

PACIFIC GAS AND ELECTRIC COMPANY



**In-Line Inspections
Procedure No. RMP-11**

Integrity Management Program

Rev. 2, June 10, 2008

GTR0003758

PACIFIC GAS AND ELECTRIC COMPANY

CALIFORNIA GAS TRANSMISSION
 GAS SYSTEM MAINTENANCE & TECHNICAL SUPPORT
 SYSTEM INTEGRITY SECTION
 Risk Management



Procedure for In-Line Inspections

Procedure No. RMP-11

Integrity Management Program

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Rev. No.	Date	Description	Prepared By	Reviewed By	Approved
					Manager, System Integrity
0	7-01-04	initial issue	[Redacted]	[Redacted]	[Redacted]
1	10-13-05	Revision 1	[Redacted]	[Redacted]	[Redacted]
2	6-10-08	Revision 2	[Redacted]	[Redacted]	<i>Robert J. Fawcett</i>

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References

1. ANST NO. ILI-PQ-2003 "IN-LINE INSPECTION PERSONNEL QUALIFICATIONS & CERTIFICATION"
2. API 1163 1ST EDITION "IN-LINE INSPECTION SYSTEMS QUALIFICATION STANDARD"
3. NACE RP 0102-2002 "STANDARD RECOMMENDED PRACTICE, IN-LINE INSPECTION OF PIPELINES"
4. ASME B31.8S-2004 "MANAGING SYSTEM INTEGRITY OF GAS PIPELINES"
5. 49 CFR PART 192, SUBPART O "PIPELINE INTEGRITY MANAGEMENT"
6. CGT CLEARANCE PROCEDURE S4420
7. RMP-06 "INTEGRITY MANAGEMENT PROCEDURE"
8. UTILITY WORK PROCEDURE WP4100-06 "SELECTION OF GAS PIPELINE REPAIR METHODS"
9. DCS/IGTS STANDARD S4413 "CPLC AND DOT REPORTABLE INCIDENTS, CURTAILMENTS AND CONDITIONS AND LOW PRESSURE SYSTEM PROBLEM REPORTING"
10. UTILITY WORK PROCEDURE WP4430-07 "ESTABLISHING SET POINTS ON OVERPRESSURE PROTECTION DEVICES"
11. UO GUIDELINE G4413 "PROCEDURE FOR EXCAVATING PIPELINES AND SERVICES"

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1.0 PURPOSE

The purpose of this procedure is to describe the process of performing an In Line Inspection (ILI) on specified buried gas transmission pipeline segments. This procedure is in accordance with 49CFR Part 192, Subpart O – Pipeline Integrity Plan and ASME B31.8S-2001, *Supplement to B31.8 on Managing System Integrity of Gas Pipelines*. It provides instructions, guidance, and requirements to ensure consistent inspections, responses to anomalies and documentation of the ILI results.

1.1 Revision: All changes in the Procedure shall follow RMP-06 Section 12 and be reviewed with all involved personnel whenever a revision is published. In case of conflict between RMP-06 and RMP-11, RMP-06 governs.

2.0 INTRODUCTION

In-Line Inspection requires a structured process that is intended to improve safety by assessing and mitigating the pipeline integrity threats, such as, corrosion, mechanical damage, S.C.C, etc. By identifying and sizing anomalies in the pipeline, the ILI process seeks to proactively prevent anomalies from growing to sizes that are large enough to affect the structural integrity of the pipeline segments inspected.

2.1 ILI Methodology

The ILI methodology is a four-step process that requires the integration of data from the In-Line Inspection, direct pipe surface examinations, and the pipe's physical characteristics. The four steps of the process are:

Pre-Assessment: The Pre-Assessment step collects historic and current data to determine whether the ILI is feasible and what tool is appropriate and to assist in the interpretation and analysis of the inspection results. The types of data to be collected are typically available in GIS, transmission and distribution plat sheets, as-built job files, district and division records. This step also defines the work necessary to verify the pipeline segments are "piggable" or to make the segment "piggable."

In-Line Inspection: The In-Line Inspection step covers the route preparation and pipeline cleaning. This step also includes performing In-Line Inspection runs and the data analysis by the vendor to identify and quantify the pipe wall anomalies.

Direct Examination: The Direct Examination step includes reviewing of In-Line Inspection data to prioritize the anomalies for excavations and evaluations. Data from the direct examinations are utilized to verify the accuracy of the ILI results and evaluate the identified anomalies in regards to pipeline integrity. It also includes requirements of repairs, performing the root cause analysis, and the requirements of the RMP-11 Final Report.

Post-Assessment: The Post-Assessment step covers analyses of data collected from the previous three steps and the development of a Post Assessment Plan to mitigate any significant deficiencies identified by the Root Cause Analysis and the ILI final report. The plan includes assigning re-inspection intervals and assessing/monitoring the overall effectiveness of the ILI process.

2.2 Roles and Responsibilities

Manager of Technical Services: The Manager of Technical Services has the overall responsibility to ensure that this procedure is implemented effectively. This procedure is used to assign approval of documents, plans and exceptions to this procedure. The Manager of Technical Services may delegate some or all of these approving responsibilities.

ILI Program Manager: The ILI Program Manager is responsible for ensuring that all aspects of the ILI program are conducted in full compliance with this procedure. The Program Manager is responsible for overall compliance, budgeting, and resource planning necessary to implement the ILI program.

ILI Engineer (ILE): The ILI Engineer is responsible for the implementation of all engineering aspects of this procedure included in the pre-assessment, in-line inspection, direct examination and post assessment phases.

Senior Risk Management Engineer (SRME): The Senior Risk Management Engineer is responsible for the quality control of the ILI projects. This person will be the consultant to the ILI Team and Integrity Management Team for all ILI projects. This person is responsible for reviewing the critical interim phases and the RMP-11 Final Report for the compliance of this procedure and leads the team creating the Long Term Integrity Management Plan (LTIMP).

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ILI Project Manager (PM): A Project Manager will be assigned to manage each ILI project. This person is responsible for ensuring that all aspects of the assigned ILI project are performed in full compliance with this procedure. In addition, the Project Manager is responsible for effectively planning, documenting and communicating the various aspects and stages of the assigned ILI project. The project is the responsibility of the Project Manager until the final report is completed and formally transmitted to the Integrity Management Program Manager.

Integrity Management Program Manager (IMPM): This person is responsible for ensuring the post assessment is completed for each ILI and the pipeline re-assessment interval is documented and scheduled. This person is also a resource to the ILI Program Manager for risk assessments

Corrosion Engineer (CE): The Corrosion Engineer is responsible for the technical evaluation of direct examinations and preparing root cause analysis in accordance with this procedure.

Direct Examination Personnel: The In-Line Inspection Personnel are responsible for performing direct examinations in accordance with this procedure and other testing procedures that have been referenced in the assessment process.

2.3 Qualification and Training Requirements

The provisions of this procedure shall be applied under the direction of competent persons who, by reason of knowledge of the physical sciences and the principles of engineering and mathematics, acquired by education and related practical experience, are qualified to engage in the practice of pipeline engineering on transmission piping systems. The specific qualifications are described below.

Manager of Technical Services: Qualifications and Training requirements covered in RMP-06

ILI Program Manager: The Program Manager shall be a degreed engineer with a minimum of 5 years of experience (or equivalent) performing In-Line Inspections in the pipeline industry. Additionally, the ILI Program Manager shall have a minimum of 5 years experience in either Pipeline Design, Operations or Integrity Management with a strong working knowledge of CFR 49 Part 192.

Training: 1. Review of RMP-11 annually, 2. RSTRENG Training Course, 3. GT&D Corrosion Control Training Course, 4. Defect Assessment Course and 5. Industry Pigging Course

ILI Engineer (ILE): The ILE shall be a degreed engineer and have a minimum of 1 year experience in Gas Distribution or Gas Transmission Engineering, Planning or Operations. The ILI Engineer shall work under the guidance and supervision of the ILI Program Manager.

Training: 1. Review of RMP-11 annually, 2. RSTRENG Training Course, 3. GT&D Corrosion Control Training Course, 4. Defect Assessment Course and 5. Industry Pigging Course

Sr. Risk Management Engineer (SRME): Qualifications and Training requirements covered in RMP-06

ILI Project Manager (PM): The PM shall have project management experience within the gas industry.

Training: 1. Review of RMP-11 annually, 2. Project Manager Training per PG&E Project Manager Guidelines.

Integrity Management Program Manager (IMPM): Qualifications and Training requirements covered in RMP-06

Corrosion Engineer (CE): Qualifications and Training requirements covered in RMP-06

Direct Examination Personnel: The personnel performing the direct examinations shall meet their employer's Operator Qualification requirements as well as being certified with supporting training documentation for the specific inspections they are conducting.

2.4 Record Retention: All forms and reports created for the ILI run shall be on file for the life of the facility.

2.5 Definitions: The following are definitions of some key terms used in this procedure

Shall: Is a requirement that must be complied with or its exception approved and documented in accordance with Section 7.0 of this procedure.

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Should: Is a recommendation that is desirable to follow if possible. Not following the recommendation does not have to be documented or approved.

Required: "Required" data listed in Table 3.3.1 must be obtained for an effective ILI project or its omission be approved and documented in accordance with Section 3.7 of this procedure.

Desired: "Desired" data listed in Table 3.3.1 should be obtained if it is documented or easily measured. Its omission is not required to be approved or documented.

Considered: "Considered" is a recommendation that a data element is taken into account for the selection of In-Line Inspection tools, interpretation, or analysis of test results.

Failure Pressure (Pf): Calculated burst pressure from of an ILI anomaly using RSTRENG or equivalent method.

Failure Pressure* (Pf*): Calculated burst pressure of an ILI anomaly including tool tolerances.

Discovery Pressure (Pdis): Pdis is defined as the pipeline pressure at the time the condition was discovered and for the purpose of this procedure we will use the highest pipeline operating pressure during the in-line inspection tool ILI run or the maximum operating pressure between the ILI run and the time of discovery.

Safe Pressure (Ps): $P_f \times (f/mcs)$ class location design factor

GIS: Geographic Information System. The computerized graphics and database used to store the location, specifications, and integrity assessment of all pipeline facilities.

GPS: Global Positioning System. Process by which coordinates are captured for mapping purposes.

AGM: Above Ground Marker. Used for tracking ILI tool while traveling through pipe

CPA: Cathodic Protection Area

MAOP: Maximum allowable operating pressure for a section of pipeline between pressure controlling points. This is often determined by the "weakest" link of segments, fitting or valve between the pressure controlling points.

Discovery: When PG&E receives actionable information on anomalies which have been reviewed by an ILI analyst.

Pipeline Features List: A list detailing the various features of a pipeline, such as, pipe specifications, valves, tees, bends, etc. per PG&E records such as: Pipeline Survey Sheets, Plats, As-built drawings, Project files, etc.

3.0 PRE-ASSESSMENT

3.1 Objectives

The objectives of the pre-assessment process are to:

- Determine the feasibility of conducting an ILI
- Determine if sufficient data exists to conduct an ILI
- Collect the required pipeline data to assist in the interpretation and analysis of inspection results
- Document pre-assessment results

3.2 Pipeline Segments Requiring ILI

3.2.1 Identification of ILI Projects: Pipeline segments needing or requiring an ILI can be identified from multiple sources (IMAC, BAP, HMA). Usually the requests for an ILI will come from the Integrity Management or Risk Management Programs. However, the company may utilize ILI for other business or operating initiatives. This procedure does not address the identification or ranking processes of pipeline segments requiring ILI. Please refer to RMP-06 for details.

3.2.2 Information Provided With ILI Request: The request for an ILI shall have the following information supplied to the ILI Program Manager:

- Route number

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- Starting and ending mile points of requested ILI
- Risk Ranking
- Location of HCA, if present, within the ILI project mile points (starting and ending)

3.3 Data Collection (Pre-Field Visit)

- 3.3.1 Data Collection Objectives:** A key aspect of the Pre-assessment step is the collection of pipeline data. Table 3.3.1 PRE-ASSESSMENT DATA provides a checklist of the data elements needed to conduct the ILI.
- 3.3.2 Data Collection Phases:** Data collection and analysis is a continuous activity throughout the ILI process. In the Pre-assessment step this procedure divides the data collection into two steps; "Pre-Field Data Collection" and "Field Data Collection."
- 3.3.3 Data Requirements:** The "Need" for the data elements is identified in Table 3.3.1 as either "REQUIRED" or "DESIRED." Data elements that are identified as REQUIRED shall be obtained before completion of the Pre-assessment step or approved to be delayed or omitted from data collection in accordance with Section 3.7 of this procedure. "DESIRED" data elements should be obtained if the data is available in existing records or can be obtained from easily conducted measurements or examinations. The Program Manager may consider desired data sufficiently important to classify it as "REQUIRED" for a specific ILI analysis.
- 3.3.4 Data Sources:** Table 3.3.1 provides guidance to the possible sources for each data element. If the data element is not available in the listed sources the ILI Engineer should use good judgment on seeking the data elsewhere. A pipeline features list shall be compiled to identify all information about the pipeline such as: pipe wall thickness, grade, seam, fittings, valves, etc. for this purpose.
- 3.3.5 Data Documentation:** The collection of information shall be indicated on the "DATA ELEMENT CHECK SHEET" (Form A). Items should be signed off by the person who checked/filled the specific data element row.

