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Sent: 6/9/2014 1:49:43 PM
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Bcc:
Subject: FW: Note from CPUC NDE Meeting 6/6/2014

Liza,

Attached are the notes and documents discussed during our Weekly CPUC/NDE meeting. We had a very good discussion related to the long term remediation of this issue. As always, should there be any questions or concerns, feel free to contact me at any time.

Thank you,

Brian M. Daubin
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*"Never tell people how to do things. Tell them what to do and they will surprise you with their ingenuity."
--George S. Patton, US Army General*

From: Brian M. Daubin [mailto:no-reply@evernote.com]
Sent: Monday, June 09, 2014 1:38 PM
To: Daubin, Brian M
Subject: Note from CPUC NDE Meeting 6/6/2014

Attendees:

Terence Eng

Redacted

Bennie Barnes

Redacted (via phone)

Brian Daubin provided weekly slide deck:

LLNL has completed their review of the 488 Non-Compliant Weld Films

- zero non-compliant in service welds were found
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- All in service welds conform to API 1104
- Due to review of (8) welds that required further study LLNL reports that the issuance of the final report will not be complete until week of June 16th, 2014

Bennie Barnes presented PG&E's compliance plan for the System-Wide remediation of potential NDE Inspection Gaps:

- LLNL has concluded that a system-wide dig plan will not provide conclusions regarding Weld Inspection Compliance
- Redacted (Keifner & Assoc) had the role of providing guidance to LLNL on Pipeline Requirements, and helped develop the framework for the IM approach
- CPUC Citation provides the objective for the system-wide approach
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"risk based"

- Foundation of Proposed Integrity Action Plan (IAP)

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- Systematical approach
- Based upon Risk Mgmt principles
- Long term program

- Input requirements for Plan

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All of the following must exist to apply:

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- > 10" diameter
- > 20% SMYS
- PIR > 100 feet or MAOP > 100psig
- Land movement threat
- HCA

- Mileage totals

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- 2736 miles of post '61 pipe
- of that, 1684 miles are > 10" diameter
- of that, 1543 miles are >20% SMYS
- of that, 1543 miles have PIR > 100 feet or MAOP > 100psig
- of that, 1110 miles are in locations with land movement threat
- of that, 299 miles are within an HCA

Total Miles of proposed program is currently 299 miles

GW verification would rely on the following:

- MFL ILI
- "Opportunistic Digs" (areas being dug through other programs like HydroTesting, ECDA, etc)

Next steps in developing procedures:

- Decision process for selecting assessment method
- Criteria for field investigation

- Repair Criteria
- Plan Performance measures
- Process of reporting out to SED

Terence asked "are risks on page 7 were ranked high to low?"

- These are not in priority. All of the factors would need to be present for the weld to fall within the requirements.

Terence requested criteria to the 5 risk factors. Details to why the criteria was selected, etc.

- Brian Daubin committed to have a "white-paper" developed to explain 5 risk factors

Terence agreed that PG&E was indeed heading in the right direction with this IM approach.

PG&E will continue to work in this direction and build out the requirements of the program. Updates will continue to come to SED throughout the process.

Back to Weekly update:

Brian Daubin reviewed a new list of items completed to date

- PG&E has initiated the engagement of a 3rd Party Expert (Bill Amend with DNV) to evaluate PG&E's IM approach to the System-Wide remediation of potential Weld Inspection Gaps
- LLNL's completion of the 488 non-compliant weld films
- Final response to the BV Report

Brian Daubin presented PG&E's FINAL response to the Bureau Veritas report associated with the review of PG&E's TCI Sample Review:

(File size is too large to send via email)

The key items for PG&E's response are as follows:

- The BV report was conducted by uncertified personnel
- The BV report provides incorrect conclusions based upon current code requirements for Gas Pipeline (API 1104)
- The testing methods of the auditors did not meet the requirements of API 1104
- The report contains factual errors that are not supported by data
- PG&E's findings have been substantiated by 3rd Party consultation
- LLNL found no weld defects in the 488 non-compliant inspections
- NDT Technical Services found no weld defects in any of the welds reviewed by Bureau Veritas

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