	69°
Darkroom	Clean	YES	N	leed Cleanin	g	Surfaces	
Safelight conditions	Good	YES	Cracked		Broken	Not work	ing
Film Viewer	Туре	VEN	TURE 87-(C1 (M/N)	_	All bulbs working	YES
Bulbs	Photoflood		YES	_	100W_		60W
Rheostat	Working	YES	_		Foot switch	N/A	Working
Suitable for film density	Yes	YES	No)	_		
Densitometer	Yes	YES	No)	Туре	X-RI	FE 331
Calibrated	Yes	YES	No)	Date	Missing Sticker, I	3ut was Calibrated
Daily check	Yes	YES	No)	By	Redacted	
Film Density Strip Available	Yes	YES	No)			

IQI	Туре	1 ASTM B	1 ASTM B Wire required 0.016"			Number Required		
IQI Placement	Within 1" from Left Extremity	YES	Center	YES	Within 1	" from Right Extremity	YES	
Density of Film	Weld	2.6	Parent Material	2.89	_			
Number of IQI's	:	1	2	- 3	YES	4		
Sensitivity	Required	0.016 WIRE		Achieved	YES			
Artifacts or Process Marks	Yes			No	YES			
Interpretation	Ву	Redacted		-	Level	8000000		
Interpretation accurate	Yes	YES		No				
Report	Completed		Required In	formation		In-Proc	ess	YES

Radiation Safety

CA License / Letter of Reciprocity	California Lice	enseRedacted	_	Rev	48	
Operating & Emergency Procedures	NCT-4424-48	AEOP-1999		Rev	N/A	
10 CFR 19, 20, 34, 49, CCR Title 17	YE	S	_			
Shipping Documentation	YE	S				
MSDS for Radioactive Material	YE	S				
DOT Regulations	YE	S				
Dosimetry worn	Technician	YES	Assistant		YES	
IRRSP or State card available	Technician	Redacted	Assistan	t	Redacted	
	Туре	RA	Type		RA	,
	Expires	12/16	 Expires		12/16	ŝ
	Certification #	Redacted	Certification #		Redacted	d
Source Information	Exp Device / Model	T/O	660B	S/N	B3200	D
	Capsule Model	INC 7		S/N	T651	
	Dimensions	0.106" X 0.048"	X 0.116"	Leak Tes	ted	2/21/2013
	Dep. Uranium Cert	YES		-		
	OEM Decay Chart	YES		-		
Boundary Dose rate - maximum dose r	ate found 0	mr/hr Within	n legal limits	Yes	YES	No

General Notes

Code Compliance

Good Knowledge of the Code and Requirments, Referencess the code when reading film. Good Practice ++

Safety Compliance

Redacted spoke about the radiation boundarys at this morinings safety tailboard and expressed the importance of being aware of the boundary and saying away from the boundary while the radiograpy is being performed.

Environmental

No Environmental issues.

Best Practices / Recommendations

No recommendations were needed.

Location of Audit	Line	2 114-2	Redacted	, Brentv	vood	<u>N</u>	<u> /ile Point</u>	V/A	
Pipe diameter and thickness	Diam	eter_	24"			Thickness ().375"		
Date of Observation		4/4	/2013			Observer	Redacted	1	
Company performing NDT				WIX	Westerr	n Industria	IX-Ray)		
Technician/s Name/s		Redact	ed						
Certification Level / Expiration	RT			2006000		RT _	A	ssistant	
	MT					MT _			
Procedures & Equipment									
Procedure used	RT	_	WIX-RT	-6	IAW .	REF API	-1104, 20th	Edition Effective 08-06-	2012
	MT	_			IAW .				
Procedure available	RT			Yes_	YES	No_			
	MT			Yes_		No_			
RT Technique	D	WSI _	YES	SWSI					
Radiation type	Ir	192 <u>Y</u>	ES		Se 75			X Ray	
Source or Focal spot physical size		0.	116"			Acti	vity or Kv	40ci	
Geometric Unsharpness (Ug)		0.	0024			Expos	sure time	6:00	
Surface NDT method		Second	N/A						
Power source	F	Port. G	enerator <u>As</u>	BACKUP	W	elding set		Onboard Inverter	YES

<u>Variables</u>

Film used	Manufacture	er	Α	GFA		Speed)5
Screens	Туре	P	в	Thickness	0.005F /	0.0108	Condition OK
Process method	Manual	Y	ES	_	Automatic		CR
Process chemistry condition	New	YES	Aged	2 Days old	Rep	olenished	Bad
Process time	Minutes	5:	30	_	Proc	cess Temperature F	69°
Darkroom	Clean	YES	. N	eed Cleanin	g	Surfaces	3
Safelight conditions	Good	YES	Cracked		Broken	Not work	ing
Film Viewer	Туре	VENT	URE 87-C	:1 (M/N)	_	All bulbs working	YES
Bulbs	Photoflood		YES	_	100W_		60W
Rheostat	Working	YES	_		Foot switch	N/A	Working
Suitable for film density	Yes	YES	. No		_		
Densitometer	Yes	YES	No		Туре	X-RI	FE 331
Calibrated	Yes	YES	No		Date	Missing Sticker, I	But was Calibrated
Daily check	Yes	YES	No		By	Redacted	
Film Density Strip Available	Yes	YES	No		_		

IQI	Туре	1 ASTM B	Wire required	0.016"	_	Number R	equired	8
IQI Placement	Within 1" from Left Extremity	YES	Center	YES	Within 1'	' from Right Extremity	YES	
Density of Film	Weld	2.2	Parent Material	2.57	_			
Number of IQI's	:	1	2	3	YES	4		
Sensitivity	Required	0.016 WIRE		Achieved	YES			
Artifacts or Process Marks	Yes			No	YES			
Interpretation	Ву	Redacted		_	Level			
Interpretation accurate	Yes	YES		No				
Report	Completed		Required In	formation		In-Proce	ess	YES

Radiation Safety

CA License / Letter of Reciprocity	California Lice	enseRedacted		Rev	49	
Operating & Emergency Procedures	NCT-4424-48		Rev	2		
10 CFR 19, 20, 34, 49, CCR Title 17	YE					
Shipping Documentation	YE					
MSDS for Radioactive Material	YE					
DOT Regulations	YE					
Dosimetry worn	Technician	Assi	stant	YES		
IRRSP or State card available	Technician Redacted		Assistan	Assistant		
	Туре RA		Туре		RA	
	Expires 12/16		Expires		12/16	
	Certification #	Redacted	Certifica	tion #	Redacted	
Source Information	Exp Device / Model	т/	O 660B	S/N	B3200	
	Capsule Model	INC 7	1		T651	
	Dimensions	0.106" X 0.048	" X 0.116"	Leak Teste	d	2/21/2013
	Dep. Uranium Cert	YES		-		
	OEM Decay Chart	YES				
Boundary Dose rate - maximum dose r	ate found 0	mr/hr With	nin legal limits	Yes YE	S	No

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General Notes



Safety Compliance No Safety issuse found today.

Environmental

No Environmental issues.

Best Practices / Recommendations

Note the crew seamed to be more aware of the RT boundarys today.

Location of Audit	L-114	edacted . Bren	wood	<u>Mile Point</u>				
Pipe diameter and thickness	Diameter _	24"	_	Thickness 0.375				
Date of Observation	4/5	5/2013	_	Observer	Redacted			
Company performing NDT		N	.I.X (Weste	Western Industrial X-Ray)				
Technician/s Name/s	Red	Redacted						
Certification Level / Expiration	RT			– RT				
	MT			MT				
Procedures & Equipment								
Procedure used	RT	WIX-RT-6	IAW	Ref API 1104 20th I	Edition, Effective 08/06/2012			
	MT		IAW					
Procedure available	RT	Ye	s <u>X</u>	No				
	MT	Ye	s	No				
RT Technique	DWSI _	X SW	SI	_				
Radiation type	lr 192 <u>X</u>		Se 7	5	X Ray			
Source or Focal spot physical size	0.116		_	Activity or Kv	41			
Geometric Unsharpness (Ug)	0	.0024	_	Exposure time	6:00			
Surface NDT method		N/A	_					
Power source	Port. G	enerator Backup		Welding set	Onboard Inverter X			

<u>Variables</u>

Film used	Manufacture	er -	Α	GFA		Speed I	05
Screens	Туре	Lead	(Pb)	Thickness	0.005/	0.010	Condition Good
Process method	Manual	X	(_	Automatic		CR
Process chemistry condition	New	Х	Aged	3 Days	Re	plenished	Bad
Process time	Minutes	5.3	30	_	Pro	cess Temperature F	69.5
Darkroom	Clean	Х	N	eed Cleanin	g	Surfaces	Very Clean
Safelight conditions	Good	Х	Cracked		Broken	Not work	ing
Film Viewer	Туре	Ventur	e (87-C1)	S/N 9739		All bulbs working	xX
Bulbs	Photoflood	-	Х	_	100W		60W
Rheostat	Working	Х			Foot switch		Working
Suitable for film density	Yes	Х	No				
Densitometer	Yes	Х	No		Туре	Χ-	Rite
Calibrated	Yes	Х	No	l	Date	Missing Sticker, But	calibrated
Daily check	Yes	Х	No	·	By	Redacted	
Film Density Strip Available	Yes	Х	No				

IQI	Type 1 AST	M B Wire required	0.016	Number Require	d <u>8</u>
IQI Placement	Within 1" from Left Extremity	Center	X	Within 1" from Right Extremity	X.
Density of Film	Weld 2	2.45 Parent Material	2.6		
Number of IQI's	1	2 <u>X</u>	3	4	_
Sensitivity	Required 0 .	016	Achieved X		
Artifacts or Process Marks	Yes		No X		
Interpretation	By	edacted		Level II	
Interpretation accurate	Yes X		No		
Report	Completed	Required In	formation	In-Process	Х

Radiation Safety

CA License / Letter of Reciprocity	Redacte	d	Rev	49
Operating & Emergency Procedures	NCT-4424-48	8 AEOP-1999	Rev	2
10 CFR 19, 20, 34, 49, CCR Title 17	Ye	es		
Shipping Documentation	Y	es	_	
MSDS for Radioactive Material	Y	es		
DOT Regulations	Y	es		
Dosimetry worn	Technician	Yes	Assistant	Yes
IRRSP or State card available	Technician Type	Redacted	Assistant Type	Redacted
	Expires Certification #	16-Dec Redacted	Expires Certification #	Redacted
Source Information	Exp Device / Model Capsule Model	Tech O	PS 660B S/N S/N	B3200 T651
	Dimensions	0.106" x 0.048" >	x 0.116" Leak Te	sted 2/21/2013
	Dep. Uranium Cert	Yes		
	OEM Decay Chart	Yes		
Boundary Doserate - maximum dosera	te found <u>10</u>	_mr/hr Withir	n legal limits Ye	s <u>X No</u>

General Notes

Code Compliance

Yes

Safety Compliance

Yes

Environmental

Yes

Best Practices / Recommendations

Location of Audit	L-114 R	edacted	Brentwo	od	Mile Poin	<u>t</u>	
Pipe diameter and thickness	Diameter	24"			Thickness 0.375"	_	
Date of Observation	4/	9/2013			Observer	Redacted	
Company performing NDT			West	ern Indus	trial X-Ray (W.I.)	X)	
Technician/s Name/s	Re	dacted					
Certification Level / Expiration	RT		Economic Contraction		RT	Assistant	
	MT				MT		
Procedures & Equipment							
Procedure used	RT	WIX-R1	-6	IAW -	API 1104 20th	Ed Effective 08-06-	2012
	MT .			IAW -			
Procedure available	RT		Yes	Х	No	_	
	MT		Yes_		No	-	
RT Technique	DWSI	X	SWSI				
Radiation type	lr 192	Х		Se 75		X Ray	
Source or Focal spot physical size		0.116			Activity or K	v <u>39</u>	
Geometric Unsharpness (Ug)	().0024			Exposure time	e 6:15	
Surface NDT method		N/A					
Power source	Port. (Generator Ba	ackup	W	elding set	Onboard Inverter	х