TABLE 3.3.1: PRE-ASSESSMENT DATA LIST

ID #	Data Element Description	Description	Requirements				Data Source				Comments
			Need	Inspection Tool	Interpretation of Results	GIS	As-built Job file	Field	District or Division	Other	
1.0 Pipe Related											
1.1	Diameter	May reduce detection capability or prohibit passage of tool	R	R	R	X	X				
1.2	Wall thickness	May reduce detection capability or prohibit passage of tool	R	R	R	X	X				
1.3	Grade		R	N/R	R	X	X				
1.4	Seam Type		D	N/R	C	X	X				
1.5	Year Manufactured	May influence tool selection.	D	N/R	C	X	X				Assume the same year as installed unless found otherwise.
2.0 Construction Related											
2.1	Year installed		D	N/R	C	X	X				
2.2	Recent route changes/modifications that may not be in GIS		D	C	N/R	X	X	X			
2.3	Construction practices		D	C	C	X	X				Engr. Sites drawings
2.4	Location of major pipe appurtenances such as valves and tees	Investigate potential need for replacement or the installation of bars for tees.	R	R	C	X	X	X			

1 R = Required, D = Desired (See paragraph 2.5 for definitions)
 2 R = Required, C = Considered, N/R = Not required

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ID #	Data Element Description	Description	Interpretation and Analysis Of Inspection Results	Requirements				Data Source				Comments
				Need	Inspection Tool	Interpretation of Inspection Results	GIS	As-built job file	Field	Districts or Division	Other	
2.5	Location of bends, including miter bends and wrinkle bends	May indicate locations at which replacements are needed to make the pipeline playable	Provides a 'known' reference for geo-referencing indications	R	R	C		X			Trans. Plat Sheet	
2.6	Location of casings		Provides a 'known' reference for geo-referencing indications (Access issue for post pigging dig and potential coating defect)	D	N/R	C		X	X			
2.7	Proximity to other pipeline structures, HV electric transmission lines and rail crossings		Possible CP interference and 3 rd party damage	D	C	C	X		X			
2.8	Underwater sections and river crossings		Access issue for post pigging dig and potential coating defect	C	N/R	C	X	X				
2.9	Location of bores		Access issue for post pigging dig and potential coating defect	D	N/R	C		X				
3.0 Soils/Environmental												
3.1	Soil characteristics & types		Can be useful in interpreting results. Influences corrosion rate	D	C	C	X		X		Form 411D	GIS soil data
3.2	Assessment of environmental conditions		May indicate potential environmentally sensitive areas	D	N/R	C	X		X			
3.3	Topography		Conditions such as rocky areas can make field inspections difficult or impossible.	D	C	N/R			X			
3.4	Land use (current/past)		Can be considered in evaluating the potential severity of damage.	D	C	C	X		X			Asphalt vs. concrete
3.5	Locations of poor drainage		Influences corrosion rate and remaining life calculation	D	N/R	C			X	X		
4.0 External Corrosion												
4.1	CP System Type (anodes, rectifiers, and locations)		Support root cause analysis and CIS survey	D	N/R	C			X		CPA Records	
4.2	CP system boundaries		Support root cause analysis and CIS survey	D	N/R	C			X	X	CPA Records	
4.3	Locations of Isolation Points		Support root cause analysis and CIS survey	D	N/R	C			X	X	CPA Records	

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ID #	Data Element Description	Description	Requirements			Data Source				Comments
			Need	Inspection Tool	Interpretation and Analysis of Results	GIS	As-built Job file	Field	District or Division	
4.4	Locations of Connections to Distribution	In-Line Inspection Tool Selection	D	N/R	C		X	X	CPA Records	
4.5	Stray Current sources/locations		D	N/R	C		X	X	CPA Records, past survey reports	
4.6	Test point locations (pipe access points)		D	N/R	C	X	X	X	CPA Records	
4.7	CP evaluation criteria		D	N/R	C				CPA Records, Paradigm	
4.8	CP maintenance history		D	N/R	C			X	CPA Records, Paradigm	
4.9	Years without CP applied		D	N/R	C		X	X	CPA Records, Paradigm	
4.10	Coating type - pipcc		D	N/R	C	X	X			
4.11	Coating Condition		D	N/R	C	X		X	Direct Assessment	
4.12	Current demand		D	N/R	C			X	CPA Reports	
4.13	CP survey data/history		D	N/R	C				CPA Records, Paradigm, Corrosion Group	
5.0 Operational Data										
5.1	Operating stress level Pressure, Flow Rate	For controlling the pigging velocity	R	R	R	X				GSO, TSP
5.2	Monitoring programs (Patrol leak surveys etc.)	May impact repair, remediation and replacement schedules.	D	N/R	C					Corrosion Group, Form 4110
5.3	Pipe inspection reports- excavation	Provide useful data for post assessment analysis or data verification	D	N/R	C	X		X		Form 4110

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ID #	Description		Requirements		Data Source				Comments		
	Data Element Description	In-Line Inspection Tool Selection	Need	Inspection Tool	Interpretation and Analysis of Results	GIS	As-built Jobfile	Field		Districts of Division	Other
5.4	Repair history/records, steel/composite repair sleeves, repair locations	Interpretation and Analysis Of Inspection Results	D	N/R	C	X		X	X	Form 4110	
5.5	Leak rupture history	Interpretation and Analysis Of Inspection Results	D	N/R	C	X		X	X	Form 4110	
5.6	Type and frequency of third party damage (Review constructor activities with operating personnel)	Interpretation and Analysis Of Inspection Results	R	N/R	R	X	X	X	X	Form 4110 USA Data Base Patrol Records	
5.7	Other prior integrity related activities: C.S, ILL runs, etc.	Interpretation and Analysis Of Inspection Results	R	N/R	R	X				Corrosion Group, System Integrity	If applicable
5.8	Hydro Test dates/pressures	Interpretation and Analysis Of Inspection Results	D	N/R	C	X	X				
5.9	Known areas of shallow cover.	Interpretation and Analysis Of Inspection Results	D	N/R	C		X	X			
5.10	Location of abnormal pipe operating temperatures	Interpretation and Analysis Of Inspection Results	D	N/R	C					SCADA	
6.0 Internal Corrosion (IC)											
6.1	History of IC leaks	Influence post pigging dig plan	D	C	C	X		X	X		Pipe inspection form
6.2	Received gas from gathering or storage lines	To establish threat for potential IC; Influence post pigging dig plan	D	N/R	D	X		X			
6.3	Drip location	Influence post pigging dig plan	D	N/R	C	X		X			Check dr p logs, PLM
6.4	Drip fluid analysis	Influence post pigging dig plan	D	D	D	X		X	X		
6.5	Inhibitor injection	Influence post pigging dig plan	D	D	D	X		X	X		Check drip logs, PLM
6.6	Previously "pigged"	Influence post pigging dig plan	D	N/R	C				X		Previous cleaning pigs

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ID #		Data Element Description	Description	Requirements			Data Source				Comments	
				Need	Inspection Tool?	Interpretation and Analysis of Inspection Results?	GIS	As-built/Job file	Field	Division	Other	
0.7		Corrosion monitoring (LPR probes, weight loss coupons, corrosionmeter probes, etc.)	In-Line Inspection Tool Selection			Interpretation and Analysis of Inspection Results				X	Maintenance Records	
7.0 Hard Spot												
7.1		Year installed, Mill, Seam type, etc per RMP-05 Section 3.5	Will affect tool selection	D	C	C	X	X				
7.2		Records of hard spots failures	Will affect tool selection	D	C	C	X				Form 4110	
7.3		Abnormal CP levels		D	C	C	X			X		

3.4 Data Analysis (Pre-field visit)

3.4.1 **Identification of Missing Data:** Once the Pre-field Visit data is collected the ILI Engineer should analyze the data to identify missing elements, and develop a list of data that will need to be obtained in the field. Form A - DATA ELEMENT CHECK SHEET in APPENDIX A can be used for this purpose.

3.5 Field Visit

3.5.1 **General Description:** Examining the physical locations where the ILI is to be conducted is a key activity in the gathering of data. It is important to collect as much data as possible to achieve the objectives of the Pre-assessment and effectively plan for the In-Line Inspection step of the ILI process. Hence, preparation is key to conducting an effective field visit. Some of the data elements from Table 3.3.1 that may require field collection or verification in the field are:

TABLE 3.5.1: TYPICAL FIELD COLLECTED DATA

ID	Description	ID	Description
2.2	Recent route changes/modifications that may not be in GIS	3.2	Assessment of environmental conditions
2.4	Presence of major pipe appurtenances such as valves and tees	4.1	CP system type (anodes, rectifiers, and locations)
2.6	Presence of casings	4.2	Stray Current source/locations
2.7	Proximity to other pipeline structures, HV electric transmission lines and rail crossings	4.3	Test point locations (pipe access points)
3.1	Soil characteristics & types	5.8	Type and frequency of third party damage (Review construction activities with operating personnel)

3.5.2 **Documentation:** All data collected in the field that will be used in the ILI project shall also be included on Form A.

3.6 **Data Filing:** Data collected during pre-assessment phase shall be stored in the final report per Section 5.9.

3.7 **Data Analysis** Once the Field Visit data is collected the ILI Engineer shall analyze the data to identify missing REQUIRED data elements, and conduct a SUFFICIENT DATA ANALYSIS – FORM B.

3.7.1 **Sufficient Data Analysis:** The data shall be analyzed to determine if there is sufficient data to conduct an ILI. The analysis should include the following:

- **Missing Required Data:** If there is missing required data and it is felt that this data is not essential to the ILI then the reason it is not necessary shall be explained in Form B - SUFFICIENT DATA ANALYSIS FORM.
- **Missing Desired Data:** The ILI Engineer should review the missing desired data to identify if any of those data elements are essential to

conduct the ILI. If some of the missing desired data is essential it should be identified in the analysis and document on Form B.

3.7.2 Documentation: The ILI Engineer shall document if there is sufficient data to conduct an ILI. Form B - SUFFICIENT DATA ANALYSIS FORM can be used for this purpose.

3.8 Feasibility Analysis

3.8.1 Analysis: The ILI Team shall integrate and analyze the data collected on the pipeline segments and determine whether the use of ILI is appropriate. The framework for this analysis is that the Program Manager shall examine the existing data in each of the five categories in Table 3.3.1 (Form A) and assess the following:

- **In-Line Inspection:** In-Line Inspection should address physical, operational and economic considerations.
- **Direct Examination:** Direct Examination should address physical, operational and economic considerations.

3.8.2 Documentation: The ILI Engineer shall prepare Form C - FEASIBILITY ANALYSIS FORM and have it approved by the ILI Program Manager.

3.9 ILI Pre-Assessment Review Meeting(s)

3.9.1 Purpose: The ILI Project Manager shall conduct a meeting(s) to review the pre-assessment results, communicate the plan of how the ILI will be conducted, and build consensus for the plan.

3.9.2 Agenda: The meeting(s) should have the following in its agenda:

- Review the ILI Request information, DATA ELEMENT CHECK SHEET (Form A), SUFFICIENT DATA ANALYSIS FORM (Form B), and FEASIBILITY ANALYSIS FORM (Form C)
- GIS Maps
- Discussion of required pipeline modifications

3.9.3 Attendees: The meeting(s) may have the following attendees:

- Project Manager
- ILI Program Manager
- Manager of Technical Services or Pipeline Engineering
- ILI Technical Consultant
- Senior Corrosion Engineer
- Pipeline Engineer of the area
- Crew member familiar with the pipeline
- ILI Engineer
- Estimator

3.9.4 Changes: Changes agreed upon in the meeting(s) should be documented on the Pre-assessments forms.

3.10 Pre-assessment Report

3.10.1 Report: The report shall have the following data and have been incorporated with the changes from the Pre-assessment meeting described in paragraph 3.9. All required forms shall be signed and dated by the ILI Program Manager.

- ILI Request Information
- GIS Maps

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- DATA ELEMENT CHECK SHEET (Form A)
- SUFFICIENT DATA ANALYSIS FORM (Form B)
- FEASIBILITY ANALYSIS FORM (Form C)
- Scope of work to modify pipeline, if applicable
- The proposed inspection tool requirements

3.10.2 Review, Approval and Filing: The report shall be reviewed and approved by the ILI Program Manager. A copy shall then be kept in the project file.

3.11 Pipeline Retrofit

3.11.1 Purpose: The step is to do necessary physical modification to make the pipeline piggable and install launcher and receiver.

3.11.2 Retrofit Plan: The ILI Program Manager shall prepare a plan including funding, resource, engineering design and construction for the retrofit. The retrofit phase of a pipeline to be pigged for the first time may take more than a year to complete.

4.0 IN-LINE INSPECTION

4.1 Objectives: The objectives of the In-Line Inspection process are to:
Clean the pipeline adequately for inspection
Geometrically inspect the pipeline for dents or other geometric anomalies
Inspect the pipeline for corrosion or other metal loss anomalies
Map the pipeline to assure correct alignment and ability to locate anomalies
Obtain ILI vendor report that will locate and quantify the severity of damage to the pipe wall and identify other anomalies

4.2 Selection and Marking of Above-Ground Markers (AGM)

4.2.1 Objective: Prior to conducting an In-Line Inspection, the location of above ground markers shall be identified in the field and centimeter accuracy GPS coordinates obtained for these locations along with the depth of cover. A minimum of one AGM should be established approximately every mile. Markers shall be established in the field to identify the physical location of the AGMs. GIS themes shall be created for all AGMs and stored in GIS.

4.2.2 Type of AGMs: AGMs can be established every mile by utilizing one of the following:

4.2.2.1 Significant bends, taps, valves, above ground crossings, wall thickness changes or the start of casings that can be accurately located in the field

4.2.2.2 Pre-selected GPS locations for "pig trackers"

4.2.3 Documentation: The location and method of marking shall be indicated on the IN-LINE INSPECTION ABOVE GROUND MARKER LOCATIONS form (Form D)

4.3 Preparation for In-Line Inspections

4.3.1 Specifications:

4.3.1.1 Each ILI Project shall have a written specification prepared for cleaning. These specifications shall provide adequate information

to ensure the pipeline is cleaned to meet the ILIT inspection requirements.

