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# CPUOMeeting Materials

Weekly Non-Destructive Examination Program Updates

June 6, 2014

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- PG&E/SE Alignment
  - L-114 ✓
  - Extent of Conditions for TCI Inspections
  - NDE Program Enhancements ✓
  - NDE Program Validation Protocols/Extent of Conditions (LLNL)
- Completed Activities To Date
- Next Steps
  - Schedule
  - Immediate Needs



- See presentation dated 3/7/2014 for past items
- Completed all 43 committed digs/re-inspections
- Leak Survey details
  - Leak Survey began on 600 miles of identified Gas Transmission pipeline (12/2/2013)
  - March Leak Survey Finalized
    - Zero leaks found on weld (Girth or Long Seam)
    - Continuing with authorization suspend “monthly” leak surveys
  - LLNL has completed comprehensive review of 488 Welds
    - LLNL has found zero non-compliance welds (per API 1104 20<sup>th</sup> edition)
    - Due to review of final (8) days, LLNL is now reporting <sup>rd</sup> week of June for final report
  - LLNL will provide statistical backed position that a system-wide dig program will not provide desired results of determining weld inspection compliance.

<sup>1</sup>Activity progress/completion is discussed in the Completed Activities To Date section

<sup>2</sup>Dates are contingent on weather, permit, and/or construction schedules



# NDE Program Validation Protocols

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- See presentation from 2/7/2014 for previous notes
  - PG&E working to provide proposal for incorporation of Girth Weld Inspection Gaps into Risk Model (provided there are no findings from TCI Validation):
    - Follows a proven industry model (IM Model)
    - Provides for on-going and continuous threat assessment
    - Provides for traceable/verifiable/complete audit trail (yearly IM Audit)
    - Provides yearly report out on findings (yearly IM Audit)
  - LLNL supports approach
    - LLNL will show that there is no reverse ~~logic~~ relationship between weld quality and weld inspection
    - Best approach is to utilize continual ~~monitoring~~ program to identify potential areas of concern; which in turn will increase risk profile for a given segment
- See PG&E presentation “Plan for addressing noncompliant girth weld inspection system wide” for plan Summary
  - PG&E looking for SED concurrence to move forward with this approach



## Completed Activities to Date

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- See 2/7/14 presentation for items prior to 2/1/14
- Excavated/Tested/Passed 43 welds as of 3/11/14:
- Completed L-114 Final Report
- Created Maps of pipeline segments to be Leak Surveyed as a result of L-114 Findings
- Completed 4 monthly Leak Surveys (Dec, Jan, Feb, Mar) of 600 miles of pipeline
- Completed NDE Program enhancements
  - Implemented for all NDE Contractors as of 4/1/2014
- LLNL has completed review of 488 Non-Compliant welds from TCI
  - Pending final report during week of June 16, 2014
- Framework for long term IM approach completed
- Initiated agreement with Party Reviewer (DNV– Bill Amend) to provide endorsement of PG&EM Plan



# Issuance of PG&E's Response to Bureau Veritas Report

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- PG&E has provided the CPUC SED with its final response to the Bureau Veritas Report issued on March 5, 2014 and May 15, 2014
  - In summary, PG&E concludes the following:
    - The report was conducted by uncertified personnel
    - The 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 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



- High Level activities within the next 6 Weeks
  - See 2/7/14 presentation for prior items:
    - Finalize Comprehensive Analysis of TCI Data Set
      - Establish required digs (3 months)
      - Finalize digs/re-inspections (TBD)
    - LLNL to complete Final Report of TCI non-compliant x-ray films
    - Presentation of IM framework to SED(6/6/14)
    - Revised IM procedures to incorporate “non-compliant weld inspections” into PG&E Integrity Management Risk Model



# Appendix I

Response to "SAMPLE REVIEW of TCI RADIOGRAPHS"  
by Bureau Veritas

See "Review of Bureau Veritas (BV) March 5 & May 15, 2014  
Film Sample Assessment Reports"  
Report 413.61-14.67  
Issued 06/06/2014

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