<u>Variables</u>

Film used	Manufacture	er	/	AGFA	Speed	d <u>D</u> 5	
Screens	Туре		Pb	Thickness	0.005/0.01	0 (Condition Good
Process method	Manual		Х	_	Automatic		CR
Process chemistry condition	New	Х	Aged	1 Week	Replenis	shed	Bad
Process time	Minutes	5	:30	_	Process T	emperature F°	69
Darkroom	Clean	Х	N	leed Cleanin	g	Surfaces	Very Clean
Safelight conditions	Good	Х	Cracked		Broken	Not workin	g
Film Viewer	Туре		Ventu	re	AI	l bulbs working	Х
Bulbs	Photoflood		Х	_	100W		60W
Rheostat	Working	Х	_		Foot switch		Working X
Suitable for film density	Yes	Х	N	o	_		
Densitometer	Yes	Х	N	o	Type S	peed Master SM	-12 (S/N 15251)
Calibrated	Yes	Х	N	o	Date2	2/6/2013	
Daily check	Yes	Х	N	0	By Reda	cted	
Film Density Strip Available	Yes	Х	N	o	_		

Developed film

IQI	Type ASTM 1 B	Wire required 0.016	Number Required 2
IQI Placement	Within 1" from X Left Extremity	Center X	Within 1" from Right Extremity X
Density of Film	Weld 2.86	Parent Material 3.05	
Number of IQI's	1	2 3 <u>X</u>	4
Sensitivity	Required 0.016	Achieved X	
Artifacts or Process Marks	Yes	No <u>X</u>	
Interpretation	By Redacted		Level
Interpretation accurate	Yes X	No	
Report	Completed	Required Information	In-Process X

Radiation Safety

CA License / Letter of Reciprocity	Redacted		_ Re	۷	49	
Operating & Emergency Procedures	NCT-4424-48	_ Re	ev	2		
10 CFR 19, 20, 34, 49, CCR Title 17	>	_				
Shipping Documentation	>	_				
MSDS for Radioactive Material)	Х				
DOT Regulations	>	<	_			
Dosimetry worn	Technician	Redacted	Assista	nt Re	edacted	
IRRSP or State card available	Technician Type		Assistant Type			
	Expires		Expires			
	Certification #		Certificatio	n #		
Source Information	Exp Device / Model	Tech Op	os 660B S/	'N	B3200	
	Capsule Model	CA-7	S/	′N	T-651	
	Dimensions	0.106" x 0.048" x	0.116" Le	eak Tested		2/21/2013
	Dep. Uranium Cert	Х				
	OEM Decay Chart	Χ				
Boundary Doserate - maximum dosera	te found <10	_mr/hr Within	legal limits	Yes X		No

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General Notes

Code Compliance

Yes, All film was in compliace with the code.

Safety Compliance

Very well safety compliant, Boundaries are set at appropriate distances and tech's are very aware of people and moving vehicles. Tech's control the boundaries and consistent on letting traffic move through the area between exposures.

Environmental

Yes

Best Practices / Recommendations

To keep up how they are working in a consistant safe manor.

Location of Audit	L-114	Redacted Bren	twood	Mile Point	
Pipe diameter and thickness	Diameter	24"	_	Thickness 0.375"	
Date of Observation	4/1	13/2013	_	Observer	Redacted
Company performing NDT		V	/.I.X (Weste	ern Industrial X-Ray)	
Technician/s Name/s	Reda	acted			
Certification Level / Expiration	RT	annan annan		RT	
	MT			MT	
Procedures & Equipment					
Procedure used	RT	WIX-RT-6	IAW	API 1104 20th E	Ed Effective 08-06-2012
	MT -		IAW		
Procedure available	RT		es X	No	
	MT	Y	es	No	
RT Technique	DWSI	X SW	SI	_	
Radiation type	lr 192 <u>)</u>	x	Se 7	5	X Ray
Source or Focal spot physical size	(0.116		Activity or Kv	39Ci
Geometric Unsharpness (Ug)	0	.0024	_	Exposure time	6:15
Surface NDT method		N/A	_		
Power source	Port. G	Generator Backu)	Welding set	Onboard Inverter X

<u>Variables</u>

Film used	Manufacture	er	AGFA	Speed	D5	
Screens	Туре	Pb	Thickness	0.005/0.010	C	ondition Good
Process method	Manual	X	_	Automatic		CR
Process chemistry condition	New	Aged	8 Days	Replenishe	d	Bad
Process time	Minutes	5:00	_	Process Ten	nperature F°	68
Darkroom	Clean	<u>X</u>	Need Cleanin	g	Surfaces	Good
Safelight conditions	Good	X Cracked		Broken	Not working	
Film Viewer	Туре	Ventu	re	All bu	Ibs working	
Bulbs	Photoflood	Х	_	100W	_	60W
Rheostat	Working	Х		Foot switch	_	Working
Suitable for film density	Yes	<u>X</u> N	o	_		
Densitometer	Yes	<u>X</u> N	o	Type Speed	lmaster SM-	12 (S/N 15251)
Calibrated	Yes	<u>X</u> N	o	Date2/6	6/2013	
Daily check	Yes	<u>X</u> N	o	By By		
Film Density Strip Available	Yes	<u>X</u> N	o	_		

Developed film

IQI	Type ASTM 1 B	Wire required 0.016	Number Required 8
IQI Placement	Within 1" from Left Extremity	Center <u>X</u>	Within 1" from Right Extremity X
Density of Film	Weld 2.45	Parent Material 2.95	
Number of IQI's	1	2 3 <u>X</u>	4
Sensitivity	Required 0.016	Achieved X	
Artifacts or Process Marks	Yes	NoX	
Interpretation	By Redac	ited	Level II
Interpretation accurate	Yes X	No	
Report	Completed	Required Information	In-Process X

Radiation Safety

CA License / Letter of Reciprocity	Redacted	d	Rev	49	
Operating & Emergency Procedures	NCT-4424-48	3 AEOP-1999	Rev	2	
10 CFR 19, 20, 34, 49, CCR Title 17	>	K	_		
Shipping Documentation	>	K	_		
MSDS for Radioactive Material		<			
DOT Regulations		<			
Dosimetry worn	Technician	Redacted	Assistant	Redacted	
IRRSP or State card available	Technician	Technician Redacted A		Redacted	
	Туре	RA	Туре	BO	
	Expires	12/16	Expires	12/16	
	Certification #	Redacted	Certification #	Redacted	
Source Information	Exp Device / Model	Tech O	ps 660B S/N	B3200	
	Capsule Model	CA-7	S/N	T651	
	Dimensions	0.106" x 0.048" x	0.116" Leak Te	sted	2/21/2013
	Dep. Uranium Cert	Х			
	OEM Decay Chart	X			
Boundary Doserate - maximum dosera	te found <10	_mr/hr Within	legal limits Ye	s <u>X</u>	No

General Notes

Code Compliance

1 reshot do to density being too light on a fitting to pipe joint. Reshot and corrected density.

Safety Compliance Using a 8 Half Value Layer Colimator

Environmental

None

Best Practices / Recommendations None

Location and Line #	a start and a start and a start	ne 114 Bre	ntwood		Ν	Vile Point	N/	A
Pipe diameter and thickness	Diameter	6", &	24"		Thickness		6"x0.280" / 24"x0.3	
Date of Observation	4/1	18/2013		0	Observer		Redacted	
	Work Order #				Job #			
Company performing NDT			West	tern Indus	trial X-Ra	ay (WIX)		
Technician/s Name/s		Redacted						
Certification Level / Expiration	RT				RT	ŀ	Assistant	
	MT		N/A		MT		N/A	
	UT		N/A		UT		N/A	
Procedures & Equipment	_				-			
Procedure used	RT	Wix-RT-6	i Rev O	In acco	rdance With	API-1104	20th Edition	
	MT	N//	٩	In acco	rdance With	N/	A	
	UT	N//	/	In acco	rdance With	N/	A	
Procedure available	RT	Yes_	Х	No_				
	MT	Yes_	N/A	No_	N/A			
	UT	Yes	N/A	No	N/A			

Magnetic Particle Inspection	<u>s</u> Inspe	ction Performed	YES		NO X	
MT Equipment:	Brand:		Model		S,	/N
Method:	AC:	DC:	FI	orescent	C	Dry
	Batch #			Concentrati	ion:	
	Leg Spacing:					
Radiometer:	Brand:		Model:		Serial N	lo:
	Calibratior	Due:		Detector S	S/N:	
	Visible Light Inter	nsity:		Florescent L	ight Intensi	t y :
Test weight:	YES	NO		LBS:	S,	/N
	Magnetic Field I		YES		NO	
Interpretation:	Accurate:	YES		NO		
Part:	Material Thick	ness:		Temp:		
Comm	ents: No Magnetic Part	icle Inspections we	re Performe	d on the day o	f this Obser	vation

UT Thickness Inspections	<u>s</u> Ins	spection Performed	YES	NO	Х	
Thickness Meter:	Brand: _					
	Range:		Velocity:		Gain:	
	A Scan: _			Thickness:		
	Echo to Echo	On:	0	ff:	_	
	Spot: _	Scan:	Gri	id:	Scan	Speed:
Transducer:	Make:		Model:		S/N	
	Size: _		Frequency:		Element:	
Calibration Block:	Туре: _		S/	N:		
	Material:		Within 25° of Part	: YES		No
Couplant:	Type: _			Batch No:		
Part:	Material Th	hickness:	Tem	ıp:		
C	omments: No UT Thicknes	ss Inspections were				

<u>Radiography</u>	Inspection Performed	YES X	NO		
RT Technique	Double Wall Exposure Single Wall View	X	Single Wall Exposure Single Wall View		
Radiation type	lr 192 X	Se 75	X Ray		
Source or Focal spot physical size	0.106" x 0.106" x 0.150"		Activity or Kv	92.8 CI	
Geometric Unsharpness (Ug)	0.003 for 24", 0.009 for 6"	Exposure time 2:30 for 24", 15Sec for 6"			
Power source	Port. Generator House Power X	Welding set		Onboard Inverter	

Comments: Looked at welds 401-413 every thing appears to be OK.