4.3.1.2 Each ILI Project shall have a written specification prepared for ILI. This specification shall provide adequate information to ensure the vendor's inspection results meet the integrity assessment requirements. As a minimum the specification shall include the following:

- **Safety:** The vendor shall meet PG&E's specified minimum requirements.
- **Sizing Accuracy:** The required anomaly sizing shall be specified to determine an acceptable inspection. Allowable exceptions to the accuracy may be specified to account for short distances of speed excursions, etc.
- **Calliper Accuracy:** The required anomaly sizing shall be specified to determine an acceptable inspection. Inspection shall be performed to collect data on dents, ovalities, or other geometric features that impact the integrity of the pipeline.
- **Geospatial Accuracy:** Where practical, in addition to collecting the data about the condition of the pipe wall, all In-Line Inspections will also collect geospatial information throughout the survey. The geospatial information should enable the coordinate location of all anomalies, pipe joints, the location of all pipeline appurtenances, and the accurate development of the pipeline profile. The aboveground markers will be used to georeference the data to a horizontal accuracy of +/- 3'.
- **Operator Qualifications:** Documentation needed to verify the competency of the vendor personnel who calibrate and operate the ILIT and analyze the data, including required training and testing. (ASNT No. ILI-PQ-2003)
- **Schedule:** Required Immediate repair anomaly report as they are identified and 90-day response time for final report.
- **Report Format:** Data required in Immediate repair anomaly report, final report, and the data format.

4.3.2 Contract:

- PG&E shall follow existing corporate contracting guidelines, including sending out a request for proposal to qualified cleaning and inspection vendors, evaluating bids and contracting for cleaning, inspection and mapping of the pipeline.
- **Vendor Qualification:** A PG&E ILI Team shall review and approve the vendor's qualification noting any exceptions to the minimum requirements (Form E).

4.3.3 In-Line Inspection Plan Review: The Project Manager shall assemble and submit an In-Line Inspection Plan to the ILI Program Manager for review.

4.3.3.1 Plan contents: The plan shall have the following documents:

- In-Line Inspection Above Ground Marker Location Form (Form D)

- ILI Vendor Qualification Form (Form E)
- ILI Specification(s)
- ILI Contract
- Schedule

4.4 In-Line Inspection Field Operations

- 4.4.1 In-Line Inspection Field Meeting:** The Project Manager shall conduct a field meeting with the ILI vendor and the personnel supporting the inspection. At this meeting they should cover the following while referring to the ILI Contract, GIS Maps as well as other documents prior to the inspection run:
- **ILI Access:** View the launch and receipt points for the ILI.
 - **ILI Procedure:** Review contractor's process and clarify the support PG&E will provide during the run.
 - **Access to Above Ground Markers (AGM):** Ensure the contractor is familiar with accessing each (AGM) and has the maps necessary to return to those locations.
 - **Tracking:** Review which party is responsible for pig tracking.
 - **Schedule:** What exact dates and times the vendor will conduct the inspection.
 - **Landowner Contact:** Provide Landowner notification information that will be sent to properties that will be accessed by PG&E or Contractor personnel. Also discuss protocol if landowners question field personnel.
 - **Safety and Environmental Hazards:** Discuss safety hazards, such as traffic, overhead lines, rectifier potentials, flora and fauna and other environmental concerns.
 - **Notification Procedure:** The vendor shall notify the Project Manager when abnormal conditions or situations develop.
- 4.4.2 Operation Safety:** PG&E shall follow all existing CGT Clearance Procedure S4420 requirements in launching, running and receiving pigs. These procedures detail clearance points, use man-on-line tags, etc.
- 4.4.3 Contamination Prevention:** PG&E shall develop and implement a plan to collect and remove debris generated from cleaning and inspection operations and to minimize debris spreading to off-line taps and downstream customers on the pipeline. This plan may require the installation of filters and/or separators at receiver location or at major off-line taps. It may also require that taps be closed for the duration of the pigging project or pig run or temporarily closed during pig passage.
- 4.4.4 Customer Service:** PG&E shall develop and implement a plan to accommodate customers being fed from pipeline to the extent reasonable and practical. These options may include temporary shutdown, back feed, cross tie or alternative gas supply via CNG or LNG.
- 4.4.5 Pig Tracking:** PG&E shall track all pigs which are run in the pipeline at spacing intervals adequate to ensure that pigs are operating within velocity parameters of cleaning or inspection requirements and to maintain the

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ability to locate the pig within the pipeline should it become lodged or damaged.

- 4.4.6 **Vendor Performance:** The In-Line Inspections shall be performed strictly in accordance with the approved specification. Any significant deviation from the specification shall be approved and documented in the EXCEPTION PROCESS (Form M) of this procedure described in Section 7.
- 4.4.7 **Verification of ILI Quality:** Prior to leaving the site, the ILI contractor shall verify that the run was of sufficient quality to ensure meaningful data about the anomalies and to meet the sizing accuracy and the geospatial requirements. The Project Manager should document variances and PG&E's acceptance of these variances.
- 4.4.8 **Liquid Collection:** Collect liquid sample at the pig receiver per GS&S O-16 Attachment 2 for each pigging project. The liquid sample is needed for testing IC.

5.0 DIRECT EXAMINATION

For a typical Direct Examination Process see the flow chart shown in Attachment A.

- 5.1 **Objective:** The objective of the Direct Examination phase is to:
 - Gather data to validate the ILI Vendor's Report
 - Verify the pipeline's integrity
 - Perform necessary repairs
 - Restore the pipeline's MACP, if required
 - Determine the root cause of corrosion or damage
 - Complete an ILI Project Report
- 5.2 **Immediate Anomaly Discovery and Final ILI Vendor Report:** The contractor shall notify PG&E immediately when anomalies that are described by CFR 49, Part 192, Section O, as "Immediate repair conditions" are identified (Table 5.5.1). The date of discovery of an "Immediate" anomaly shall be considered either the notification date of "Immediate" anomalies or the receipt of the Final ILI Vendor Report. No later than 180 days after the date of the successful final ILI run, the ILI contractor shall submit a final report. The final report shall integrate the geometry, metal loss, and any other ILI tools used, addressing internal corrosion, external corrosion and mechanical damage per the ILI specification.
- 5.3 **Pressure Reduction Review Process:** As soon as possible but not exceeding 5 calendar days of receipt of the immediate anomalies report, the ILI engineer shall review the anomalies and take proper action to ensure pipeline safety according to the following steps:
 - 5.3.1 **Create a list of "Immediate" anomalies:** The ILI engineer shall review the immediate anomalies reported by the ILI contractor and document them on Form F. This Form shall be completed even though there are no Immediate anomalies.
 - 5.3.2 **Verify pipe specifications and re-assess each anomaly on Form F:** The ILI engineer shall determine the approximate location of each "Immediate" anomaly and shall determine the HCAs and identify the relative consequences (class location, structures, etc.) in the vicinity of the anomaly, determine the actual pipe specifications and use RSTRENG or equivalent effective area method to assess the ILI tool Pf. Record the highest Pf value from RSTRENG or equivalent effective area method

calculation of each anomaly and prioritize the anomalies on Form F. If there are no "Immediate" anomalies remaining on the list, proceed to Section 5.5.

5.3.3 Pressure Reduction: If there are any "Immediate" anomalies left on Form F after assessment of Pf, immediately reduce the operating pressure according to the following steps:

5.3.3.1 Determine Pdiscovery (Pdis): Pdis is defined as the pipeline pressure at the time the condition was discovered and for the purpose of this procedure the highest pipeline operating pressure during the ILI run or the highest operating pressure either between the ILI run and the time the immediate anomalies are identified will be used. This pressure shall be recorded on Form F. (Note: It is not appropriate to spike the operating pressure prior to making a definitive call on immediates.)

5.3.3.2 Pressure Reduction Limits:

- If there are any non-corrosion anomalies with metal loss or corrosion anomaly with metal loss greater than 80% of the wall thickness on Form F, the operating pressure shall be reduced to 80% of Pdis and proceed with Section 5.3.4.
- For remaining corrosion anomalies on Form F proceed with the following; calculate Ps by multiplying the Pf value by the class location design factor and record the pressure on Form F. The operating pressure shall be reduced to the highest of 80% of Pdis or the lowest Ps of all the anomalies.

5.3.4 Operational/Pressure Change Notification: If operational or pressure changes are required, the ILI Program Manager shall notify the GT&D GE Director, the Pipeline Engineering Manager and the Technical Services Manager. He shall communicate and document all required operational/pressure changes including over pressure protection system (Utility Work Procedure WP1430-07) and alarm settings to Gas System Operations (GSO) on Form F.

5.3.5 Operational/Pressure Change Implementation: GSO shall execute and order the required changes and the responsible superintendent shall ensure that the changes executed by GSO are implemented immediately. The ILI Engineer shall review UO Standard 4413 to determine if additional reporting is required to the CPUC/OPS (e.g. A Safety Related Condition report should be filed in accordance with that standard if pipeline pressure must be reduced by 20% or more due to damage found and there is a structure within 660 feet of the damage location). The documentation of pressure reduction and resetting alarm settings implementation shall be kept in file, including Gas Log System (GLS) record.

5.3.6 Inability of Reducing Pressure: When pressure reduction is not feasible, PM shall file an exception report and notify CPUC/OPS per Section 7 of this Procedure.

5.3.7 Extension of Pressure Reduction Time Limit: When it is required to maintain pressure reduction time exceeds 365 days, the ILI engineer shall write a technical justification of no jeopardy to public safety and file it in the final ILI report and follow exception process per Section 7 of this procedure.

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- 5.4 Immediate Anomaly Inspection/Repair Plan :** If the pressure of the pipeline needs to be restored prior to the receipt and verification of the Final ILI Report, the ILI Engineer shall prepare and submit Form G - Anomaly Prioritization and Direct Examination Form (Inspection/Repair Plan) to the ILI Program Manager and the Manager of Technical Services.
- 5.4.1 Field Inspection:** The Project Manager is responsible for all project management aspects of implementing the Inspection/Repair Plan. See Section 5.5, for details.
- 5.4.2 Root Cause Analysis:** The ILI Engineer shall ensure all data are collected to support the Root Cause Analysis. (See Section 5.8)
- 5.4.3 Operational/Pressure Change Concurrence:** After all immediate anomalies are inspected/repared; the ILI Program Manager shall evaluate the repairs and determine the timing of restoring the MAOP. He shall then gain concurrence from the GSM&TS Manager of Pipeline Engineering and the Manager of Technical Services to restore the MAOP, communicate and document all required operational/pressure changes to Gas System Operations (GSO).
- 5.4.4 Operational/Pressure Change:** GSO shall execute and order the required changes and the responsible district superintendent shall ensure that the changes executed by GSO are implemented per Utility Work Procedure WP4430-07.
- 5.5 Inspection/Repair Plan :** Within 90 days of receipt of the final report, the ILI Engineer shall prepare an inspection plan and submit to the ILI Program Manager and the Manager of Technical Services. The inspection plan shall be documented on Form G. In developing the inspection plan the tool tolerances per RMP File 7.11 (PG&E White Paper on Pf^a Calculations Using ILI Data) shall be added to the anomalies for the Pf^a calculations
- 5.5.1 Prioritization of Anomalies:** For each In-Line Inspection, the anomalies shall be prioritized following the criteria in Table 5.5.1. All anomalies prioritized, as Immediate, Scheduled-one year and scheduled-other, shall be recorded on Form G.

Table 5.5.1 In-Line Inspection Tool Anomaly and Direct Anomaly Prioritization Guide

%SMYS at MAOP	Immediate	Scheduled – One Year	Scheduled - Other	Monitored
At or above 50%	<ul style="list-style-type: none"> Pf/MAOP ≤ 1.1 Dents with metal loss, cracks or a stress riser PG&E's judgment SCC Metal loss affecting long seam formed by direct current, low frequency ERW or electric flash welding. Metal Loss > 50% W.T. 	<ul style="list-style-type: none"> A smooth dent with depth greater than 6% (0.5" in depth dent for less than 12" diameter pipe) A smooth dent with depth greater than 2% (0.25" in depth dent for less than 12" diameter pipe) that affects girth weld or long seam 	<ul style="list-style-type: none"> Pf/MAOP ≤ 1.39 PG&E's Judgment 	<ul style="list-style-type: none"> All scheduled dents that engineering analyses demonstrate critical strain levels are not exceeded and left in place
30% to 50%	<ul style="list-style-type: none"> Pf/MAOP ≤ 1.1 Dents with metal loss, cracks or a stress riser PG&E's judgment SCC Metal loss affecting long seam formed by direct current, low frequency ERW or electric flash welding. Metal Loss > 80% W.T. 	<ul style="list-style-type: none"> A smooth dent with depth greater than 6% (0.5" in depth dent for less than 12" diameter pipe) A smooth dent with depth greater than 2% (0.25" in depth dent for less than 12" diameter pipe) that affects girth weld or long seam 	<ul style="list-style-type: none"> Pf/MAOP < 2.0 PG&E's Judgment 	<ul style="list-style-type: none"> All scheduled dents that engineering analyses demonstrate critical strain levels are not exceeded and left in place
Less than 30%	<ul style="list-style-type: none"> Pf/MAOP ≤ 1.1 Dents with metal loss, cracks or a stress riser PG&E's judgment SCC Metal loss affecting long seam formed by direct current, low frequency ERW or electric flash welding. Metal Loss > 80% W.T. 	<ul style="list-style-type: none"> A smooth dent with depth greater than 6% (0.5" in depth dent for less than 12" diameter pipe) A smooth dent with depth greater than 2% (0.25" in depth dent for less than 12" diameter pipe) that affects girth weld or long seam 	<ul style="list-style-type: none"> Pf/MAOP ≤ 3.3 PG&E's Judgment 	<ul style="list-style-type: none"> All scheduled dents that engineering analyses demonstrate critical strain levels are not exceeded and left in place

d/t – Defect depth to wall thickness ratio

5.5.2 Number of Excavations: The inspection plan shall specify the number and location of excavations. The required excavations are as follows

- **“Immediate”:** All Immediate anomalies (See Table 5.5.1) shall be excavated for direct examination.
- **“Scheduled-one year”:** All Scheduled-one year anomalies (See Table 5.5.1) shall be excavated for direct examination.
- **“Scheduled-other”:** All scheduled-other anomalies (See Table 5.5.1) shall be included in the inspection plan. If the Integrity Mgmt Program Manager approves a shorter re-inspection interval, then, a lower Pf/MAOP value can be used that allows them to be Monitored until next scheduled re-inspection, per Figure 5.5.2
- **“Monitored”:** No Monitored anomalies (See Table 5.5.1) are required to be excavated under these specifications. These anomalies must be recorded and compared to themselves during future inspections.
- **Minimum Excavations:** A minimum of two excavations shall be made for each ILI run. If two excavations are not sufficient to validate the ILI data, more excavations shall be performed.

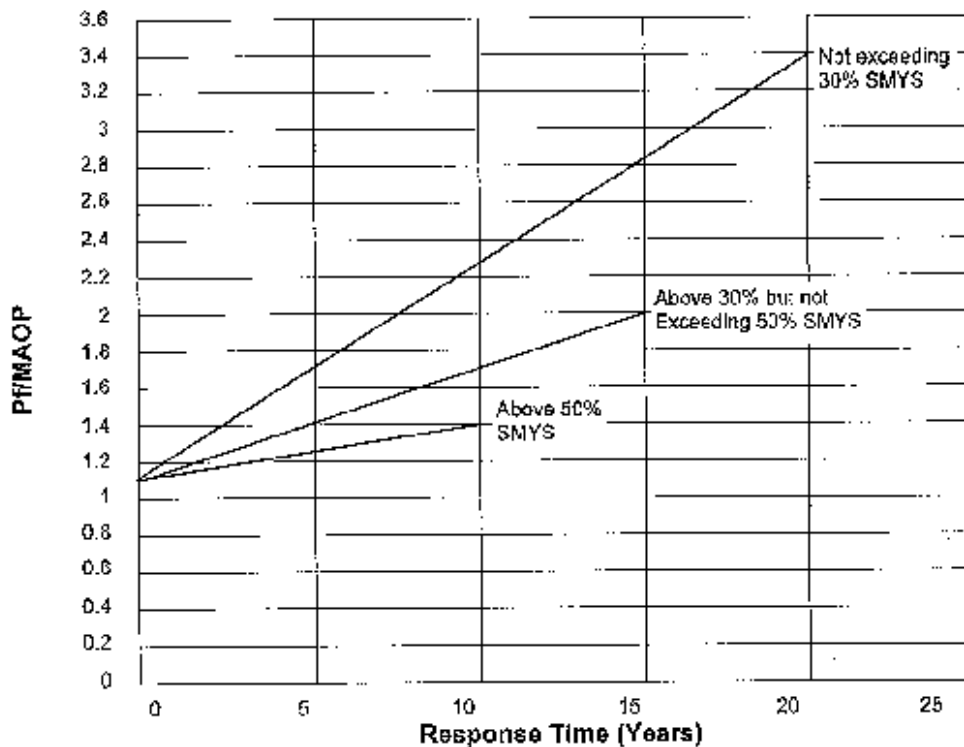


Figure 5.5.2
 (ASME B31.8S-2001, Section 7, Figure 4)
 TIMING FOR SCHEDULED RESPONSES—TIME DEPENDENT THREATS
 PRESCRIPTIVE INTEGRITY MANAGEMENT PLAN

5.5.3 Tool Tolerance Consideration: In selecting anomalies/clusters of corrosion for excavation, inspection and /or repair in order to gain maximum re-inspection interval, the ILI vendor tool tolerance should be added to the anomalies for calculating the P* per RMP File 7.11 (PG&E White Paper on P* Calculations Using ILI Data.)

5.5.4 Documentation: The Inspection Plan (Form G) shall be reviewed and approved by the ILI Program Manager and the Manager of Technical Services or his designate.

5.6 Field Examination : All Immediate anomalies on Form G shall be excavated, examined and repaired/pipe replaced not exceeding 365 days from the pressure reduction date (Form F) and the remaining Scheduled – one year and Scheduled - other anomalies on Form G shall be completed within 365 days of receipt of the final report from the ILI vendor (For the purpose of the procedure, the date shown on the ILI vendor's report will be used). Repair decisions made following excavation and examination are documented on Form L. If any of the required excavations or repairs can not be completed within 365 days, the PM shall complete an exception report (Form M) per Section 7 of this Procedure.

The field examination addresses any Immediate, Scheduled – one year, and selected Scheduled – other anomalies in the Inspection Plan. It also validates the In-Line Inspection Vendor's Report. The process includes:

- Scheduling the excavations

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- Excavating the anomalies and collecting data at the identified locations
 - Comparing the field data with ILI data
 - Evaluating remaining strength of the pipe segment
 - Performing repairs, if needed
- 5.6.1 Scheduling the Excavations:** The ILI Project Manager is responsible for scheduling the excavations to ensure that they are performed with consideration of the order determined in section 5.5 and consideration of the excavation efficiency.
- 5.6.2 Pipe Excavation and Data Collection:** The ILI Project Manager shall schedule and monitor the excavations, until all excavations needed to validate the re-inspection interval are completed. The pipe shall be excavated in accordance with PG&E Utility Operations Guideline G14413 "Procedure for Excavating Pipeline and Services." In addition, the following requirements shall be met:
- **Location and Size of Excavation:** The location and size of the excavation site shall be identified and recorded on Form H: EXCAVATION DATA SHEET. Each end of the excavation shall be located and recorded with a GPS instrument. The length of the excavation shall be physically measured and recorded on Form H.
 - **Data Collection:** Collecting data on the condition of the coating and the pipe at the excavation site is a key step of the ILI process. Either company personnel and/or the contractor can perform the data collection. The data that is to be collected for Form H is identified in Table 5.6.2. All excavation sites shall include wet magnetic particle inspection to test for SCC.

TABLE 5.6.2 DIRECT EXAMINATION DATA COLLECTION REQUIREMENTS (FORM H)

Data Element	DATA Type	Required	Description
1.0 Before Coating Removal			
1.1	Native Soil Type	R	Check the appropriate box to determine the type of soil the pipe is bedded in. The reference location shall be the middle of the cathode length at the springline location. Also, in the comments section record the type of soil the pipe is bedded in using the USC classification system. Clay, Loam, clayey sandy loam, etc.
1.2	Existing Coating Type	R	Record the existing coating type, its approximate thickness, and the number of layers. For reference use the middle of the excavation length at the springline of the pipe.
1.3	Holiday Testing	R	This test allows for electrical identification of location and size of coating holidays, and is particularly valuable in identifying areas to pay special attention to during coating removal. The holidays should be mapped electrically unless the coating is sufficiently degraded to where it is obvious where the holidays are. These areas could provide significant evidence and help in determining the root cause of any corrosion that is found. In addition, these areas could be critical in determining if the corrosion is active or inactive.
1.4	Measurement of pipe to soil potential	R	These measurements shall be performed in accordance with NACE Standard TM0437. The reference electrode shall be placed in the bank of the excavation within 1-2 inches of the coating. These potentials may help identify dynamic stray currents, as well as help in determining the root cause of any corrosion present (active vs. inactive).
1.5	Soil Resistivity	R	Soil resistivity measurements: (1) 4-pin method: The pin alignment shall be taken transverse to the pipe. The nearest probe shall be at least 10 feet from the pipe. Pin spacing shall approximate the pipe centerline depth. This is intended to be a measurement of native (original) soil conditions. (2) Soil Box: The soil desired here is that in which the pipe is bedded at the springline location in the middle of the excavation length. Note whether the soil is native or sand.
1.6	Soil Sample	R	The soil immediately adjacent to the pipe surface shall be collected with a clean spatula or trowel and placed in a 16 oz. plastic jar with a plastic lid. The soil desired here is that in which the pipe is bedded at the springline location in the middle of the excavation length. In some cases special samples must be obtained in situ using a "spoon" that will keep the sample confined. The data will be used for determining the soil corrosivity using a risk based weight-function model, and should be used for prioritizing excavations within the same priority. The sample jar should be packed full to displace as much air as possible. Tightly close the jar, seal with plastic tape or equivalent and using a permanent marker or label to record the sample location on both jar and lid. See Appendix C.
1.7	Groundwater Samples	R	Take groundwater samples if water is present in the excavation. Water should always be collected from the open ditch when possible. Completely fill the plastic jar and seal and identify location as described above. For special situations it will be used for determining the bulk groundwater chemical properties.
1.8	Coating Condition	R	Document the general coating condition. Three conditions could exist: (1) Coating is in good condition and completely adhered to pipe; (2) Coating partially delaminated and/or degraded; (3) The coating is significantly disbonded or missing, i.e., most of it comes off with the soil.
1.9	Map Of Coating Degradation	R	Note in the map the location of all coating holidays, calcareous deposits, etc. The zero reference shall be the farthest upstream location that is inspected.
1.10	Photo documentation	R	Document the coating condition with a digital camera. Photos shall have ruler or other device to determine magnification of photographs showing details of the pipe and coating condition. The minimum requirements shall be to document the following: <ul style="list-style-type: none"> • The type of cover • Macros showing the cross-section of the excavation (depth of pavement, soil strata, etc.); cross section showing the strata under the pipe especially if rocks are present. • Macros of areas where the loop test shows holidays • As-found condition of the coating after excavation is complete • General condition of coating • Showing the overall presence or absence of calcareous deposits after the coating has been completely removed but prior to sandblasting. • Presence or absence of rocks embedded in the coating (preferably at the 6:00 position) • Pitting before and after sandblasting • Any unusual characteristics of the pipe or excavation • After recoating • Documenting the as-left condition of the site Macro as well as perspective views shall be recorded. The photo log on page 9 of 10 of the H-form shall be filled out with any necessary descriptions of the photographed areas.

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Data Element	DATA Type	Required	Description
1.11	Coating Sample	R	Two samples of the coating shall be obtained. One will be sent to a lab for asbestos testing. The other sample will be stored for physical examination and aid in determining root cause. This sample may also be used to determine the electrical and physical properties of the coating as well as for performing microbial tests. This sample shall be obtained from an area where the worst pipe damage was found, if possible. This sample shall be given to the FFS or designee.
1.12	Under coating liquid pH analysis	R	If any liquid is detected underneath the coating its pH shall be determined with pH litmus paper. This test informs the relative level of CP reaching the pipe surface.
1.13	Corrosion Product Removal	R	Carefully remove any corrosion deposit for analysis. The presence or absence of corrosive species in the corrosion products can guide the root cause analysis. Analysis may include, but is not limited to, MIC testing, chemical testing, and in some cases XRD testing.
1.14	Soil pH	R	Obtain soil pH reading at the upstream and downstream ends of the bell hole using the Sb electrode. This must be done in the soil the pipe is bedded in. Helps determine the corrosivity of the soil.
2.0 After Coating Removal			
2.1	Pipe Temperature & Pipe Diameter	D	Measure the bare pipe surface temperature. This factors into the tendency for coating to disbond and SCC susceptibility. Measure the circumference of the pipe using a pl tape or other suitable device and compute the actual outside diameter of the pipe.
2.2	Weld Seam Identification	D	The type of weld seam shall be identified and recorded. It will be used to compare with GSAVE, and the presence of brittle seam welds could also be determined. If the seam type cannot be determined, check that box. In some cases it will be necessary to perform a macro etch to locate and characterize the weld type and condition. The macro will only be done when specifically called for by the FFS or designee. Recoating of the pipe and backfilling of the bell hole will not be allowed unless the long seam has been identified or there is no external corrosion.
2.3	Grill Weld Coordinates	R for ILI	This is required for ILI inspections. ILI keys on the nearest grill weld to determine the location of the bell hole and to compare to ILI grill weld data.
2.4	Other Damage	R	Other damage to the pipe surface that can be visually detected shall be recorded, and immediately reported to PG&E. Examples of such damage would include gouges, cracking, dents and out of roundness.
2.6	UT Wall Thickness Measurements	R	Ultrasonic wall thickness shall be taken at every quadrant on the pipe to establish original/nominal wall thickness. In cases where an ICDA pre-assessment has been performed, a UT grid shall also be obtained at the 6:00 location for a length of 1-foot circumferential by 4-foot axial. Grid size shall be 1"x1". The minimum thickness measured in each grid box shall be recorded. The grid shall be located at the low end of the pipe. This ICDA grid and angle of inclination shall be recorded on page 6 of 10 on the H-Form.
2.6	Wet Fluorescent Magnetic Particle Inspection	R	For determining the presence or absence of SCC this test shall be performed. Only the AC yoke method shall be used. Surface preparation shall be light sandblasting. On occasion the FFS or designee may require walnut shell blasting. Dry powder methods are not acceptable. Direct electric current methods are not acceptable. All indications shall be photo documented under both black and white light and the photos included in the report. The PG&E PM shall be notified immediately of any indications found.
2.7	Photographic Documentation of Corroded Areas	R	The corroded surface shall be photographed, preferably with a digital camera to document the morphology and extent of the corrosion. The photo log on page 9 of 10 of the H-Form shall be filled out with any necessary descriptions of the photographed areas.
2.8	Overview Map Of Corroded Area.	R	An overview map of the corroded area shall be sketched out onto the form. Enough detail shall be included to sufficiently document where and how large the corroded areas are. The zero reference point shall be the farthest upstream location that is inspected.
Page 3 of 10	Excavation Drawing	D	The pipeline inclination angle and the depth profile shall be measured and recorded at each end and in the middle of the bell hole. The inclination angle shall be recorded in the boxes above the grid, and the depth profile shall be measured and documented in the grid.
Pages 4 of 10 and 5 of 10 of the H-Form	Pit Depth Measurement Grid Sheets	R	Corrosion damage shall be measured with sufficient detail to enable accurate RSTRENG analyses of the corrosion area. A grid of wall loss measurements shall be taken over the entire corroded areas. The grid shall be oriented so that columns are circumferentially oriented on the pipe and the rows be parallel to the longitudinal axis of the pipe. The grid size should be sufficiently fine to document the variation of wall thickness but in no case shall be greater than a one-inch mesh. The grids shall be documented on pages 4 of 10 and 5 of 10 on the H-Form.
3.0 Pipe Recoat Data			
3.1	Sandblast Media	R	Record the type of media used - sand, grit, or copper slag are all acceptable. Use of shot is prohibited. Also record the final anchor profile measurement using the Testax Press-C-IPM tape method.