Radiography (Variables)

Film used	Manu	ıfacturer	A(SFA		Speed	D5/24" 8	& D4/6"	
Screens	Туре	PB (1	Lead)	Thickness	.005F /	.010B		Condition	ОК
Process method	Manual	4	Х	Ļ	Automatic				
Process chemistry condition	New	Х	Aged		Re	plenished		Bad_	
Process time	Minutes	5 N	ЛIN		Pro	cess Temp	erature F°	68'	•
Darkroom	Clean	Х	_ Ne	ed Cleaning			Surfaces		
Safelight conditions	Good _	Х	Cracked		Broken		No	t working	
Film Viewer	Туре		Venture	\$ •		All bulb	s working	Yes	•
Bulbs	Photoflood		X		100W			60W_	
Rheostat	Working	Х	_	Fc	oot switch			Working	
Suitable for film density	Yes	Х	No						
Densitometer	Yes	Х	No		Туре		X-Rite S/I	V 022852	
Calibrated	Yes_	Х	No		Date	Due 02-	01-2014		
Daily check	Yes _	Х	No		Ву	Redacted			
Film Density Strip Available	Yes _	Х	No		S/N		A181	270	
	Calibrated	Yes	X	No					

Radiography (Developed film)

IQI	Number of Wires Per View Required By Code: 2							
	Туре	ASTM B	Wire Diameter Required	0.013"	v	Vire Identification #	7	
	Wire	Sensitivity	Achieved YES	Х	NO			
IQI Placement	Within 1" from Left Extremity	Х	Center	Х	Within 1	" from Right Extremity X		
Density of Film	Weld	2.88	Parent Material	3.3				
Number of IQI's used	1		2	3_	Х	4		
Artifacts or Process Marks	Yes			No	Х			
Interpretation	By	Redac	cted		Level	Minima Kanada		
Interpretation accurate	Yes	Х		No				
Report	Completed		Required In	formation		In-Process	Х	

Radiation Safety

CA License / Letter of Reciprocity	Ca License #	Rev	49)	
Operating & Emergency Procedures	May be a discrepand	Rev	Rev	3	
10 CFR 19, 20, 34, 49, CCR Title 17	Crew had docur	_			
Shipping Documentation	Crew had docur	nents at site	_		
MSDS for Radioactive Material	Office working on pro	oviding document	_		
DOT Regulations	Crew had docur	nents at site	_		
Dosimetry worn	Technician	YES	Assistant	YE	S
IRRSP or State card available	Technician	Redacted	Assistant	Redacted	1
	Туре _	BO	Туре	R/	
	Expires _	12-16	Expires	12-:	16
	Certification #	Redacted	Certification #	Redact	ed
Source Information	Exp Device / Model	QSA 880 De	ltaS/N	02	6
	Capsule Model	A424-9	S/N	9366	
	Dimensions _	.106"x.106"x.1		k Tested _	Yes 04-12-2013
	Dep. Uranium Cert	YES 04-08-20	13		
	OEM Decay Chart _	YES			
Boundary Doserate - maximum dosera	ate found r	nr/hr Within	legal limits Yes _	Х	No

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General Notes

Code Compliance

Crew is following procedures and Code

Safety Compliance

No Safety Issues Found

Environmental

No Environmental Issues Found

Best Practices / Recommendations

No recommendations

Location and Line #		Line 114	Mil	Mile Point N/A			
Pipe diameter and thickness	Diameter	24"	Thickness	0.375"			
Date of Observation	4/19	/2013	Observer	Redacted			
	Work Order #		Job #				
Company performing NDT			estern Industrial X-	Ray			
Technician/s Name/s	Red	acted					
Certification Level / Expiration	RT	Market Science Sci 	RT	Assistant			
	МТ	N/A	MT	N/A			
	UT	N/A	UT	N/A			
Procedures & Equipment							
Procedure used	RT	Vix-RT-6 Rev0	In accordance With A	PI-1104 20th edition			
	МТ	N/A	In accordance With	N/A			
	UT	N/A	In accordance With	N/A			
Procedure available	RT	Yes N/A	No N/A				
	МТ	Yes N/A	No N/A				
	UT	Yes N/A	No N/A				

Magnetic Particle Inspections	Inspection Pe	erformed	YES	NO	X	
MT Equipment:	Brand:		Model		S/N	
Method:	AC:	DC:	Floresce	ent	Dry	_
	Batch #		Co	ncentration:		
	Leg Spacing:					
Radiometer:	Brand:		Model:		Serial No:	
	Calibration Due:		[Detector S/N:		
	Visible Light Intensity:		Flor	escent Light	Intensity:	
Test weight:	YES	NO	LB	S:	S/N	
	Magnetic Field Indicato	r Used:	YES	NO		
Interpretation:	Accurate:	YES	N	o	_	
Part:	Material Thickness:		Tem	p:		
Commen	ts:					

UT Thickness Inspectio	ns Ins	spection Performed	YES		NO	Х	
Thickness Meter:	Brand:						
	Model:			S/N			
			Velocity:			Gain:	
	A Scan:			т	hickness:		
	Echo to Echo	On:		Off:			
	Spot:						in Speed:
Transducer:	Make:		Model:			S/N	
	Size:						
Calibration Block:	Туре: _			S/N:_			
	Material:		Within 25°				No
Couplant:	Туре:			В	Batch No:		
Part:	Material T	hickness:		Temp: _			
	Comments:						

<u>Radiography</u>	Inspection Performed		YES	X NO		
RT Technique	Double Wall Expos	ure Single Wall View	Х	oosure Single Wall View		
Radiation type	lr 192	Х	Se 75		X Ray	
Source or Focal spot physical size	.106x.106x.15	0		Activity or Kv	92 Ci	
Geometric Unsharpness (Ug)		0.003		Exposure time		2:30
Power source	Port. Generator X		Welding set		Onboard Inverter	
	House	e Power				
Comments:	Arrived at site	e at 1:30 no welds	were ready	to be x-rayed y	et. At 4:00 Pm 2	
	were ready bo	oth welds were x-	rayed by 4:3	0Pm about 15 r	ninutes per weld.	
	I looked at we	eld 416 and 417 bo	oth welds ar	e ok.		

Radiography (Variables)

Film used	Manu	facturer	A0	ĪFA		Speed D	5	
Screens	Туре	Le	ead	Thickness	.005×	a.010	Condition_	New
Process method	Manual	2	Х	l	Automatic		CR	
Process chemistry condition	New	Х	Aged		Re	plenished	Bad_	
Process time	Minutes	5 ſ	Vin		Pro	cess Temperature F°	68	0
Darkroom	Clean	Х	Ne	ed Cleaning		Surfaces		
Safelight conditions	Good	Х	Cracked		Broken	No	t working	
Film Viewer	Туре		Met Light			All bulbs working	Х	
Bulbs	Photoflood		Х		100W		60W_	
Rheostat	Working	Х	_	Fo	oot switch		Working_	
Suitable for film density	Yes	Х	No					
Densitometer	Yes_	Х	No		Туре	X-Rite S/I	V 022852	
Calibrated	Yes_	Х	No		Date	2/1/2014		
Daily check	Yes_	Х	No		Ву	Redacted		
Film Density Strip Available	Yes	Х	No		S/N	A181	270	
	Calibrated	Yes	X	No				

Radiography (Developed film)

IQI	Number of Wires Per View Required By Code							
	Туре	ASTM B	Wire Diameter Requir	red 0.	013	v	Vire Identification #_	7
	Wire	Sensitivity	Achieved Y	ES	Х	NO		
IQI Placement	Within 1" from Left Extremity	Х	Cent	er	Х	Within 1	" from Right Extremity X	
Density of Film	Weld	Wet Film	Parent Mater	ial_We	t Film			
Number of IQI's used	1		2		3_	Х	4	
Artifacts or Process Marks	Yes				No	Х		
Interpretation	Ву	Reda	icted			Level_	Manage State Sta	
Interpretation accurate	Yes	Х			No			
Report	Completed		Require	d Inforr	nation		In-Process	Х

Radiation Safety

CA License / Letter of Reciprocity	Redacted	cense CA	Rev	49	
Operating & Emergency Procedures	Ye	Rev	Rev 3		
10 CFR 19, 20, 34, 49, CCR Title 17	Ye	_			
Shipping Documentation	Ye	Yes			
MSDS for Radioactive Material	Ye	_			
DOT Regulations	Ye	_			
Dosimetry worn	Technician	Yes	Assistant	Yes	
IRRSP or State card available	Technician	Redacted	Assistant	Redacted	
	Туре	BO	Туре Туре	Ra	
	Expires	12-16	 Expires	12-16	
	Certification #	Redacted	Certification #	Redacted	
Source Information	Exp Device / Model	QSA 880 Delta	S/N	026	
	Capsule Model	A424-9	S/N	936678	}
	Dimensions	.106x.106x.1	.50 Le	ak Tested	4/12/2013
	Dep. Uranium Cert	4/8/2013			
	OEM Decay Chart	Yes			
Boundary Doserate - maximum doser	ate found0	mr/hr Within	legal limits Yes	X	No

General Notes

Code Compliance

No Issues found

Safety Compliance

No Issues found

Environmental

No Issues found

Best Practices / Recommendations

No Issues found

Location and Line #	Line 114 Brentwood		Mi	le Point N/A
Pipe diameter and thickness	Diameter	24"	Thickness	24"x0.375"
Date of Observation	4/30	0/2013	Observer	Redacted
	Work Order #		Job #	
Company performing NDT		Weste	rn Industrial X-Ray	/ (WIX)
Technician/s Name/s	R	edacted		
Certification Level / Expiration	RT	NAME OF TAXABLE PARTY	RT	1
	MT_	N/A	MT	N/A
	UT	N/A	UT	N/A
Procedures & Equipment				
Procedure used	RT	Wix-RT-6 Rev 0	In accordance With A	PI-1104 20th Edition
	MT_	N/A	In accordance With	N/A
	UT	N/A	In accordance With	N/A
Procedure available	RT	Yes X	No	
	МТ	Yes N/A	No_N/A_	
	UT	Yes N/A	No N/A	

Magnetic Particle Inspections	Inspectio	on Performed	YES_		NO	X	
MT Equipment:	Brand:		Model _			S/N	
Method:	AC:	DC:	F	lorescent		Dry	
	Batch #			Concentra	tion:		
	Leg Spacing:						
Radiometer:	Brand:		Model:			Serial No:	
	Calibration Du	ue:		Detector	S/N:		
	Visible Light Intensit	ty:		Florescent	Light	Intensity:	
Test weight:	YES	NO		LBS:		S/N	
	Magnetic Field Indi		YES_		NO		
Interpretation:	Accurate:	YES		NO			
Part:	Material Thickne	ess:		Temp:			
Commen	ts: No Magnetic Particle	e Inspections we	re Perform	ed on the day o	of this	s Observation	

UT Thickness Inspection	<u>s</u> Ins	spection Performed	YES	NO	<u>X</u>	
Thickness Meter:	Brand: _					
	Range:		Velocity:		Gain:	
	A Scan:			Thickness:		
	Echo to Echo	On:	Off	:		
	Spot: _	Scan:	Grid	:	Scan Speed:	
Transducer:	Make:		Model:		S/N	
	Size:		Frequency:		Element:	
Calibration Block:	Туре: _		S/N	:		
	Material:		Within 25° of Part:	YES	No	
Couplant:	Туре: _			_Batch No:		
Part:	Material T	hickness:	Тетр	:		
C	Comments: No UT Thicknes	ss Inspections were	Performed on the day	y of this Obs	servation	

Radiography	Inspection Per	formed	YES X	NO		
RT Technique	Double Wall Exposure Single Wall View		X Single Wall Ex		posure Single Wall View	
Radiation type	lr 192 X		Se 75		X Ray	
Source or Focal spot physical size	0.106" x 0.106" x 0.150)"		Activity or Kv_	83CI	
Geometric Unsharpness (Ug)		0.003	E	xposure time _		2:40
Power source	Port. Generator House Power	X	Welding	set	Onboard Inverter	
Comments						

Radiography (Variables)

Film used	Manu	facturer	A(GFA		Speed D	5	
Screens	Туре	PB (1	Lead)	Thickness	.005F /	.005B	Condition	ок
Process method	Manual	2	Х		Automatic			
Process chemistry condition	New		Aged	1 Week	Re	plenished	Bad_	
Process time	Minutes	4 M	VIN		Pro	cess Temperature F°	72°	•
Darkroom	Clean	Х	_ Ne	ed Cleaning		Surfaces		
Safelight conditions	Good	Х	Cracked		Broken	No	t working	
Film Viewer	Туре		Venture			All bulbs working	Yes	•
Bulbs	Photoflood		Х		100W		60W_	
Rheostat	Working	Х	_	Fo	oot switch		Working	
Suitable for film density	Yes	Х	No					
Densitometer	Yes	Х	No		Туре	X-Rite S/I	V 022852	
Calibrated	Yes	Х	No		Date	Due 02-01-2014		
Daily check	Yes	Х	No		Ву	Redacted]	
Film Density Strip Available	Yes	Х	No		S/N	A181	270	
	Calibrated	Yes	X	No				