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Data Element	DATA Type	Required	Description
3.2	Re-coating Type	R	Record the coating type used to recoat the pipe.
3.3	Environmental Conditions	R	Document the relative humidity, temp, dew point, etc., at the time of coating. For epoxy systems, the pipe must be over 50 degrees F, at least 5 degrees F above the dew point and the relative humidity must be less than 80%.
3.4	Repair Coating Hardness	R	For epoxy systems measure and record the final hardness before the pipe has been released for burial.
3.5	Coating Thickness	R	Measure the coating thickness at the locations given. Each clock position listed shall be the average of 3 readings within a 4 cm circle. The repair coating shall be holiday tested and all holidays must be repaired and retested. It is preferable to repair holidays using the same coating system, although alternative repair systems can be acceptable. The FG&E FES or designator must approve all alternative repair systems.
3.6	Coupon Test Station Installation	R	Document the type of test station left behind. For coupons, it is recommended that the commissioning should begin no sooner than 3 months after installation. The test station should be installed at the extreme end of the bell hole adjacent to or in the "old" coating that is NOT being reconditioned.
3.7	Backfill Material	R	Note what material was used for backfill and whether or not pipe protection was used.
3.8	P/S Readings	R	Perform at least 1 P/S on reading over the pipeline after backfilling but BEFORE paving or any concrete work is done. In some cases perform a local "on" survey and record the results.
3.9	Site Sketch	R	A sketch of the site arrangement shall be made, showing the inspected area as well as measured distances from physical features such as roads, buildings, distance from upstream girth weld (if available), etc. The purpose would be to be able to determine the location using physical markers in the field (without using GPS) should the area be paved over, and to confirm the locations of those structures in GSAFE.

- 5.6.3 Evaluating Remaining Strength:** The RSTRENG or KAPA (Failure pressure calculation software developed by Kiefner & Associates) calculations are performed and the summary is recorded on Form I "DIRECT EXAMINATION SUMMARY" for the exposed corroded areas to evaluate the remaining strength of the pipe. The RSTRENG or KAPA calculations are used to determine the following:
- **Predicted Failure Pressure:** A P_f shall be calculated using RSTRENG or KAPA for each corroded area that is direct examined and determine if action needs to be taken. Other analytical techniques may be used if approved by the Manager of Technical Services or his designate. An individual trained and qualified to use RSTRENG or KAPA shall make these calculations. Records of the qualification shall be maintained in the Integrity Management Program file.
 - **Reassessment Interval:** The ratio of $P_f/MAOP$ of the field examined anomalies and $P_f/MAOP$ of the un-examined anomalies remaining on the pipeline (Table 5.6.5) are key factors in determining the reassessment Interval.
- 5.6.4 Comparing Field Data with ILIT Data:** A comparison shall be made between field data and ILI data; and to be provided as input for the Long Term Integrity Management Plan.
- 5.6.5 Performing Repairs on Excavated Anomalies:** In general, all corroded areas with P_f less than those shown in Table 5.6.5 shall be repaired so that the maximum re-inspection interval can be achieved. ILI Engineer to inform Pipeline Engineer and follow the Utility Work Procedure WP4100-05 to determine if and how the anomalies should be repaired. Any exceptions shall be documented on Form M "EXCEPTION REPORT" and approved by the Manager of Technical Services.

TABLE 5.6.5 MINIMUM P_f TO JUSTIFY MAXIMUM RE-INSPECTION INTERVAL³

CRITERIA		
AT OR ABOVE 50% SMYS	AT OR ABOVE 30% UP TO 50%	LESS THAN 30% SMYS
P_f above 1.39 times MAOP	P_f above 2.0 times MAOP	P_f above 3.3 times MAOP

- 5.7 MAOP Restoration Review/Concurrence :** If the pipeline pressure has been reduced, the ILI Program Manager shall evaluate the repairs and determine the timing of restoring the MAOP. He shall notify GT&D GE Director and the Manager of Technical Services, and gain concurrence from the Manager of Pipeline Engineering and the Manager of Technical Services to restore the MAOP, communicate and document all required operational/pressure changes to Gas System Operations (GSO).
- 5.7.1 Operational/Pressure Change:** GSO shall execute and order the required changes and the responsible district superintendent or T&R Supervisor shall ensure that the changes executed by GSO are implemented.

³ ASME B31.8S 2004, *Supplement to B31.8 on Managing System Integrity of Gas Pipelines*, Section 7, Figure 4

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5.8 Root Cause Analysis

Procedure: The ILI Project Manager shall ensure that a root cause analysis is performed on all Direct Examined pipe. Where it is determined that a significant number of direct examined anomalies are due to the same cause, a common single root cause report shall be sufficient. Where multiple causes are implicated, the number of root cause investigations shall be increased to adequately document the individual causes.

Documentation: The root cause of all Direct Examined pipe shall be documented on Form K "ROOT CAUSE ANALYSIS REPORT" and be completed within 90 days of receipt of the field examination report.

- 5.8.1 **Description of Damage:** Types of damage observed e.g. coating, pipe, and damage mechanism (external corrosion, third party, etc.).
- 5.8.2 **Extent of Damage:** Review GIS and other historical maintenance data to determine if they may assist in quantifying the extent of the damage or the needed extent of the mitigation activities.
- 5.8.3 **Review of Existing Damage Mitigation Measures:** Review of the existing mitigative measures that should address the threat causing the damage. Describe any problems with existing mitigation.
- 5.8.4 **Root Cause of Damage:** As a result of the review of the damage, historical data, and the existing mitigative measures, describe the root cause of the damage found.
- 5.8.5 **Review of Damage Mitigation Measures Taken:** Describe the actions taken to mitigate the damage found as a result of the ILI.
- 5.8.6 **Evaluation of additional Mitigation Efforts:** Describe any additional mitigation efforts that may help address the root cause of the damage. This may include coating replacement, the installation of additional CP, Landowner notifications, etc.
- 5.8.7 **Evaluation of need for additional testing:** If the root cause analysis identifies a mechanism that the ILI process is not well suited to detect, then it shall be documented on Form M and brought to the attention of the Manager of Technical Services.

5.9 **RMP-11 Final Report :** This report includes: ILI Vendor Report, Bellhole Inspection Report and PG&E Final Report.

- 5.9.1 **ILI Vendor Report:** This report includes the hard copy, associated software, and electronic data provided by the ILI vendor.
- 5.9.2 **Bellhole Inspection Report:** This report includes all "H-Forms" and is provided by the bellhole inspection vendor.
- 5.9.3 **PG&E Final Report:** Within 45 days after direct examinations and root cause analyses are complete, the ILI engineer shall be responsible for developing the PG&E final report. The report shall have the following content.
 - **Project Summary:** Project Manager shall complete a discussion of job details by project phase including lessons learned, results and critiques. (Attach Job estimate)
 - **Pre-Assessment:** Documentation of the ILI feasibility, Forms A, B and C, and the Pipeline Features List.

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- **ILI Planning:** Documentation of AGM locations, Form D. Documentation of the ILIT vendor qualification, Form E. (Attach ILI specification and ILI contract.)
- **ILIT Operation:** Project Manager shall summarize how the ILIT field operation went. (Attach Tracking Spreadsheet and Clearance Procedure)
- **Direct Examination:** Documentation of all direct examinations, Forms F, G, and I.
- **Post Field Inspection Pipeline Listing:** Pipeline anomalies list with all digs and repairs marked (Excel file).
- **Root Cause Analysis:** Documentation of root cause analysis, Form K
- **Exception:** Documentation of exceptions report, Form M.

5.10 GIS Anomaly Documentation : All anomalies listed in the ILI Vendor Report and the Bellhole Inspection Report shall be mapped in GIS including but not limited to the following information for data integration and future monitoring:

- **Geographic Location:** In UTM, Zone 10, NAD83, meters.
- **ILI Log Distance**
- **Severity Prioritization:** Whether it is Immediate, Scheduled-one year, Scheduled-other, or Monitored
- **Type of Anomaly:** Ext ML, Int ML, Dent, etc.
- **Relative Location of Anomaly:** Anomaly on pipe, weld or close to girth weld
- **O'clock position:** Location around the circumference
- **Size:** Maximum depth, length and width per ILIT
- **Box:** Cluster and Cluster ID
- **ILIT Pf:** Calculated (Pf) derived from Vendor's ILIT report
- **Direct Examination (Y or N)**
- **Actual Size:** Maximum depth, length and width per direct examination, if available.
- **RSTRENG Pf:** Calculated (Pf) derived from direct examination, if available
- **Pf/MAOP:** Use RSTRENG failure value for Pf, if available. Otherwise, use ILIT report Pf.
- **Record of Repairs:** Type of repair, date of repair, if available
- **Quality Assurance**
- **ILI date:** Date of the ILI run
- **Vendor Name:** ILI Vendor

5.11 Distribution: A hard copy of the RMP-11 Final Report shall be provided to the Integrity Management Program Manager for filing in the Integrity Management Library (Kettleman Conference Room 200). Additional copies of the ILI Vendor Report and Bellhole Inspection Report shall be distributed to the following persons:

- **ILI Program Manager**
- **ILI Project Manager**
- **ILI Engineer**
- **Pipeline Engineer responsible for the pipeline**
- **District Superintendent/Distribution T&R Supervisor responsible for the pipeline**

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6.0 POST ASSESSMENT

Objective: The objective of the Post Assessment process is to develop a Long Term Integrity Management Plan (LTIMP) to mitigate any significant deficiencies identified by the RMP-11 Final Report. The LTIMP shall include assigning re-inspection intervals and assessing/monitoring the overall effectiveness of the ILI process.

Responsibility: After completing the RMP-11 Final Report, the ILI Program Manager will turn over the project to the Integrity Management Program Manager who shall be responsible for determining and documenting the re-inspection interval, ensuring the re-inspection occurs prior to the end of the interval, and that a project is planned to mitigate any significant deficiencies identified by the RMP-11 Final Report. The Manager of Technical Services shall approve the LTIMP.

Documentation: The LTIMP including re-inspection interval for the pipeline segment shall be documented in the Integrity Management Areas (IMAs) per RMP-06.

6.1 Re-inspection Intervals: The Integrity Management Program Manager will review the anomalies in the ILI Vendor Report that are not direct examined and the root cause analysis to determine the appropriate re-inspection intervals per Figure 5.5.2 or Maximum re-inspection interval in Table 6.1, and recommend any additional long-term mitigation that needs to be done.

TABLE 6.1 TIMING SCHEDULE RESPONSES – TIME DEPENDENT THREAT⁴

INTERVAL (YEARS)	CRITERIA		
	AT OR ABOVE 50% SMYS	AT OR ABOVE 30% UP TO 50%	LESS THAN 30% SMYS
5	Pf (or Pf*) above 1.25 and <= 1.39 times MAOP	Pf (or Pf*) above 1.4 and <= 1.7 times MAOP	Pf (or Pf*) above 1.7 and <= 2.2 times MAOP
10	Pf (or Pf*) above 1.39 times MAOP	Pf (or Pf*) above 1.7 and <= 2.0 times MAOP	Pf (or Pf*) above 2.2 and <= 2.8 times MAOP
15	Not Allowed	Pf (or Pf*) above 2.0 times MAOP	Pf (or Pf*) above 2.8 and <= 3.3 times MAOP
20	Not Allowed	Not Allowed	Pf (or Pf*) above 3.3 times MAOP

6.2 Data Integration The following systems will be updated to ensure on-going data integration

GIS: All anomalies will be incorporated into the ILI anomaly theme. In addition, the Risk Mitigation theme will be updated to reflect the recent inspection of the pipeline segment. If the inspection reveals any data discrepancies in GIS, these will also be updated.

Integrity Management Plan: The integrity management plan for the pipeline segment will be updated to reflect the ILI inspection results.

Integrity Management Schedule: The integrity management schedule will be updated with the re-inspection date for the pipeline segment.

Long-term Mitigation: Mitigation activities will be scheduled to address any significant deficiencies identified by the LTIMP.

⁴ ASME B31.8S 2004, *Supplement to B31.8 on Managing System Integrity of Gas Pipelines*, pg. 21-6, Figure 4 (Section 5, Figure 5.5)

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7.0 EXCEPTION PROCESS

Objective: The objective of this section is to provide control and documentation of exceptions taken. This control and documentation is required to ensure the compliance with the ILI process, to continuously improve the process by providing feedback, and to have an auditable trail. It is expected that all requirements of this procedure be met in conducting an ILI. However, when it is not feasible to meet certain requirements then exceptions can be taken by obtaining approval; and documenting the exceptions as prescribed in this section.

Documentation: Document the above steps on Form M - EXCEPTION REPORT. Include all exception reports in the PG&E Final Report.

7.1 Exception Requirements: The following process is required for taking an exception with this procedure. It shall be documented on Form M - EXCEPTION REPORT:

- **Paragraph Number of Exception:** State the specific paragraph number where the exception is being taken.
- **Requirements of Paragraph:** Briefly state in your own words the requirements of the paragraph.
- **Alternative Plan:** To state what is proposed instead of what is required in the procedure.
- **Reason for Exception:** Provide the reason the exception is needed.
- **Recommendation:** Indicate if it is recommended to change the procedure or if this exception is project specific.
- **Approval:** Obtain approval from the Manager of Technical Services or his designate prior to acting on the exception.
- **Notification:** Refer to RMP-06, Section 15 for CPUC/OPS notification requirements.

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8.0 DOCUMENTATION AND RECORD KEEPING

Purpose: Table 8.0 summarizes the required forms and associated responsibilities.