Radiography (Developed film)

IQI	Number of	y Code:	2			
	Type ASTM I	Wire Identification #7				
	Wire Sensitivi	ty Achieved YES	Х	NO		
IQI Placement	Within 1" from X	Center	x	Within 1" from R Extrei	- 1/	
Density of Film	Weld 3.3	Parent Material	3.5			
Number of IQI's used	1	22	3_	Х	4	
Artifacts or Process Marks	Yes		No	Х		
Interpretation	Ву	edacted		Level		
Interpretation accurate	Yes X	_	No			
Report	Completed	Required Info	ormation		In-Process	Х

Radiation Safety

CA License / Letter of Reciprocity	Ca License #	Redacted	R	ev	50		
Operating & Emergency Procedures	Crew had docu	ments at site	R	ev	Rev	3	
10 CFR 19, 20, 34, 49, CCR Title 17	Crew had docu	_					
Shipping Documentation	Crew had docu	ments at site	_				
MSDS for Radioactive Material	Office working on pro	oviding document	_				
DOT Regulations	Crew had docu	ments at site	_				
Dosimetry worn	Technician	YES	Assistar	nt_	YE	S	
IRRSP or State card available	Technician	Redacted	Assistar	nt	Redacted		
	Туре	BO	Тур	e	RA	l.	
	Expires	12-16	Expire	es	6-1	6	
	Certification #	Redacted	Certification	#	Redac	ted	
Source Information	Exp Device / Model	QSA 880 D	elta S/	/N	02	ô	
	Capsule Model	A424-9	S/	/N	9366	7B	
	Dimensions _	.106"x.106"x		Leak	Tested	Yes 04-12-	2013
	Dep. Uranium Cert	YES 04-08-2	013				
	OEM Decay Chart	YES					
Boundary Doserate - maximum dosera	ate found <u>1</u>	mr/hr Within	n legal limits Y	es	Х	No	

General Notes

Code Compliance

Crew is following procedures and Code

Safety Compliance

No Safety Issues Found

Environmental

No Environmental Issues Found

Best Practices / Recommendations

No recommendations

Location and Line #	a and a second s	ne 114 Bro	entwood		r	Mile Point _	N/.	4
Pipe diameter and thickness	Diameter	24	99 99	ī	Thickness		24"x0.375"	
Date of Observation	5/	1/2013		0	Observer		Redacted	
	Work Order #				Job #			
Company performing NDT			Wes	tern Indus	trial X-Ra	ay (WIX)		
Technician/s Name/s		Redacted					Redacted	
Certification Level / Expiration	RT				RT		and the second se	
	MT		N/A		МТ		N/A	
	UT		N/A		UT		N/A	
Procedures & Equipment								
Procedure used	RT	Wix-RT-0	6 Rev 0	In acco	rdance With	API-1104	20th Edition	
	MT	N/.	A	in acco	rdance With	N/.	Α	
	UT	N/.	Д	In acco	rdance With	N/.	A	
Procedure available	RT	Yes_	Х	No				
	МТ	Yes_	N/A	No	N/A			
	UT	Yes	N/A	No	N/A			

Magnetic Particle Inspection	<u>s</u> Inspe	ction Performed	YES		NO X	
MT Equipment:	Brand:		Model		S,	/N
Method:	AC:	DC:	FI	orescent	C	Dry
	Batch #			Concentrati	ion:	
	Leg Spacing:					
Radiometer:	Brand:		Model:		Serial N	lo:
	Calibratior	Due:		Detector S	S/N:	
	Visible Light Inter	nsity:		Florescent L	ight Intensi	t y :
Test weight:	YES	NO		LBS:	S,	/N
	Magnetic Field I		YES		NO	
Interpretation:	Accurate:	YES		NO		
Part:	Material Thick	ness:		Temp:		
Comm	ents: No Magnetic Part	icle Inspections we	re Performe	d on the day o	f this Obser	vation

UT Thickness Inspection	<u>IS</u> Ins	pection Performed	YES	NO	X
Thickness Meter:	Brand:				
	Range:		Velocity:		Gain:
	A Scan:			Thickness:	
	Echo to Echo	On:	Off	:	
	Spot: _	Scan:	Grid	:	Scan Speed:
Transducer:	Make:		Model:		S/N
	Size:		Frequency:		Element:
Calibration Block:	Туре: _		S/N	:	
	Material:		Within 25° of Part:	YES	No
Couplant:	Туре: _			_Batch No:	
Part:	Material T	hickness:	Тетр	:	
C	Comments: No UT Thicknes	ss Inspections were	Performed on the day	y of this Obs	servation

<u>Radiography</u>	Inspection Pe	rformed	YES X	NO		
RT Technique	Double Wall Exposure Single \	Wall View	X	Single Wall Exp	osure Single Wall View	
Radiation type	lr 192 X		Se 75		X Ray	
Source or Focal spot physical size	0.106" x 0.106" x 0.15	0"		Activity or Kv_	82CI	
Geometric Unsharpness (Ug)		0.003	I	Exposure time _		2:40
Power source	Port. Generator House Power	<u>X</u>	Welding	set	Onboard Inverter	
Comments:						

Radiography (Variables)

Film used	Manu	facturer	AC	3FA		Speed D	5	
Screens	Туре	PB (1	Lead)	Thickness	.005F /	.005B	Condition	ок
Process method	Manual		Х		Automatic			
Process chemistry condition	New		Aged	1 Week	Re	plenished	Bad	
Process time	Minutes	4 r	VIN		Pro	cess Temperature F°	72°	•
Darkroom	Clean	Х	Ne	ed Cleaning		Surfaces		
Safelight conditions	Good	Х	Cracked		Broken	No	t working	
Film Viewer	Туре		Venture	•		All bulbs working	Yes	,)
Bulbs	Photoflood		Х		100W		60W_	
Rheostat	Working	Х	_	Fo	oot switch		Working	
Suitable for film density	Yes	Х	No					
Densitometer	Yes_	Х	No		Туре	X-Rite S/I	N 022852	
Calibrated	Yes	Х	No		Date	Due 02-01-2014		
Daily check	Yes	Х	No		Ву	Redacted		
Film Density Strip Available	Yes_	Х	No		S/N	A181	L270	
	Calibrated	Yes	X	No				

Radiography (Developed film)

IQI	Nu	mber of Wi	res Per View Required	By Code:	2		
	Туре	ASTM B	Wire Diameter Required	0.013"	v	Vire Identification #	7
	Wire	Sensitivity	Achieved YES	Х	NO		
IQI Placement	Within 1" from Left Extremity	Х	Center	Х	Within 1	" from Right Extremity X	
Density of Film	Weld	3.3	Parent Material	3.5			
Number of IQI's used	1		2	3_	Х	4	
Artifacts or Process Marks	Yes			No	Х		
Interpretation	Ву	Redac	ted		Level		
Interpretation accurate	Yes	Х		No			
Report	Completed	_	Required Ir	nformation		In-Process	Х

Radiation Safety

CA License / Letter of Reciprocity	Ca License #	Redacted	. Rev_	50	
Operating & Emergency Procedures	Crew had docur	nents at site	. Rev_	Rev	3
10 CFR 19, 20, 34, 49, CCR Title 17	Crew had docur	nents at site			
Shipping Documentation	Crew had docur	nents at site			
MSDS for Radioactive Material	Office working on pro	oviding document			
DOT Regulations	Crew had docur	nents at site			
Dosimetry worn	Technician	YES	Assistant	YES	,)
IRRSP or State card available	 Technician	Redacted	Assistant	Redacted	
	Туре	BO	Туре	RA	
	Expires	12-16	Expires	6-16	<u> </u>
	Certification #	Redacted	Certification #	Redacted	
Source Information	Exp Device / Model	QSA 880 Del	ta S/N	026	
	Capsule Model	A424-9		93667	7B
	Dimensions	.106"x.106"x.1	50" Lea	k Tested	Yes 04-12-2013
	Dep. Uranium Cert	YES 04-08-201	13		
	OEM Decay Chart	YES			
Boundary Doserate - maximum doser	ate found <u>1</u> n	nr/hr Within l	egal limits Yes_	Х	No

General Notes

Code Compliance

Crew is following procedures and Code

Safety Compliance

No Safety Issues Found

Environmental

No Environmental Issues Found

Best Practices / Recommendations

Crew has good practice with ALARA, 1 person stands at each end of the boundary. Crew uses both survey meters when X-Raying. GOOD BEST PRACTICES

Attachment 4

L-114 Assessment for RT and UT Indications for L-114 Re-Inspection





LINE 114 ASSESSMENTS

ASSESSMENT OF RT AND AUT INDICATIONS FOR

WELDS 162, 237, 259, 262, 270, 311

REPORT 413.61-13.412

Author:

Redacted

Senior Advising NDT Engineer Applied Technology Services Reviewed: Redacted

NDT Supervisor Applied Technology Services

Date of Issue: 11/26/13

ATS Report #: 413.61-13.412 Rev 0



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Executive Summary

In response to PG&E's identification of non-code compliant Radiographic testing at Line 114, reinspection was performed on all related welds utilizing API-1104 compliant inspection methods. The two methods utilized were Radiographic testing (41 welds) and Automated Ultrasonic testing (101 welds).

During Radiographic re-inspection, welds; W162, W270 & W311 were interpreted by an NDE service provider performing the inspections, to be unacceptable to the radiographic acceptance criteria of API-1104. These indications were reviewed in the field by PG&E NDE staff and found to be acceptable. To further confirm the nature of the indications on welds 270 and 311 as acceptable, film digitization and a physical investigation of the welds were performed, validating the original ATS decision for acceptance. During Ultrasonic inspection, welds; W162, W237, W259, & W262, were identified as having Ultrasonic indications unrelated to radiographic findings, which could not be physically verified. Where the exact nature of the ultrasonic indications could not be determined, welds W162, W237, W259 & W262, were removed and replaced. Physical evaluations of the removed welds and comparative film review against original radiographic images for all welds were performed to verify original code acceptance to radiographic criteria.

This report finds that the original radiographic interpretations to accept all 6 welds (W162, W237, W259, W262, W270 and W311) to the requirements of API 1104 were correct.

The approach, findings and results of this report were reviewed and approved by an independent NDE expert Redacted



1.0 Background

- 1.1 A review of Line 114 girth weld radiographic inspection identified instances of under-inspection by a NDT contractor to the requirements of API 1104 and the contractor's own method procedures. Re-inspection has been performed to date on 41 welds by API 1104 compliant Radiography, and 101 welds by API 1104 compliant AUT for welds which were buried/inaccessible for radiography. Six (6) welds were found to have indications requiring further review.
- 1.2 API 1104 states that both radiography and ultrasonic inspection are permitted methods to determine soundness of welds to the code requirements. Each method has its advantages and limitations, and therefore unique sensitivities & probability of detection. It is hence understood that exams of the same weld will routinely yield variation in both calls of actual imperfections, and also other indications arising from metallurgical and geometric characteristics.
- 1.3 This report describes the approach, assessment and conclusions regarding the noted indications from Radiographic and Ultrasonic exams of these six girth welds.

2.0 Approach for Radiographic Indications

- 2.1 Following identification of Radiographic Inspection deficiencies by NDE contractor TCI, PG&E requested NDT contractor, Western Industrial X-ray (WIX), to perform radiography on 41 TCI welds to API-1104 requirements. Their reports indicated potential concerns for porosity or burn through on welds 270 and 311, and an indication of undercut on weld 162.
- 2.2 PG&E NDT Level III personnel reviewed the WIX film interpretations for porosity on Welds 270 & 311 and undercut on Weld 162, and also re-reviewed the original TCI film & interpretations which had coverage in the regions of interest, including a called indication on weld 311 in the WIX region of interest.
- 2.3 ATS performed digital radiographic thickness measurements on Weld 162, using the parent material & image quality indicator (IQI) wires as step calibration. This activity was performed to rule out Machs Bands (Figure 1) severity effects, which can influence the interpretation of undercut, and also to provide ROM estimation of any actual undercut conditions.



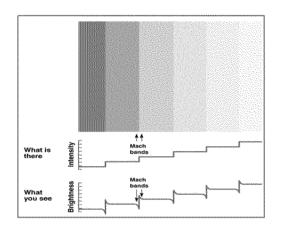


Figure 1 – Machs Bands Effects

- 2.4 Local repairs were performed on welds 270 and 311 to investigate and confirm the cause of the indications. ATS reviewed WIX final radiography of both welds to API 1104 requirements.
- 2.5 For the WIX noted undercut indication on weld 162, following its removal from Line 114, ATS attempted to measure the surface topography in the region of interest (ROIs) using weld undercut gages in addition to calibrated dial indicators.
- 2.6 Where the majority of negative excursions into the parent material were observed to be very superficial, additional Creaform (photogrammetry) imaging was performed to obtain more precise measurements.
- 2.7 The results of the visual, radiographic and dimensional data sets were evaluated and summarized in the findings.
- 2.8 AUT calibrations and reports were reviewed with emphasis on the called indication ROIs. For the AUT findings on welds 162, 237, 259 & 262, additional radiographic images were produced on Class I film.
- 2.9 Reconciliation of the weld surfaces with Radiographic and AUT data-sets was attempted, and the results are documented in the findings.

3.0 Assessment/Findings

3.1 Weld 270, digitized in the region of interest is depicted in Figure 2. Here it can be seen, due to low change in density which is less than the adjacent parent material, and the presence of a halo, that the indication is one of Burn-Through (BT), and is acceptable per section 9.3.7 of API-1104. The weld repair process confirmed this result where the indication was found at the root.



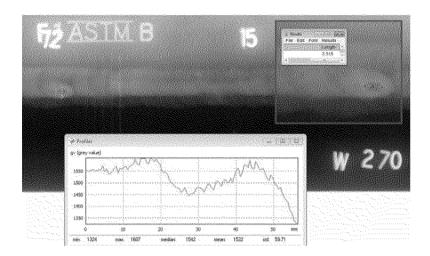


Figure 2 - Weld 270 Indication with measurement inset showing length of 0.157" (3.9mm)

3.2 Weld 311, digitized in the region of interest, is depicted in Figure 3. Similarly we have one indication of burn-through and 3 small pores, all of which are acceptable per sections 9.3.7 & 9.3.9 of API 1104. For both welds 270 and 311, the repair process had to proceed to the root before the indications were eliminated, confirming that they were caused by burn through.

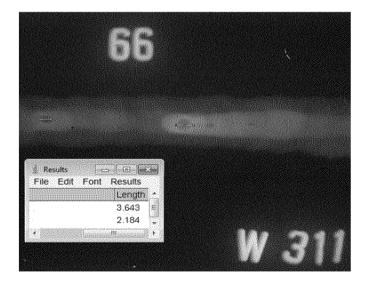


Figure 3 – Weld 311 with acceptable BT length of 0.141" and acceptable small pores

3.3 Weld 162 indication was digitized as shown below in Figure 4. Radiographic density measurements indicate that no portion of the indication has an indication of undercut which is greater than 0.016" deep, indicating that it is acceptable per section 9.3.11& 9.3.7 of API 1104.

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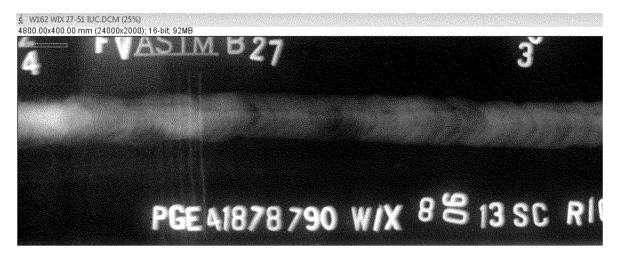


Figure 4 – Weld 162 with acceptable indications of undercut

- 3.4 To validate the digital radiographic measurements, external visual, UC gaging and dial indicator measurements revealed that only small areas within the called ROI (25-29) had bottoms estimated below the adjacent parent material surface. Measurements had thus low repeatability due to topography. This result led to the decision for the Creaform photogrammetry with its calibrated 40 micron spatial resolution and accuracy to within 0.002".
- 3.5 Creaform photogrammetry results were obtained for the radiographic ROI (25-29 in Figure 4). The measurements confirm that no portion of the indicated area of concern radiographically, has a depth greater than 0.016 inches, and is therefore acceptable per sections 9.3.11 & 9.7. Figure 5 below depicts worst case of 0.0074" in radiographic ROI.

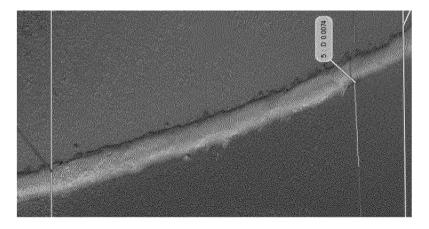


Figure 5 – Measured IUC on W162 depicted in Figure 4

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3.6 The welds 162, 237, 259, and 262 regions of interest from the AUT were re-radiographed at PG&E ATS facility using higher sensitivity Class I film. The interpretations of these radiographs are that the 4 welds are acceptable per API 1104 radiographic requirements. Where the AUT exams may be more sensitive and optimized to certain flaw orientations, compared to radiography, we have removed any AUT indicated welds from the system.

4.0 <u>Conclusions</u>

The radiographic evaluations, visual, and mechanical measurements performed and memorialized in this report, re-confirm the initial decision that welds 162, 237, 259, 262, 270, & 311 are acceptable per API 1104, 20th edition. This was verified by independent NDE expert, David Culbertson.

<u>Attachment 5</u>

Line 114 Assessments Quantitative Analysis of Undercut Notations



LINE 114 ASSESSMENTS

QUANTITATIVE ANALYSIS OF UNDERCUT NOTATIONS

WELDS 760, 770, 771, 781, 738

REPORT 413.61-13.406

	Redacted		Redacted	
Author:	Redacted Senior Advising NDT Engineer Applied Technology Services	Reviewed:	Redacted Date: 2013.10.28 NDT Supervisor 10:05:36 -07'00' Applied Technology Services	

ATS Report #: 413.61-13.406 Rev 0 Date of Issue: 10/28/13



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Appendix I	Presentation on quantitative analysis of UC	
Appendix II	Independent review of radiography	
Appendix III	WIX report of radiography	



Executive Summary

In response to a regulatory audit, five Line 114 girth welds were identified by the auditor as unacceptable undercut (UC) conditions to (American Petroleum Institute) API 1104 weld quality requirements. A review of the Radiographic & Visual inspection data was accomplished by ATS NDT specialists. The information from this review was then registered to the applicable weld circumferences. A further review of the X-Ray data and interpretation by an outside Level III NDT consultant was requested by ATS and performed by NDT Technical Services. Following extraction of these welds from Line 114, dimensional measurements were made of the regions of interest using high precision, laser based photogrammetry (Creaform). The sum of these (re)assessments indicate that the five welds in question (738, 760, 770, 771, & 781) of Line 114 meet API 1104 code requirements for undercut in the identified regions of interest, and are acceptable.



1.1 A regulatory audit of Line 114 girth welds performed 9/25/2013 resulted in a report of concern for unacceptable undercut (UC) in discrete locations on the five below identified welds.

No.	Weld No.	Regulatory - Level III Interpretation	Location in View
1	W-738	External Undercut (EUC)	36-42
2	W-760	Internal Undercut (IUC)	24-27
3	W-770	Internal Undercut (IUC)	36-42
4	W-771	Internal Undercut (IUC)	12-24
5	W-781	Internal Undercut (IUC)	44-49

1.2 This report describes the ATS approach, assessment and conclusions regarding the audit claim of API 1104 code discrepancies for these welds, as well as actions taken following regulatory direction to remove the five welds from service.

2.0 Approach

- 2.1 Upon notification of the audit results, ATS requested the NDT contractor, Western Industrial Xray (WIX), to perform a second film interpretation review of the audit noted regions of interest.
- 2.2 ATS NDT Level III personnel reviewed the WIX film interpretation. ATS also performed digital radiographic thickness measurements, using the parent material & Image Quality Indicator (IQI) wires as step calibration. This activity was performed to rule out Machs Bands severity effects, depicted in Figure 1, on interpretation, and also provide ROM estimation of any actual undercut conditions.

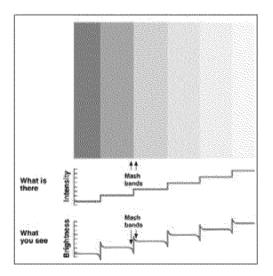


Figure 1 – Machs Bands Effects

Date of Issue: 10/28/13



- 2.3 A third party Level III NDT consultant, Redacted of NDT Technical Services was also asked to review the WIX Radiographic interpretation.
- 2.4 Following regulatory direction to remove the five welds from Line 114, visual examination was performed to assess the location & condition of the regions of interest (ROI's).
- 2.5 ATS attempted to measure the surface topography in the ROI's using weld undercut gages in addition to calibrated dial indicators.
- 2.6 Where the majority of negative excursions into the parent material were observed to be very superficial, additional Creaform (photogrammetry) imaging was performed to obtain more precise measurements.
- 2.7 The results of the visual, radiographic and dimensional data sets were evaluated and summarized in the Appendix I presentation of this report.

3.0 <u>Findings</u>

- 3.1 Against the requirements for undercut outlined in API 1104 p. 9.3.11, WIX found no nonconformances for any of the five welds in question. The evaluation process and results of which are memorialized in Appendix III. While there are indications acknowledged at the Section 1.1 locations, their interpretation was that no rejectable undercut existed.
- 3.2 ATS reviewed the WIX report, and then submitted the report and film to NDT Technical Services for further review by Redacted His results concluded that against the API 1104 p. 9.3.11 requirements for undercut, no rejectable conditions existed. His interpretation was similar to that of WIX, applying criteria of severity/morphology, and length. The results of the Redacte Redacted review are memorialized in Appendix II.
- 3.3 Following direction that the five welds be either repaired or removed from Line 114, ATS began preliminary work to digitize the views of interest. From the digitized views, approximate estimates were made for the depth of the indications, relating density to thickness using known values in the image for calibration. These results generally validated the interpretations of WIX and NDT Technical Services, and are reported in Appendix I. While this method is not specifically adopted by the API 1104 code, it is in broad acceptance in the Aerospace and Nuclear industries and the tools are integrated into all current digital imaging platforms.
- 3.4 External visual, UC gaging and dial indicator measurements revealed that only small areas within the called ROI's had depths estimated below the adjacent parent material surface. Measurements had thus low repeatability due to topography. This result led to the decision for the Creaform photogrammetry with its calibrated 40 micron spatial resolution and accuracy to within 0.002".



3.5 Creaform photogrammetry results were obtained for all the radiographic ROI's. The criteria applied to these results were API 1104 section 9.7, Table 4, "Maximum Dimensions of Undercutting". Applying the further criteria of depth from this requirement, to the documented radiographic and visual measurement data for length, all welds were found acceptable. Figure 2, from slide 5 in Appendix I, summarizes the typical physical condition for the audit identified indications of concern.