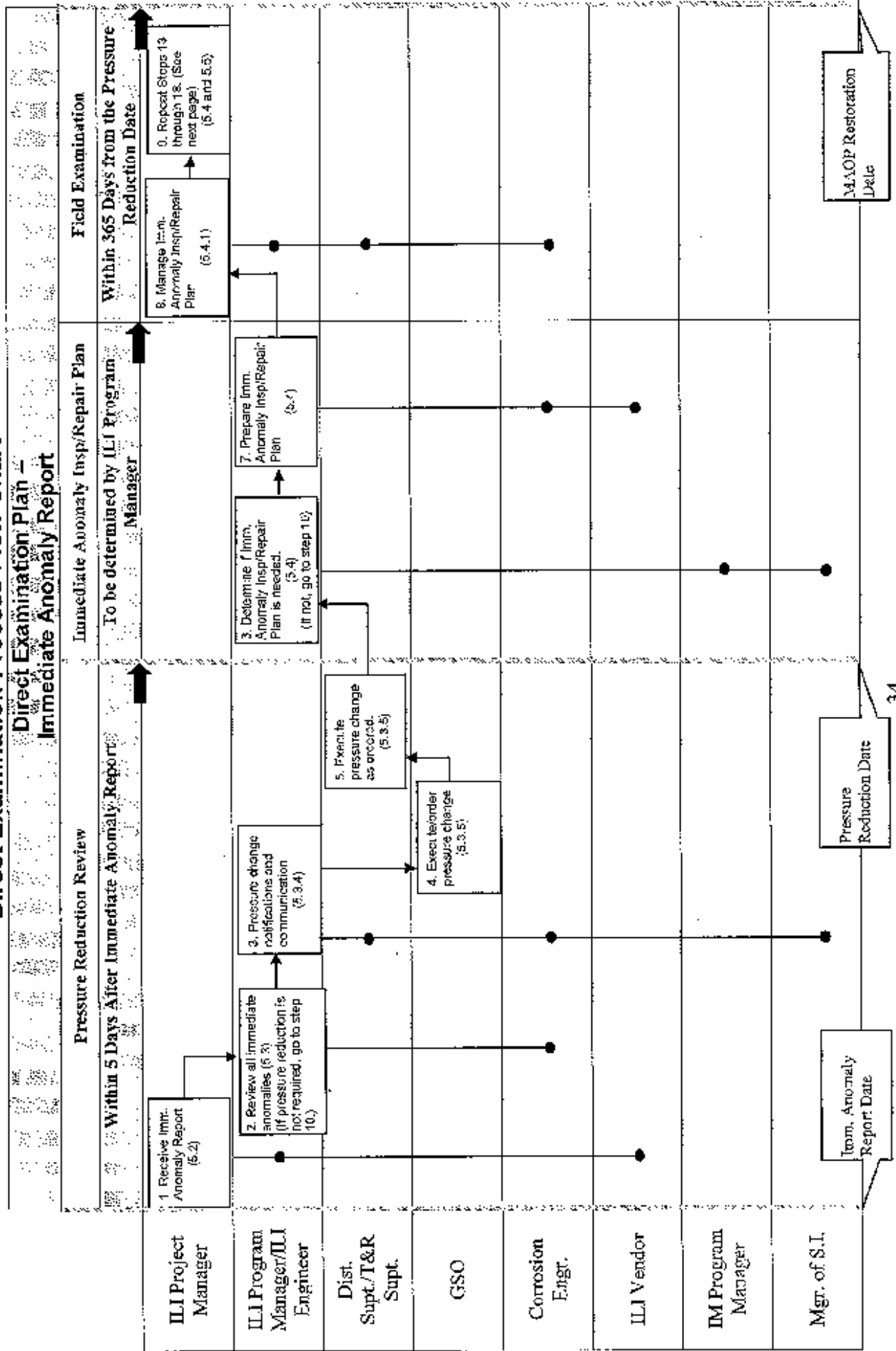
TABLE 8.0 - DOCUMENTATION AND RECORD KEEPING REQUIREMENTS

PARAGRAPH	FORM	PURPOSE	RESPONSIBILITIES
3.0 PRE-ASSESSMENT	A	Data Element Check List	ILI Engineer
	B	Sufficient Data Analysis	ILI Engineer
	C	Feasibility Analysis	ILI Program Manager ILI Engineer (This form includes the authorization of Forms A&B also.)
4.0 IN-LINE INSPECTION	D	AGM Locations	ILI Engineer
	E	ILI Vendor Qualification Form	ILI Engineer / ILI Program Manager
5.0 DIRECT EXAMINATION	F	Immediate Anomalies Analysis	ILI Engineer / ILI Program Manager
	G	Indication Prioritization and Direct Examination Form (Inspection/Repair Plan)	ILI Engineer ILI Program Manager Manager of Technical Services
	H	Document all immediate and scheduled anomalies	ILI Engineer or Corrosion Engineer
	I	Direct Examination Summary	ILI Program Manager
	J	Left Blank Intentionally	
	K	Root Cause Analysis	Sr Corrosion Engineer Manager of Technical Services
	A thru K and M	PG&E Final Report	ILI Program Manager
6.0 POST ASSESSMENT	L	Left Blank Intentionally	
OTHER	M	Exception Reports	ILI Engineer ILI Program Manager Manager of Technical Services

ATTACHMENT

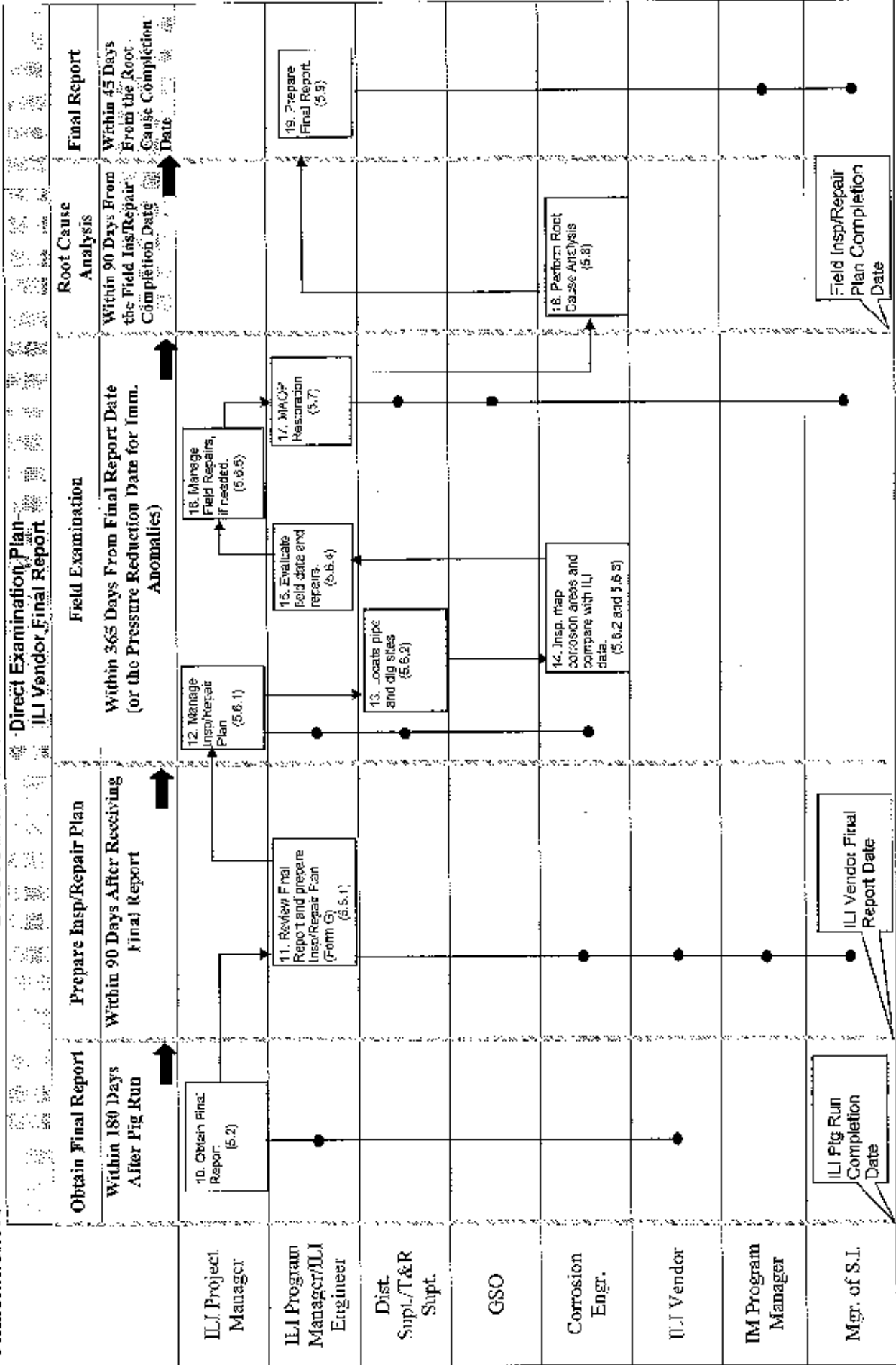
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Attachment A

Direct Examination Process Flow Chart



**RMP-11
Attachment A**

Direct Examination Process Flow Chart



**APPENDIX
ILI Forms**

FORM A: DATA ELEMENT CHECK SHEET

REFERENCE SECTION: TABLE 3.3.1

LINE NUMBER: _____

STARTING MILE POINT: _____

ENDING MILE POINT: _____

PROJECT MANAGER: _____

Table 3.3.1: Pre-assessment Data List

ID #	Data Element Description	Description	Requirements			Data Source			Comments
			Inspection Tool	Analysis of Inspection Results	CIS	As-built/Jobfile	Field	Division	
1.0 Pipe Related									
1.1	Diameter	May reduce detection capability or prohibit passage of tool.	R	R	X	X			Pipeline Features List
1.2	Wall Thickness	May reduce detection capability or prohibit passage of tool.	R	R	X	X			Pipeline Features List
1.3	Grade		R	N/R	X	X			Pipeline Features List
1.4	Seam Type		D	C	X	X			Pipeline Features List
1.5	Year Manufactured	May influence tool selection	D	C	X	X			Pipeline Features List
2.0 Construction Related									
2.1	Year Installed		D	C	X	X			Pipeline Features List
2.2	Recent route changes/modifications that may not be in GIS		D	C		X	X		
2.3	Construction Practices		D	C		X	X		Engr. Stds. drawings
2.4	Location of major pipe appurtenances such as valves and laps	Investigate potential need for replacement or the installation of bars for boxes	R	C	X	X	X		

1 R = Required, D = Desired (See paragraph 2.5 for definitions)

2 R = Required, C = Considered, N/R = Not required

ID #	Data Element Description	Description	Requirements		Data Source				Comments	
			Need	Inspection Tool	Inspection Results	CIS	As-built Job File	Field		Districts or Division
2.5	Location of bends, including under bends and variable bends	In-Line Inspection Tool Selection May indicate locations at which replacements are needed to make the pipeline plugable	R	R	C	X	X		Trans. P/ct Sheet	
2.6	Location of casings		D	N/R	C	X	X			
2.7	Proximity to other pipeline structures, HV electric transmission lines and rail crossings	Interpretation and Analysis Of Inspection Results	D	C	C	X	X			
2.8	Underwater sections and river crossings	Access issue for post p-egging dig and potential coating defect	C	N/R	C	X	X			
2.9	Location of bores	Access issue for post p-egging dig and potential coating defect	D	N/R	C	X	X			
3.0 Soils/Environmental										
3.1	Soil characteristics & types	Can be useful in interpreting results. Influences corrosion rate	D	C	C	X	X		Form 4110	
3.2	Assessment of environmental conditions	May indicate potential environmentally sensitive areas	D	N/R	C	X	X			
3.3	Topography	Conditions such as rocky areas can make field inspections difficult or impossible.	D	C	N/R		X			
3.4	Land use (current/past)	Can be considered in evaluating the potential severity of damage.	D	C	C	X	X			
3.5	Locations of poor drainage	Influences corrosion rate and remaining life calculation	D	N/R	C		X	X		
4.0 External Corrosion										
4.1	CP System Type (anodes, rectifiers, and locations)	Support root: cause analysis and CIS survey	D	N/R	C		X	X	CPA Records	
4.2	CP system boundaries	Support root: cause analysis and CIS survey	D	N/R	C		X	X	CPA Records	
4.3	Locations of Isolation Points	Support 100: cause analysis and CIS survey	D	N/R	C		X	X	CPA Records	
4.4	Locations of Connections to Distribution	Support 100: cause analysis and CIS survey	D	N/R	C		X	X	CPA Records	
4.5	Stray Current source/locations	Support root cause analysis and CIS survey	D	N/R	C		X	X	CPA Records, past survey reports.	