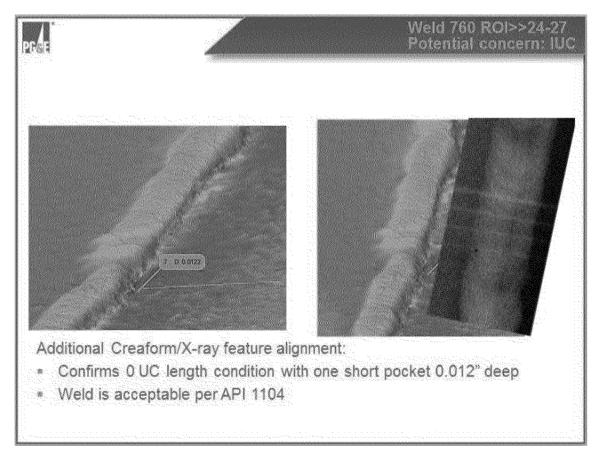


Figure 1 – Assessment of Weld 760 IUC region of interest



4.1 Against the requirements for undercutting contained in section 9.3.11, and section 9.7 of API 1104 twentieth edition, the findings of this report lead ATS to conclude that Welds 738, 760 770, 771, 781 of line 114 are acceptable.

No.	Weld No.	Regulatory - Level III	Location in	Final Disposition
		Interpretation	View	
1	W-738	External Undercut (EUC)	36-42	Acceptable to API 1104, 20 th edition
2	W-760	Internal Undercut (IUC)	24-27	Acceptable to API 1104, 20 th edition
3	W-770	Internal Undercut (IUC)	36-42	Acceptable to API 1104, 20 th edition
4	W-771	Internal Undercut (IUC)	12-24	Acceptable to API 1104, 20 th edition
5	W-781	Internal Undercut (IUC)	44-49	Acceptable to API 1104, 20 th edition

Appendix I

ATS presentation on quantitative analysis of UC,



Appendix II

Independent review of radiography by NDT Technical Services,



Appendix III

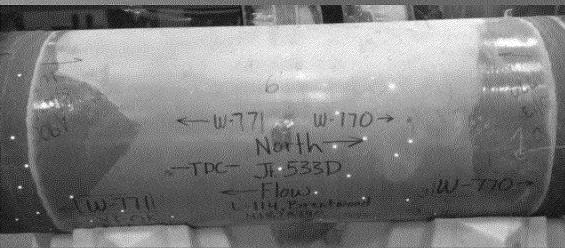
WIX report of radiography

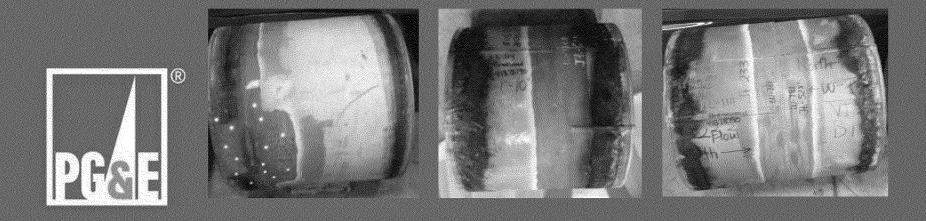


Date of Issue: 10/28/13

Appendix I

Line 114 Assessment of PHMSA UC concerns on welds 738, 760, 770, 771, 781





PEGE

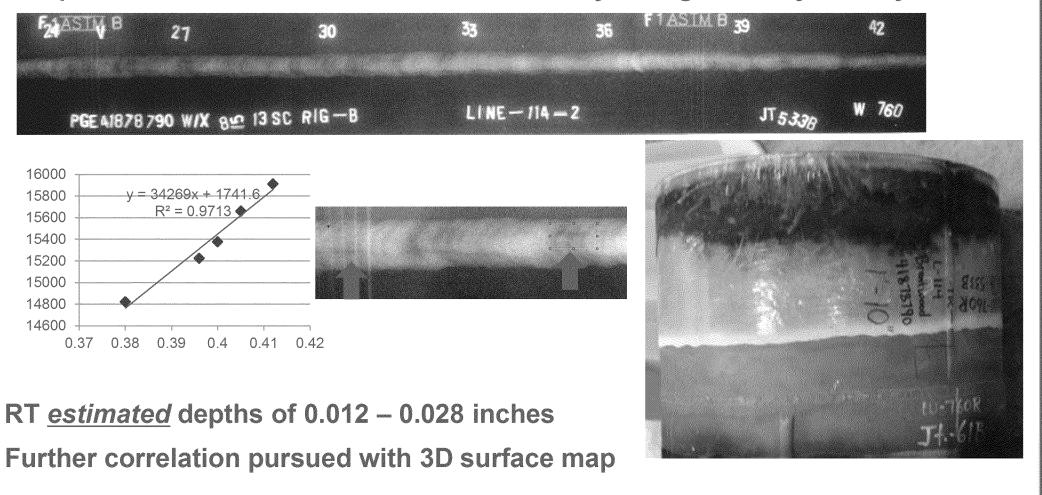
This appendix summarizes visual, photogrammetry (Creaform), and digital radiographic assessments performed on indications reported to PG&E/ATS as external and internal undercut, during a 9/25/2013 regulatory (PHMSA) audit

- * The below table summarizes the audit findings
- * Slides 3-18 document the findings from the ATS assessment
- * Results indicate that all five welds are acceptable to API 1104 requirements

No.	Weld No.	Regulatory Level III Interpretation	Location in View
1	W-738	External Undercut (EUC)	36-42
2	W-760	Internal Undercut (IUC)	24-27
3	W-770	Internal Undercut (IUC)	36-42
4	W-771	Internal Undercut (IUC)	12-24
5	W-781	Internal Undercut (IUC)	44-49

PF/8E

Weld 760 cited for indications of internal undercut from 24-27 Excised weld photo-documented and ROI aligned with weld features Depth of most severe indications estimated by change in x-ray density



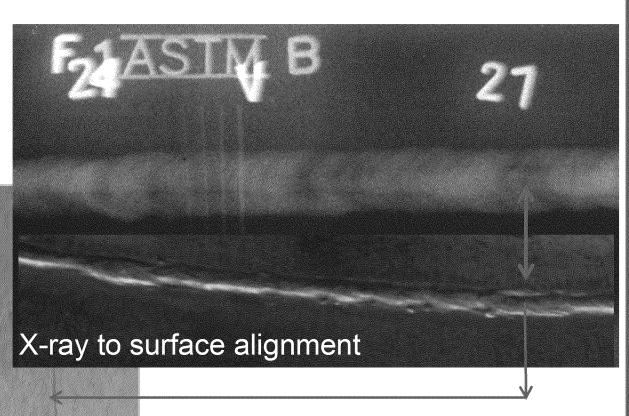
PR/eE

Weld 760 ROI>>24-27 Potential concern: IUC

Digital surface profile tool alignment



D 0.0122

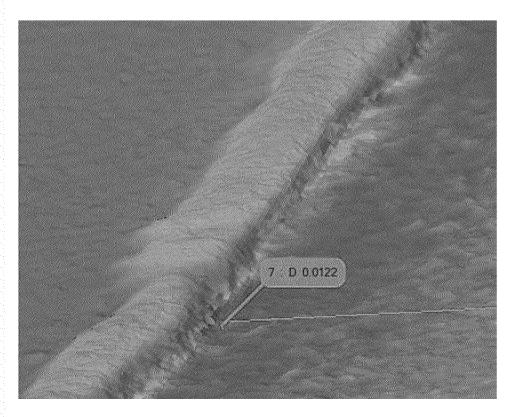


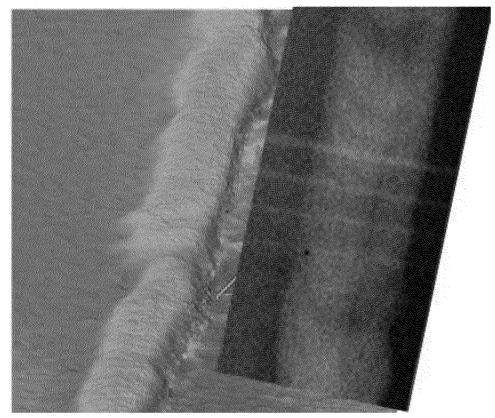
Creaform 3D (+/- 0.002") surface profile:

- Confirms indications are mostly diffraction effects on minor hi/lo condition with 0 UC
 - Two small pockets are 12 and 28 mils deep with greatest length of 0.250"

Weld is acceptable per API 1104

PF/8F



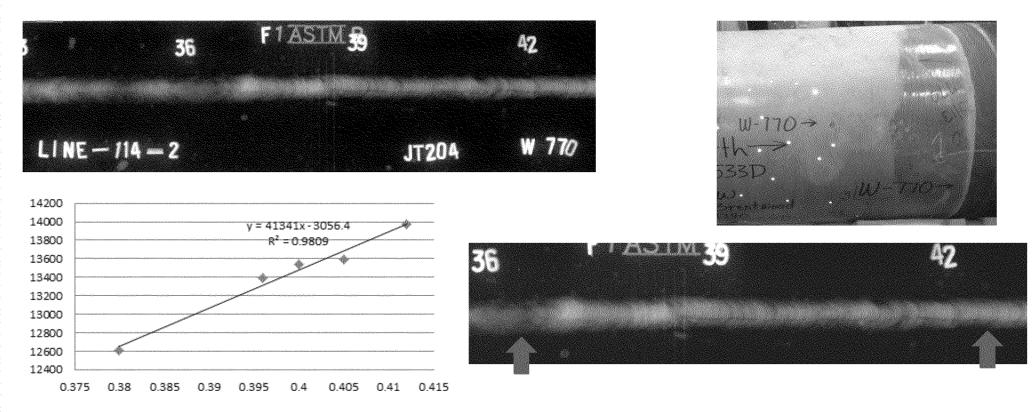


Additional Creaform/X-ray feature alignment:

- * Confirms 0 UC length condition with one short pocket 0.012" deep
- * Weld is acceptable per API 1104

PF/eF

Weld 770 cited for indications of internal undercut from 36-42 Excised weld photo-documented and ROI aligned with weld features Depth of most severe indications estimated by change in x-ray density



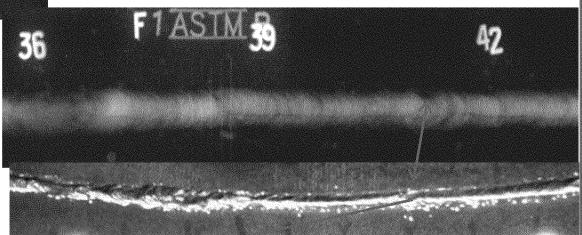
RT estimated depths of up to 0.008 inches

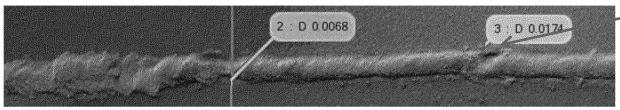
Further correlation pursued with 3D surface map

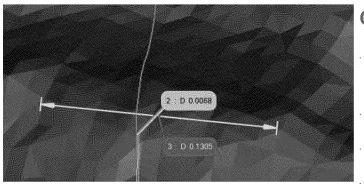
PR&E

Digital surface profile tool alignment









Creaform 3D (+/- 0.002") surface profile:

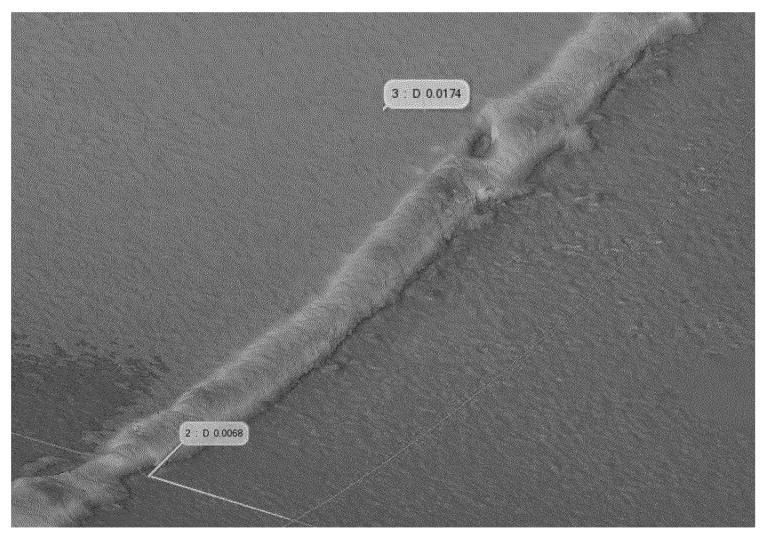
Confirms indications are, in the majority, diffraction effects on minor hi/lo condition with 0 UC

One small pocket observed at 0.007" deep x 0.130" long

One unrelated pocket opposite ROI of 0.017" deep x 0.195" long

Weld is acceptable per API 1104

PF/SF

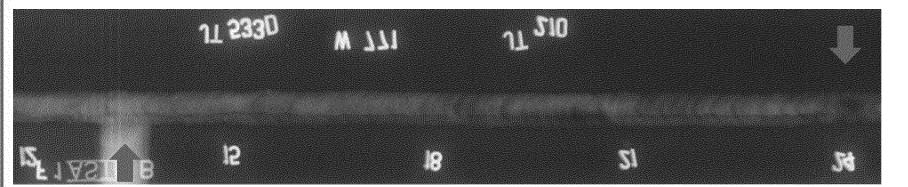


Additional Creaform/Polyworks perspective of ROI 36-42:

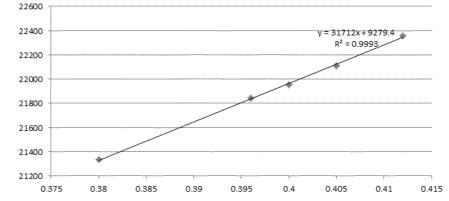
- * Confirms UC indication is diffraction/"shadowing" from high/low condition
- * Weld is acceptable per API 1104

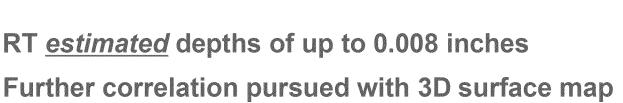
PE/8E

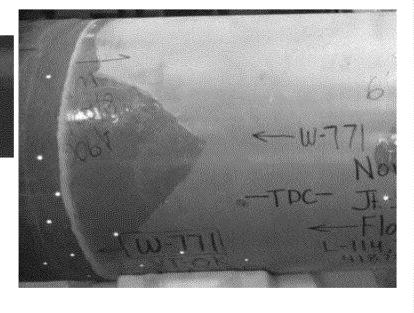
Weld 771 cited for indications of internal undercut from 12-24 Excised weld photo-documented and ROI aligned with weld features Depth of most severe indications estimated by change in x-ray density



Р

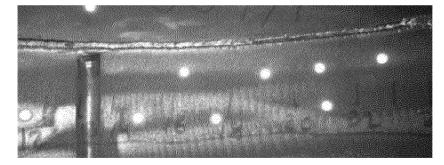




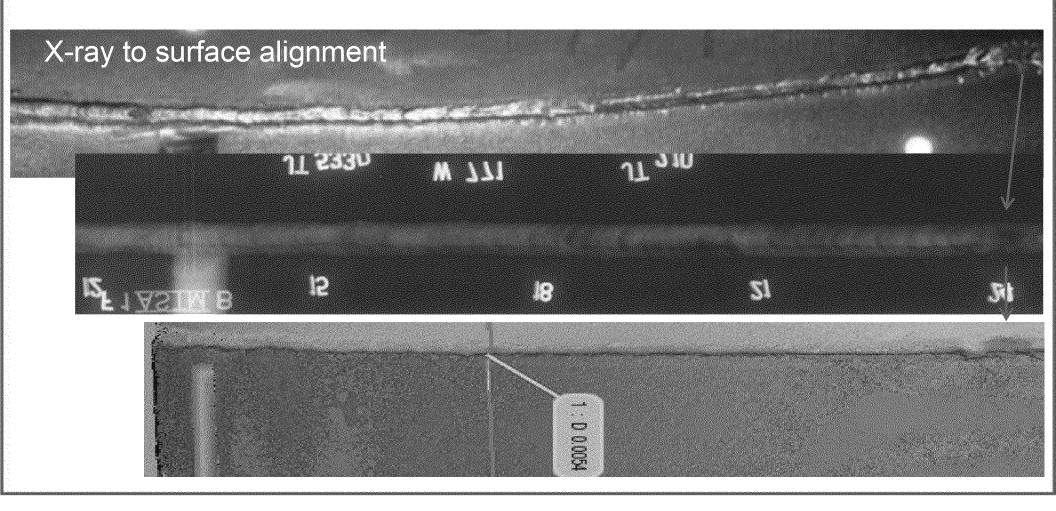


PG@E

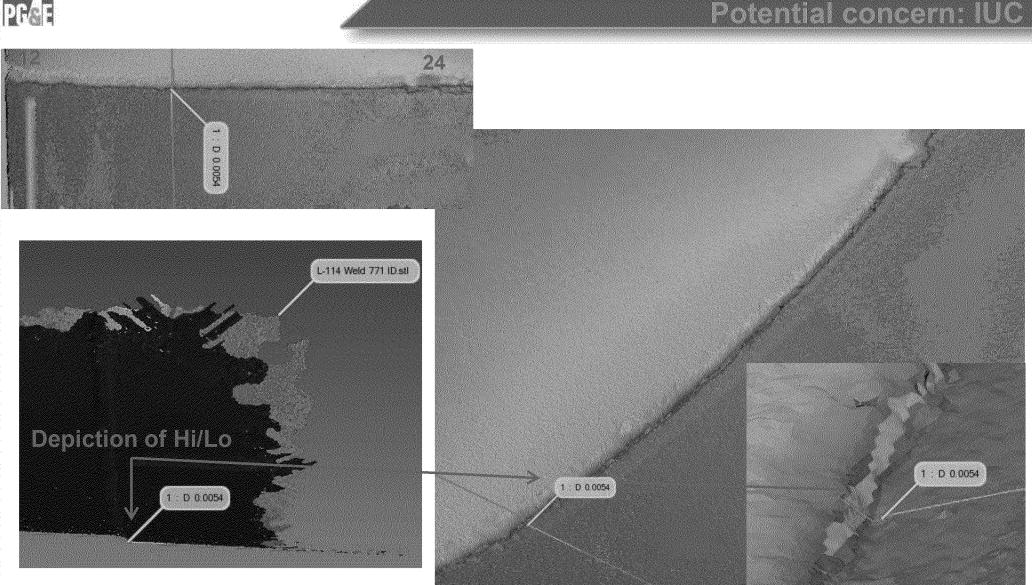
Digital surface profile tool alignment



- Creaform 3D (+/- 0.002") surface profile:
 - Confirms indications are mostly diffraction effects on minor hi/lo condition with 0 UC
 - Deepest region along length is 0.006 inches
 - Weld is acceptable per API 1104







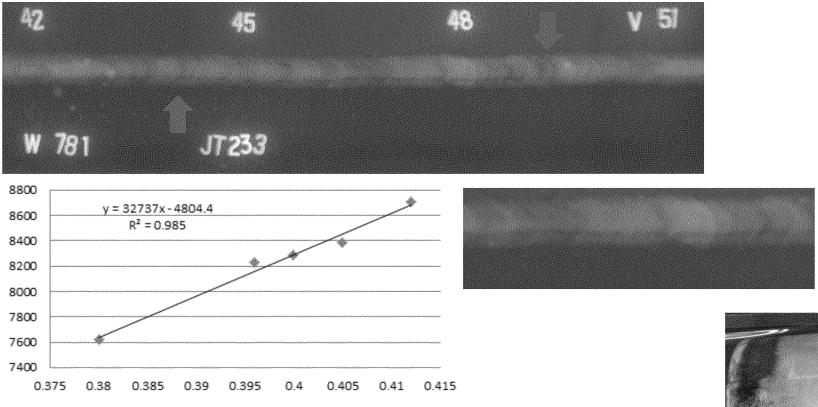
Additional Creaform/Polyworks perspective of ROI 12-24:

- * Confirms UC indication is diffraction/"shadowing" from high/low condition
- * Weld is acceptable per API 1104

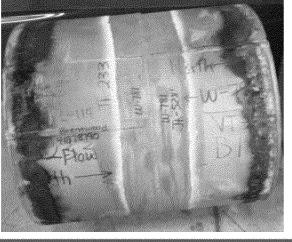
tial - Provided Pursuant to P. U. Code § 583

PG/9E

Weld 781 cited for indications of internal undercut from 44-49 Excised weld photo-documented and ROI aligned with weld features Depth of most severe indications estimated by change in x-ray density



RT <u>estimated</u> depths of up to 0.015 inches Further correlation pursued with 3D surface map



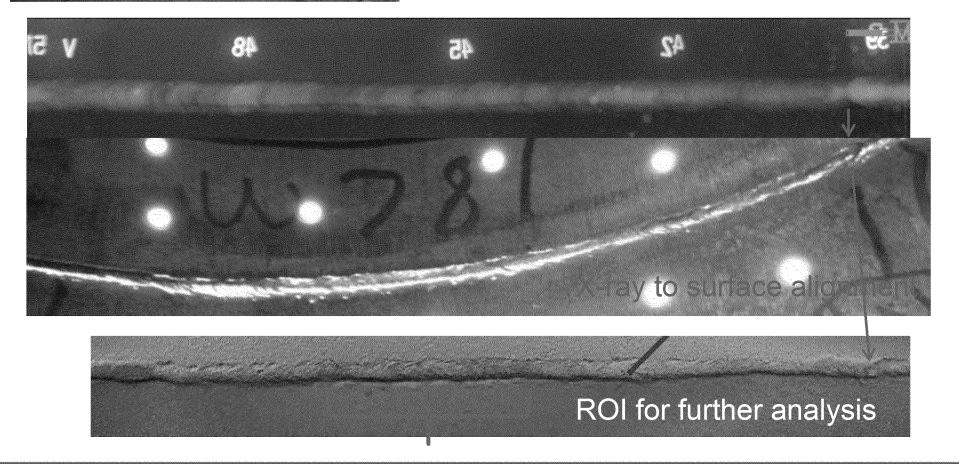


Digital surface profile tool alignment

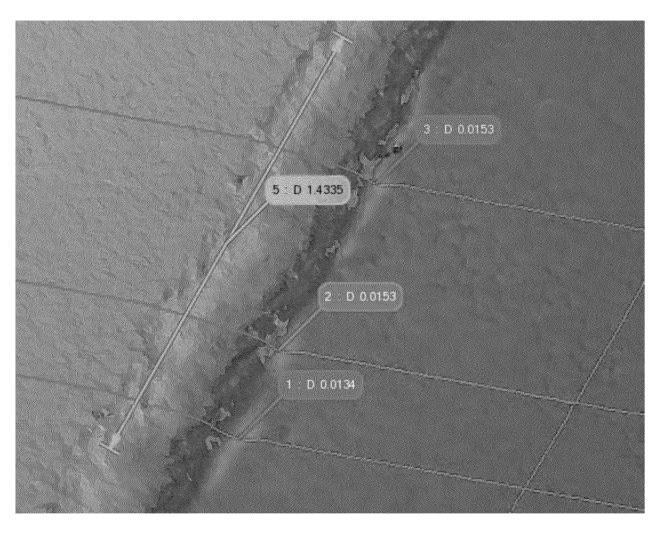


Creaform 3D (+/- 0.002") surface profile:

- Confirms indications are mostly diffraction effects on minor hi/lo condition with 0 UC
 - Largest region is 1.5 long x up to 0.015 inches deep
- Weld is acceptable per API 1104



PR&E

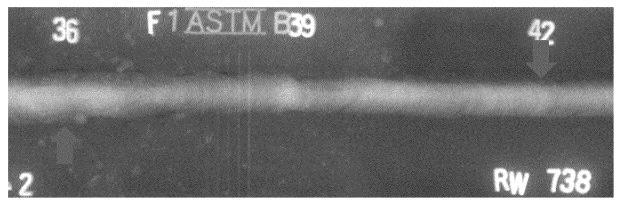


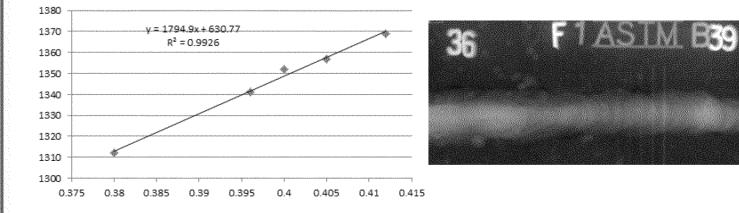
Additional Creaform/Polyworks perspective of ROI 44-49:

- * Confirms UC indication is, in the majority, diffraction/"shadowing" from high/low condition with less than 2 inches of up to 0.015 inches deep IUC
- * Weld is acceptable per API 1104

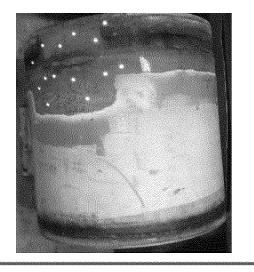
PR/SE

Weld 738 cited for indications of external undercut from 36-42 Excised weld photo-documented and ROI aligned with weld features Depth of most severe indications estimated by change in x-ray density





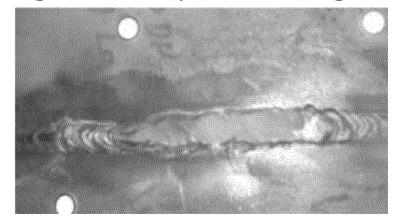
RT <u>estimated</u> depths of up to 0.030 inches Further correlation pursued with 3D surface map



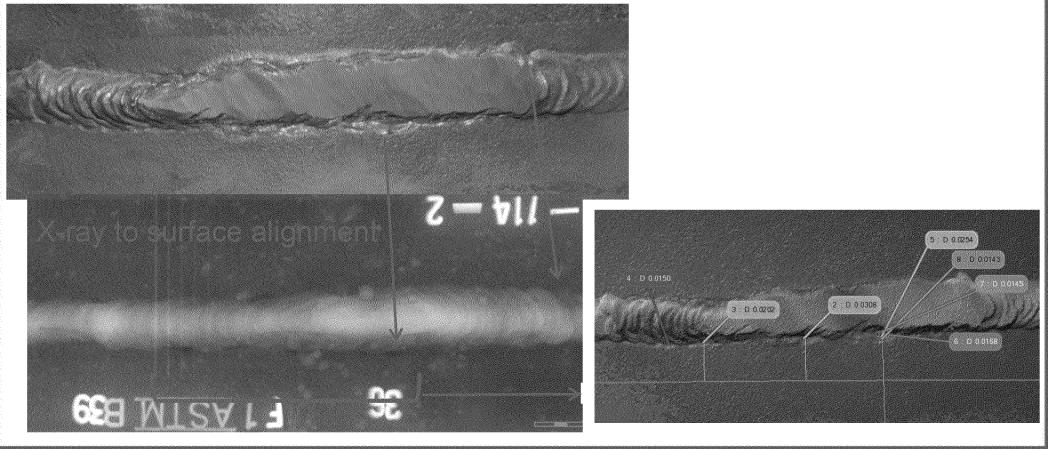
PR&F

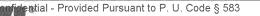


Digital surface profile tool alignment



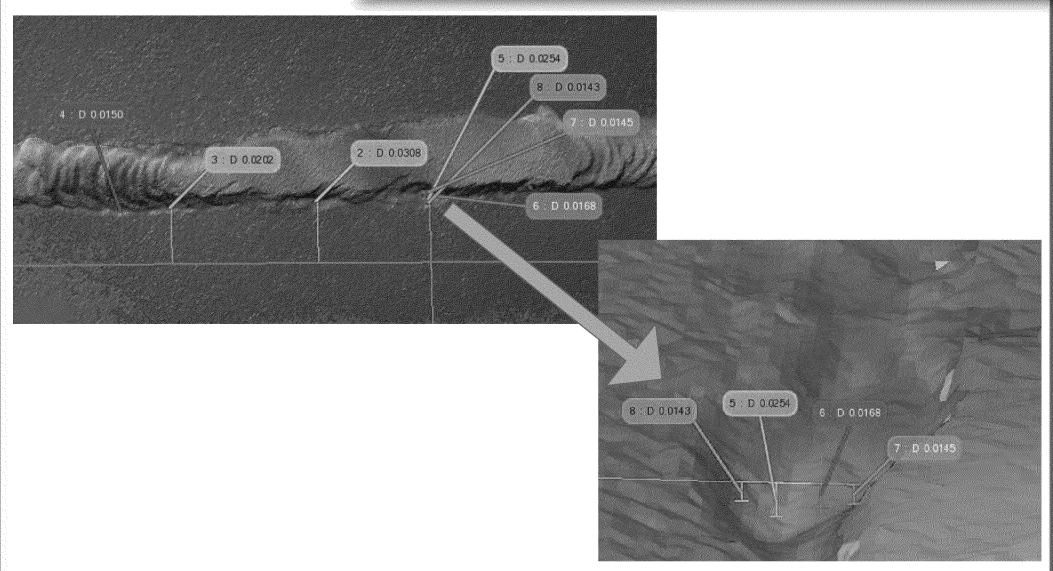
- Creaform 3D (+/- 0.002") surface profile:
 - External undercut identified up to 0.030" deep
 - Sum of UC lengths < 1.5"
 - Weld is acceptable per API 1104





PRÆF

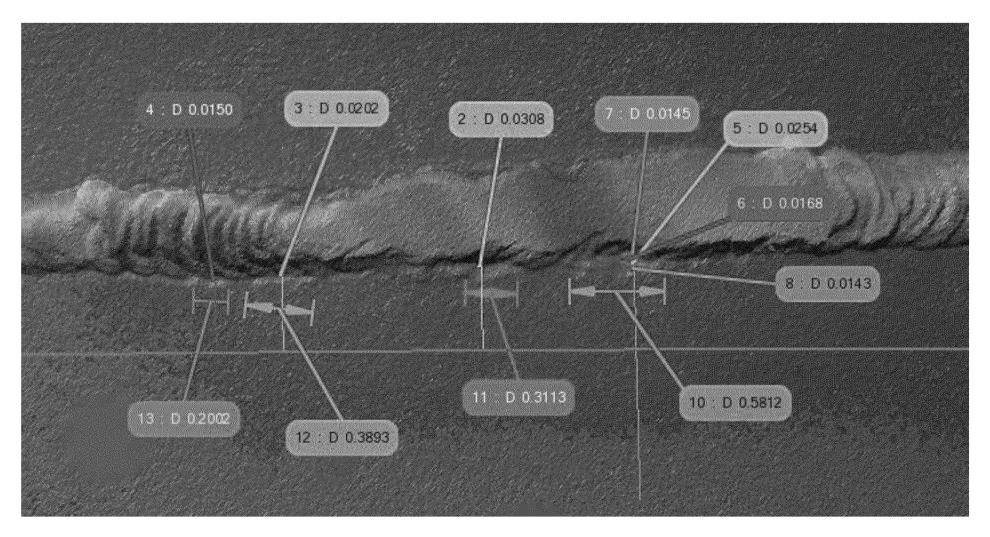
Weld 738 ROI>>36-42 Potential concern: EUC



Additional Creaform/Polyworks perspective of ROI 36-42:

- * EUC noted in several short segments totaling less than 1.5"
- * Weld is acceptable per API 1104

PC/SF



Additional Creaform/Polyworks perspective of ROI 36-42:

- * EUC noted in several short segments totaling less than 1.5"
- * Weld is acceptable per API 1104



APPENDIX II



Phone: (281) 389-4304 E-mail: NDTServices@aol.com

September 30, 2013

Mr.^{Redacted} Pacific Gas and Electric Company PG&E Applied Technology Services 3400 Crow Canyon Road San Ramon, CA 94583



As requested, on Monday, September 30, 2013, as an independent NDT Level III consultant I performed a film review of five welds associated with PG&E Line 114, Job Number 41878790. The following are the results of this review:

- * Weld #738
 - Noted indication at location markers 36 39
 - Indication interpreted to be EU length 1 1/16"
 - Weld acceptable in accordance with API 1104
- * Weld #760
 - Noted indication at location markers 23 27
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition
 - Weld acceptable in accordance with API 1104
- * Weld #770
 - Noted indication at location markers 39 42
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition – length 2 3/8"
 - Weld acceptable in accordance with API 1104
- * Weld # 771
 - Noted indication at location markers 12 24
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition – length 11"
 - Weld acceptable in accordance with API 1104

- * Weld # 781
 - Noted indication at location markers 46 49
 - Indication interpreted to be a shadow at edge of root bead due to a minor highlow condition – length 4"
 - Weld acceptable in accordance with API 1104

Let me know should you require any additional information concerning this film review.

Respectfully,

Redacted

President ASNT Level III – 2820 ACCP Professional Level III

DLC/pac/Letter Concerning Film Review of Five Welds from PG&E Line 114

Redacted cc: Peter Kenny



APPENDIX III



Western Industrial X-ray

1707 Enterprise Dr., Unit F. POBox 238, Fairfield, CA 94533 (707)425-4673 (888) FOR XRAY FAX (707)425-4592

PGE Line 114 JN41878790 - FILM REVIEW

Review performed by Redacted Level II Technician and I Redacted as Radiography Supervisor.

Weld #738
View area 36" to 39".
Possible external undercut, less than 2" in 12"

Weld #760

Area of interest @ 23" to 27". No evidence of indication in adjacent film. It is an obvious field cut and joint preparation. Area of concern is less than 2" in 12" False bevel shadow due to HiLo

The density is consistent throughout indication.

Normally the edge closest to bead would be darker on an undercut indication. Possible cause of the indication could be slight counter bevel during joint preparation.

Weld #770

Indication @ 38.75" to 49.5"

HiLo present

Indication was interpreted as false counter bevel due to field cut and preparation. Density is too consistent across indication to call undercut.

- Weld #771
- Indication @ 12" to 24"

Indication is shadow due to HiLo.

Indication not consistent with normal undercut. These would be the type of indications that you would find if a grinder was applied to the inside of the joint, for example to remove slag after burning which would appear on film as a slight back bevel.

Weld #781

Indication @ 46" to 49". There is no difference in density after shading to call undercut. It is a field prepared joint.

Our interpretation of these areas is that the above listed welds meet the requirements of API 1104.

Regards,

Redacted

Western Industrial X-ray, Inc. Radiography Supervisor