ID #	Description		Requirements	Data Sources					Comments		
	Data Element Description	In-Line Inspection Tool Selection		Need	Inspection Tool	Interpretation and Analysis of Inspection Results	GIS	As-built Job file		Field	District or Division
4.6	Test point locations (pipe access points)		May provide geographic reference for ILI run	D	N/R	C	X	X	X	CPA Records	
4.7	CP evaluation criteria		Used in post-assessment analysis	D	N/R	C				CPA Records, Paradigm	
4.8	CP maintenance history		Support root cause analysis and CIS survey	D	N/R	C			X	CPA Records, Paradigm	
4.9	Years without CP applied		Negatively affects ability to estimate corrosion rates	D	N/R	C		X	X		
4.10	Coating type - pipe		Coating type may influence time at which corrosion begins and estimates of corrosion rate based on measured wall loss.	D	N/R	C	X	X			
4.11	Coating condition		May help with root cause analysis of anomalies	D	N/R	C	X		X	Direct Assessment	
4.12	Current demand		Support root cause analysis and CIS survey	D	N/R	C			X	CPA Records	
4.13	CP survey data/history		Support root cause analysis and CIS survey	D	N/R	C				CPA Records, Paradigm, Corrosion Group	
5.0 Operational Data											
5.1	Operating stress level, pressure, flow rate	For controlling the piggings velocity	Impacts critical anomaly size	R	R	R	X			GSD, TSP	
5.2	Monitoring programs (pilot leak surveys etc.)		May impact repair, remediation and replacement schedules.	D	N/R	C				Corrosion Group, Form 4110	
5.3	Pipe inspection reports- excavation		Provide useful data for post-assessment analysis or data verification	D	N/R	C	X		X	Form 4110	
5.4	Repair history/records- steel/composite repair sites/repairs, repair locations		Provide useful data for post-assessment analysis or data verification	D	N/R	C	X		X	Form 4110	
5.5	Leak reports history		Provide useful data for post-assessment analysis	D	N/R	C	X		X	Form 4110	
5.6	Type and frequency of third party damage (review construction activities with operating personnel)		High third party damage areas may have increased coating fault anomalies.	R	N/R	R	X		X	Form 4110 USA Data Base Patrol Records	
5.7	Other prior integrity related activities - CIS, ILI runs, etc.		Useful post-assessment data	R	N/R	R	X			Corrosion Group, System	

ID #	Data Element Description	Description	Requirements		Data Source					Comments	
			Need	Inspection Tools	Inspection Results	CIS	As-built Job file	Field	District or Division		Other
5.8	Hydro test Cases/pressures		D	N/R	C	X	X			Integrity	
5.9	Known areas of shallow cover	Affects manufacture thermal review	D	N/R	C			X			
5.10	Location of abnormal pipe operating temperatures	Potential 5" party damage Possible locations for SCL, Influence of activating manufacture defects	D	N/R	C			X			SCADA
6.0 Internal Corrosion (IG)											
6.1	History of IC leaks	Influence post-pigging dig plan	D	C	C	X	X				
6.2	Received gas from gathering or storage lines	To establish linear (a potential IC, influence post-pigging dig plan	D	N/R	D	X			X		
6.3	Drip location	Influence post-pigging dig plan	D	N/R	C	X		X			
6.4	Drip fluid analysis	Influence post-pigging dig plan	D	D	D	X		X			
6.5	Inhibitor injection	Influence post-pigging dig plan	D	D	D	X		X			
6.6	Previously "pigged"	Influence post-pigging dig plan	D	N/R	C				X		
6.7	Corrosion monitoring (UPR probes, weight loss coupons, corrosion meter probes, etc.)	Influence Root Cause analysis, post-pigging dig plan, and the LTIMP prevention and mitigation plan.	D	N/R	C				X		Maintenance Records
7.0 Hard Spot											
7.1	Year installed, mill, scan type, etc. per RAC-06 Section 3.5	Influence Root Cause analysis, post-pigging dig plan, and the LTIMP prevention and mitigation plan	D	C	C	X	X	X			
7.2	Records of hard spot failures	Influence Root Cause analysis, post-pigging dig plan, and the LTIMP prevention and mitigation plan	D	C	C	X					Form 4110
7.3	Abnormal CP levels	Influence Root Cause analysis, post-pigging dig plan, and the LTIMP prevention and mitigation plan	D	C	C	X			X		

II.I Engineer: _____

Date: _____

Form B: Sufficient Data Analysis Form

LINE NUMBER: _____
 STARTING MILE POINT: _____
 ENDING MILE POINT: _____

REFERENCE: SECTION 3.7

PROJECT MANAGER: _____

SUFFICIENT DATA ANALYSIS

Missing Required Data Elements		Pipe Segments		Reason for missing data	Explanation why it is not needed (if any)
ID#	Data Element Description	ID#	Description		

Sufficient Data: Yes _____ No _____ ILI Engineer: _____ Date: _____

Form C: Feasibility Analysis Form

LINE NUMBER: _____ REFERENCE SECTION: SECTIONS 3.8
 STARTING MILE POINT: _____ PROJECT MANAGER: _____
 ENDING MILE POINT: _____

Instructions: Analyze each data and note any of the issues listed below. In answering the question include the following:
 1) Any adverse conditions that may make the pipe segments infeasible to ILI. Refer to Table 3.3.1 for guidance.
 2) Any special considerations, techniques that need to be incorporated or considered in conducting the ILI to overcome the adverse conditions
 3) A conclusion on the feasibility of conducting an ILI for all the pipe segments in the ILI project

ILI FEASIBILITY ANALYSIS			
ID #	Data Categories	In-Line Inspection	Direct Examination
1.0	Pipe Related	Can existing In-Line Inspection tools be applied to the pipe segments identified in the ILI project and be expected to provide meaningful results on potential locations where the pipe wall is damaged?	Is it physically and economically feasible to gain access to the pipeline to conduct direct examination and be expected to gain meaningful data?
2.0	Construction Related		
3.0	Soils/Environmental		
4.0	Corrosion Control		
5.0	Operational Data		

ILI Feasible: Yes _____ No _____
 ILI Engineer: _____ Date: _____
 ILI Program Manager: _____ Date: _____

NOTE: Signing this form confirms authorization of forms A-C.



Form D: Above Ground Marker Locations

Reference Section: Section 4.2

Line Number: _____

Starting Mile Point: _____

Ending Mile Point: _____

Project Manager: _____

Above Ground Marker #	Mile Point (From GIS)	Above Ground Distance Between Ags (feet)	Eastng. (UTM NAD83) (meters)	Northng. (UTM NAD83) (meters)	Ground Elevation (UTM NAD83) (feet)	Depth of Cover (feet)	Type of AGM	Type of Marker	Comments

ILI Engineer: _____

Date: _____

- (1) To top of pipe
- (2) Examples include - Point on line, major pipe appurtenances
- (3) Examples include - Concrete, iron pipe, rebar, nail and shine, etc.

Form E: ILI Vendor Qualification Form

REFERENCE: SECTION 4.3

ILI Material Job # _____

VENDOR NAME: _____

INSTRUCTIONS: Paragraph 4.3.1.2 in the ILI Procedure provides instructions on completing and filing of this form.

Specification Content Review

Not

Acceptable

Acceptable	Not Acceptable	Comments
<input type="checkbox"/>	<input type="checkbox"/>	Safety
<input type="checkbox"/>	<input type="checkbox"/>	Sizing Accuracy
<input type="checkbox"/>	<input type="checkbox"/>	Caliper Accuracy
<input type="checkbox"/>	<input type="checkbox"/>	Geospatial Accuracy
<input type="checkbox"/>	<input type="checkbox"/>	Operator Qualifications
<input type="checkbox"/>	<input type="checkbox"/>	Schedule
<input type="checkbox"/>	<input type="checkbox"/>	Report Format

General Comments/Exceptions:

Approved

Comment: _____

ILI Engineer: _____ Date: _____

ILI Program Manager: _____ Date: _____

(U) MFL, TFI, EMAT, etc. _____

Form E: Immediate Anomalies Analysis

(To be completed when Immediate Anomalies are received.)

Reference Section: Sections 5.3, 5.4

Line Number: _____

Starting Mile Point: _____

Ending Mile Point: _____

ILI Run Date: _____

PG&E Notification Date: _____

Project Manager: _____

ILI Data														Assessment											
MP	IL Log	Distance	Type of Indication(2)	% Thru Wall	% Dent	Length	O'clock	Position	PR/MAOP (ILI Report)	O.D.	W.T.	Grade	Class	Location	HCA? (Y/N)	Pf	MAOP	Ps	PR/MAOP	Priority(3)	Pdis(4)	80% of Pdis	Comments		

Per the evaluation above, the safe operating pressure is: _____
 GSO Notification Date: _____
 Pressure Reduction Date: _____
 Safety Related Condition? (Y/N): _____

If Yes, Notification Date: _____

ILI Engineer: _____ Date: _____
 ILI Program Manager: _____ Date: _____

(1) The date the ILI vendor notifies PG&E of an immediate anomaly.
 (2) Metal loss-external, metal loss-internal, dents, etc.
 (3) See Table 5.5.1.
 (4) Pdis equals the highest pressure during the ILIT run or the maximum pressure between the ILIT run and the time the immediate anomalies are identified.

Form H: Direct Examination Data Sheet - Page 1 of 10

<u>DA/ILI</u>	<u>DA</u>	<u>ILI</u>
Route Number: _____	N-Segment: _____	ILI Log Distance: _____
Examination Date: _____	IMA Number: _____	RMP-11 Ref. Section: Table 5.6.2
Mile Point: _____	Region Number: _____	Reference Grid Weid: _____
Examination Performed By: _____	St. Region # (IGDA): _____	Distance From Grid Weid: _____
MG&E Project Manager: _____	Stationing: _____	
Approved By: _____		
Order Number: _____		

Excavation Priority:

Immediate Scheduled (For ILI / Year Other) Monitor Effectiveness ICDA

Excavation Reason

ECDA H.I Reconst
 ICDA Other _____

If practical, take P/S or GIS reads before excavation:

Excavation Details: Contourline on GPS Coordinates (Based on GIS): _____

Nothing: _____ Planned Excavation Length (Ft.): _____
 Easting: _____ Actual Excavation Length (Ft.): _____

Contourline on GPS Coordinates (Uncorrected Field Measurement): _____ GPS File Name: _____

Nothing: _____
 Easting: _____

Contourline on GPS Coordinates (Corrected Field Measurement): _____

Nothing: _____
 Easting: _____

1.0 Data Before Coating Removal

1.1 Native Soil Type: Clay Rock Sand Loam Wet Other _____

1.1a Backfill Material Found: Sand Slurry Native Depth of Cover (Ft.): _____

Comments: _____

1.2 Coating Type: HAA Somatic Plastic Tape Wax Tape FBE Powercrete
 Bare/None Paint Other: _____ Comments: _____

Coating Thickness (Inches): _____ Number of Layers: _____

1.3 Holiday Testing Performed?: Yes No Voltage Used: _____ Map Location of Holidays Below.
 Device Used: Coil Wet Sponge Comments: _____

1.4 Pipe-to-Soil Potentials in Ditch (-mV): JS: _____ DS: _____
 Comments: _____

1.5 Soil Resistivity in Ditch (Ω -cm):
 Method: 4-Pin _____ Soil Box _____

1.6 Soil Sample Location: Comments: _____

1.7 Ground Water Present?: Yes No Sample(s) Collected?: Yes No Sample pH: _____
 Comments: _____

1.8 Coating Condition: Good - Adhered to Pipe Fair - Coating Partially Disbonded or Degraded
 Poor - Coating Significantly Disbonded or Missing

Comments: _____

1.9 Map of Coating Degradation*: Zero Reference Point: _____

*Note any calcareous deposit locations

Flow \longrightarrow

12 o'clock									
9 o'clock									
6 o'clock									
3 o'clock									
12 o'clock									

Form H: Direct Examination Data Sheet - Page 2 of 10

DA/ILI	DA	ILI
Route Number: _____	N-Segment: _____	ILI Log Distance: _____
Examination Date: _____	IMA Number: _____	RMP-11 Ref. Section: <u>Table 5.6.2</u>
Mile Point: _____	Region Number: _____	Reference Girth Weld: _____
Examination Performed By: _____	Subregion # (CDA): _____	Distance From Girth Weld: _____
PG&E Project Manager: _____	Stationing: _____	
Approved By: _____		
Order Number: _____		

1.10 Photos Taken?: Yes No
 *See Photo Log for additional information.

1.11 Coating Sample Taken?: Yes No

Location of Sample: _____

1.12 Liquid Underneath Coating?: Yes No

If Yes, pH of Liquid: _____

1.13 Corrosion Product Present?: Yes No

If Yes, Was Sample Taken?: Yes No

Comments: _____

1.14 Soil pH (Sb Electrode): Upstream: _____ Downstream: _____

2.0 Data After Coating Removal

2.1 Pipe Temperature (°F): _____ Measured Pipe Diameter (in.): _____

2.2 Weld Seam Type: DSAW SSAW ERW EMILS
 Spiral Lap Flash AO Smith I can't determine, visually perform macroetch to locate & identify type (see Table 6.7.0, Element 2.2)

2.3 Girth Weld Coordinates:
 Northing: _____
 Easting: _____
 Elevation: _____
 Weld Clock Position: _____

2.4 Damage Found:
 Corrosion Damage Yes No Mechanical Damage Yes No
 Other Damage: _____

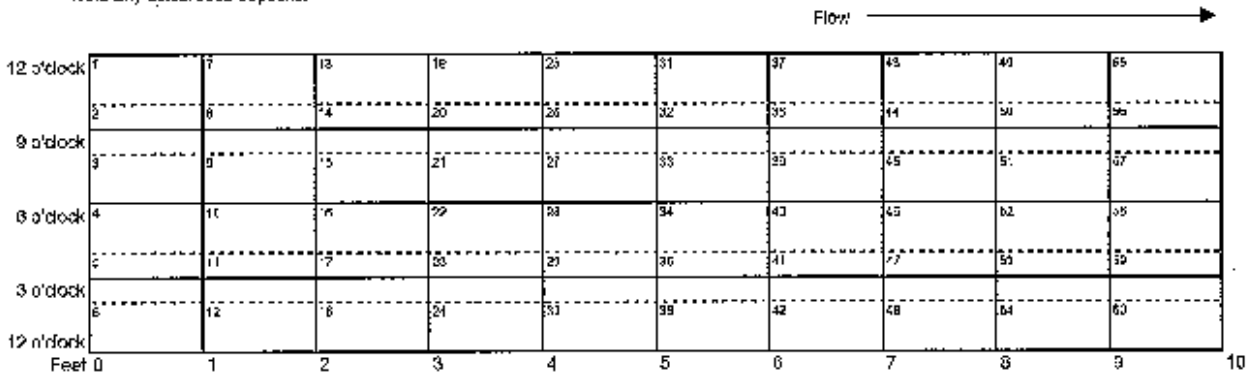
2.5 UT Wall Thickness Measurements: TDC: _____ 1 O'clock: _____ 2 O'clock: _____ 3 O'clock: _____
 4 O'clock: _____ 5 O'clock: _____ 6 O'clock: _____ 7 O'clock: _____
 8 O'clock: _____ 9 O'clock: _____ 10 O'clock: _____ 11 O'clock: _____

UT Wall Thickness Grid @ 6:00 is required. Be sure to attach grid to H-Form electronically. See page 6 of 10.

2.6 Wet Fluorescent Mag. Part. Is Required. Comments: _____
 Were there any linear indications? Yes No If Yes, attach NDE report electronically as part of the H-Form. Report to include black light and white light photos of indications.

2.7 Take Photos to Document Corrosion and Other Anomalies*
 *See Photo Log for additional information.

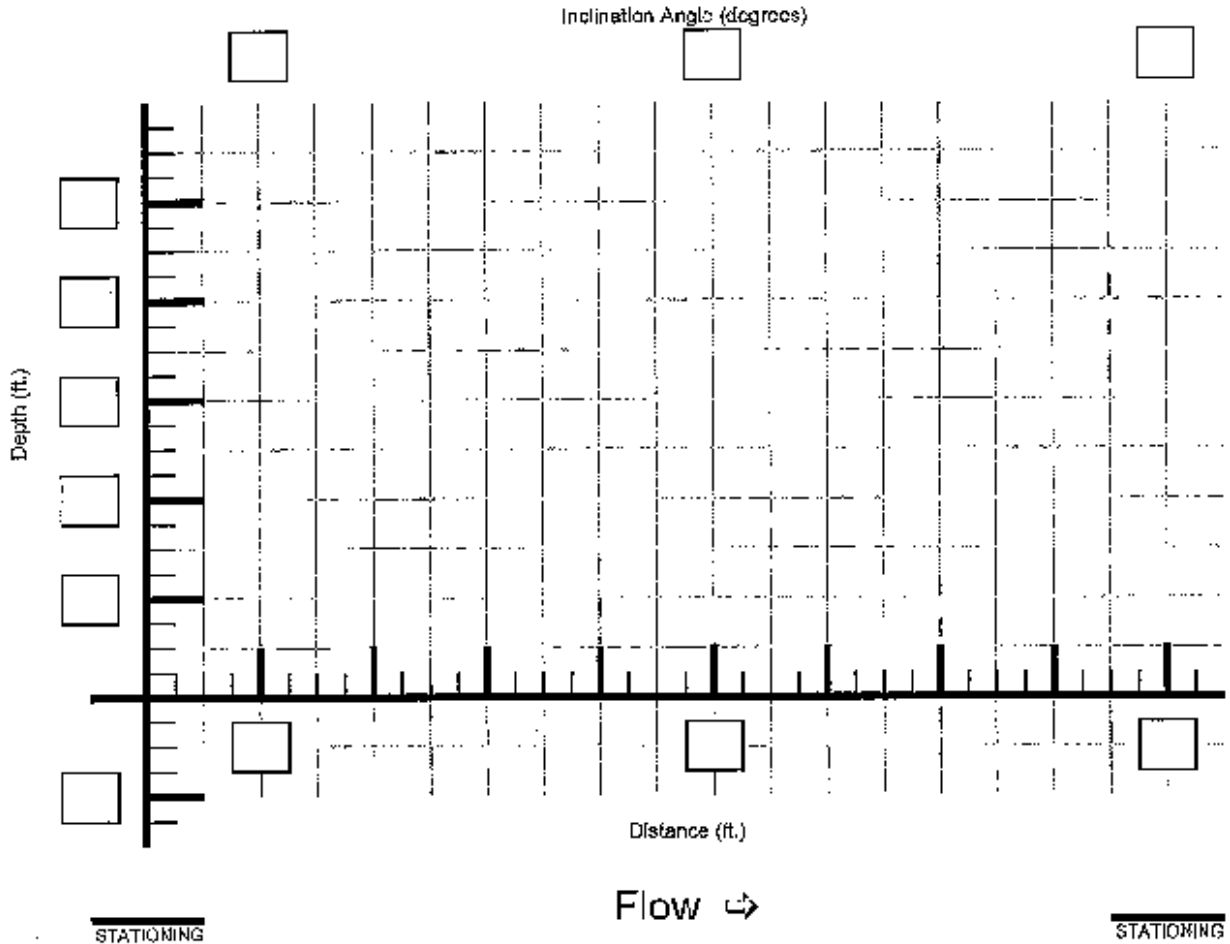
2.8 Overview Map of Corroded Area*: _____ Zero Reference Point: _____
 *See Pit Depth Measurement Grid for additional information.
 *Note any calcareous deposits.



<p>DA/LL</p> <p>Route Number: _____</p> <p>Examination Date: _____</p> <p>Mile Point: _____</p> <p>Examination Performed By: _____</p> <p>PG&E Project Manager: _____</p> <p>Approved By: _____</p> <p>Order Number: _____</p>	<p>DA</p> <p>N-Segment: _____</p> <p>IMA Number: _____</p> <p>Region Number: _____</p> <p>Subregion # (ICDA): _____</p> <p>Stationing: _____</p>	<p>LI</p> <p>ILI Log Distance: _____</p> <p>RMP-11 Ref. Section: Table 5.6.2</p> <p>Reference Girth Weld: _____</p> <p>Distance From Girth Weld: _____</p>
---	---	---

Excavation Drawing:

At minimum: draw pipe elevation profile and indicate stationing of 1) low point and 2) critical inclination angle. Place an arrow on the drawing indicating direction of gas flow in the region(s). Other labels may also be added (e.g. "Lo Station").



NOTES: (Record stationing and names of nearby landmarks such as creeks and roads. Provide any additional information that may help in precisely positioning pipe):

EXTERNAL PIT DEPTH MEASUREMENT GRID SHEETS

<p><u>DA/ILI</u></p> <p>Route Number: _____</p> <p>Examination Date: _____</p> <p>Mile Point: _____</p> <p>Examination Performed By: _____</p> <p>PG&E Project Manager: _____</p> <p>Approved By: _____</p> <p>Order Number: _____</p>	<p><u>DA</u></p> <p>N-Segment: _____</p> <p>IMA Number: _____</p> <p>Region Number: _____</p> <p>Subregion # (ICDA): _____</p> <p>Stationing: _____</p>	<p><u>ILI</u></p> <p>ILI Log Distance: _____</p> <p>RMP-11 Ref. Section: <u>Table 5.3.2</u></p> <p>Reference Grid Well: _____</p> <p>Distance from Grid Well: _____</p>
--	---	---

Grid Size = _____ Inch x _____ Inch. (specify grid size)
 Clock Position (specify below)

Anomaly #: _____ Grid #: _____

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
A																							
B																							
C																							
D																							
E																							
F																							
G																							
H																							
I																							
J																							
K																							
L																							
M																							
N																							
O																							
P																							
Q																							
R																							
S																							
T																							
U																							
V																							
W																							
X																							

PIT DEPTH GRID 1 OF 2

EXTERNAL PIT DEPTH MEASUREMENT GRID SHEETS

DA/ILI
 Route Number: _____
 Examination Date: _____
 Mile Point: _____
 Examination Performed By: _____
 PG&E Project Manager: _____
 Approved By: _____
 Order Number: _____

DA
 N-Segment: _____
 SMA Number: _____
 Region Number: _____
 Subregion # (GGDA): _____
 Stationing: _____

ILI
 ILI Log Distance: _____
 RMP-11 Ref. Section: Table E.G.2
 Reference Girth Weld: _____
 Distance From Girth Weld: _____

Grid Size - _____ Inch x _____ Inch. (specify grid size)
 Clock Position (specify below)

Anomaly #: _____ Grid #: _____

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
A																							
B																							
C																							
D																							
E																							
F																							
G																							
H																							
I																							
J																							
K																							
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M																							
N																							
O																							
P																							
Q																							
R																							
S																							
T																							
U																							
V																							
W																							
X																							

PIT DEPTH GRID 2 OF 2

INTERNAL CORROSION PIT DEPTH GRID

DA/ILI
 Route Number: _____
 Examination Date: _____
 Mile Point: _____
 Examination Performed By: _____
 PG&E Project Manager: _____
 Approved By: _____
 Order Number: _____

DA
 N-Segment: _____
 IMA Number: _____
 Region Number: _____
 Subregion # (ICDA): _____
 Stationing: _____

ILI
 ILI Log Distance: _____
 RMP-11 Ref. Section: Table 6.6.2
 Reference Grid Width: _____
 Distance From Grid Width: _____

Grid Size = 1 Inch x 1 Inch
 Clock Position (specify below)

	1	2	3	4	5	6	7	8	9	10	11	12
A												
B												
C												
D												
E												
F												
G												
H												
I												
J												
K												
L												

INTERNAL CORROSION GRID
 1 of 1

<p style="text-align: center;"><u>DA/IL</u></p> <p>Route Number: _____ Examination Date: _____ Mile Point: _____ Examination Performed By: _____ PG&E Project Manager: _____ Approved By: _____ Order Number: _____</p>	<p style="text-align: center;"><u>DA</u></p> <p>N-Segment: _____ JMA Number: _____ Region Number: _____ Subregion # (ICDA): _____ Stationing: _____</p>	<p style="text-align: center;"><u>IL</u></p> <p>IL Log Distance: _____ RMP-11 Ref. Section: Table 5.6.2 Reference Girth Weld: _____ Distance From Girth Weld: _____</p>
---	---	--

3.0 Recoat Data

3.1 Sandblast Media: _____ Anchor Profile Measurement: _____

3.2 Pipe Recoated With:

Powercrete J Wax Tape Bar-Rust 235 Dev Grip 236 Dev Tar 247 Protel 7200 PE Tape

3.3 For Epoxy Coating Systems, Record Environmental Conditions:

Air Temperature: _____ Dew Point: _____
 Pipe Temperature: _____ Relative Humidity: _____
 Time of Day: _____

3.4 Repair Coating Hardness (If ARC Coatings): _____

3.5 Measured Coating Thickness: 8:00 - _____ 8:00 - _____ 9:00 - _____ 12:00 - _____

Holiday Tested?: Yes No

Device Used: Coil Wet Sponge Voltage Used: _____ Repair All Holidays: _____

3.6 Coupon Test Station Installed?: Yes No ETS Installed?: Yes No

If Yes, Date Installed: _____

Surface Configuration: Flank 3-6 Box Carborite Other: _____

3.7 Backfill Material: Native Imported Sand Other: _____

Coating Protection?: Yes No

If Yes, Check One: Rockguard Tuf-E-Xuf Conwed Other: _____

3.8 Pipe-to-Soil Readings Over Bell Hole After Backfill: _____

*If specified, a CIS should be done for approximately 100' on either side of the bell hole. Attach data.

Comments: _____

3.9 Attach site sketch of excavation site.

4.0 Repair Data

4.1 Repair Made: Yes No 4.1 Number of repairs made: _____

4.3 Repair Type: Metallic Sleeve Non Metallic Sleeve Replace Can Fiber Metal Other

4.4 Damage Repaired: Corrosion Mechanical Other

Misc. Comments/Information: _____



Form I: Field Examination RSTRENG Summary

Reference Section: Section 5.8

Line Number: _____
Starting Mile Point: _____
Ending Mile Point: _____

ILI Vendor Final Report Date: _____
Project Manager: _____

ILI Report (From Form G)														Effective Area Calculation Based on Field Data			Repair Information							
MP	ILI Log Distance	Type of Indication(1)	% Thru Wall	% Dent	Length	O'clock Position	Priority	% Thru Wall	% Dent	Length	O'clock Position	MAOP	Pipeline % SMYS at MAOP	P(2)	P/MAOP	New Priority	Engineer	Date	Repair Required (Y/N)	Repair Date	Comments - Type of Repair			

ILI Engineer: _____ Date: _____
ILI Program Manager: _____ Date: _____

(1) Metal loss-external, metal loss-internal, dents, etc.
(2) P₂ = highest burst pressure calculated from RSTRENG

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Form J: (Left Blank Intentionally)



GTR0003816

Form K (1 of 2): ILI Root Cause Analysis Report

LINE NUMBER: _____
DATE OF EXCAVATION: _____
MILE POINT: _____
EXAMINATION PERFORMED BY: _____
PROJECT MANAGER: _____
APPROVED BY: _____

ILI LOG DISTANCE: _____
RMP-11 REF. SECTION: 5.8
DIG SITES: _____

Description and Extent of Damage:

Coating Damage Pitting Gen. Wall Loss Dent Gouge Other _____

Rocks in Coating: Yes No **Evidence of Shielding:** Yes No

Coating Type: FAA Sonastic Plastic Tape Wax Tape FBE Other-Epoxy Bare/None
 Paint Other _____ **Comments:** _____

Extent of Coating Degradation: _____

Max. Depth of Corr.: _____ **Max Length of Corr.:** _____

Comments: _____

Matrix of Testing Performed:

Soil Resistivity: Yes No **Result:** _____

Lab Soils Protocol: Yes No **Results:** _____

MIC Testing Performed: Yes No **Results [Log (counts/ml)]:** SRB _____ APB _____ AERO _____ ANA _____

pH of Water Under Coating: _____ **CIS Over Bell Hole:** Yes No

CIS Result: _____ **P/S Spot Reads in Trench:** Yes No **Result:** _____

Additional Testing: _____

Comments: _____

Review of CP Maintenance History:

Summary Review of Compliance Reads: _____

IT Results Before Excavation: _____

CIS or P/S Results or P/S After Burial: _____

Other Information: _____

Review of Existing Damage Mitigation Measures:

Form K (2 of 2): ILI Root Cause Analysis Report

LINE NUMBER: _____
DATE OF EXCAVATION: _____
MILE POINT: _____
EXAMINATION PERFORMED BY: _____
PROJECT MANAGER: _____
APPROVED BY: _____

ILI LOG DISTANCE: _____
RMP-11 REF. SECTION: 5.8
DIG SITE#: _____

Analysis of Data for Root Cause:

Root Cause of Damage:

Additional Testing, Mitigation and/or Analysis Needed For Long-Term Pipeline Integrity:

Lessons Learned:

Incorporate Into Procedure? Yes No Date: _____
Incorporate Immediately to Future Root Cause? Yes No Date: _____

Recommended Items:

Senior Corrosion Engineer: _____ Date: _____

Approved: _____ Date: _____
Manager, Technical Services

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Form L: (Left Blank Intentionally)

Form M: Exception Report

REFERENCE: _____ SECTIONS 7.0

Line Number: _____

DATE OF EXCEPTION REPORT: _____

IMA NUMBER: _____

PROJECT MANAGER: _____

Paragraph Number of Exception: _____

Requirements of Paragraph (Your own words): _____

Alternative Plan: _____

Reason for Exception: _____

Recommendation: Should the procedure be changed? YES NO

Comments: _____

CI/C Reportable? YES NO

Will this change jeopardize public safety? YES NO

Justification: _____

ILI Engineer: _____

Date: _____

ILI Program Manager: _____

Date: _____

Manager of Technical Services: _____

Date: _____