From:

Evan Vokes

Sent:

Thursday, June 02, 2011 10:39 AM

To:

Ron Wong; Carol Anne Bransby-Williams; John Haley; Bill Yang

Subject:

RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Hi Ron

Any idea why we could not find the records in the interlude

If I was the regulator, I would have a problem with not being able to find the records in 3 months.

Thank you Evan

From: Ron Wong

Sent: Thursday, June 02, 2011 9:59 AM

To: Evan Vokes; Carol Anne Bransby-Williams; John Haley; Bill Yang

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Greetings Everyone, here is a test of your memory all the way back to March (2011) when we met to discuss the wording in the response I'm drafting up. My recollection was to change the wording from:

All closure welds were completed in the best intent to the closure weld procedure that was later adopted and registered with ABSA as part of our 8000 series QC program. Strict compliance (as requested) cannot be confirmed at this time due to the ongoing retrieval of specific records summarizing the welding variables recorded during the joining procedure. We are confident of the existence of these specific records summarizing the welding variables because of the contractors' consistent quality program (ABSA certified) which delivered similar records for other TransCanada projects.

to:

All closure welds were completed in the best intent to the closure weld procedure that was later adopted and registered with ABSA as part of our 8000 series QC program. With respect to the Oakland Bi-Directional Modifications Project, strict compliance (as requested) cannot be confirmed at this time due to the ongoing search for these specific records summarizing the welding variables recorded during the joining procedure. However, based on the existence of similar specific records summarizing the welding variables for three other TransCanada bi-directional modification projects completed by the same contractor, we are confident of the existence of these specific records based on the consistency of contractor's quality program (ABSA certified).

Do you agree with the revised draft response?

Regards, Ron

From: Ron Wong

Sent: Thursday, March 24, 2011 12:17 PM

To: Evan Vokes; Carol Anne Bransby-Williams; John Haley; Bill Yang

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Greetings All,

Going back to ABSA's original request for us to provide:

'a PEng stamped letter indicating that all closure welds were completed in strict compliance with the closure weld procedure that was later adopted and registered with ABSA as part of our 8000 series QC program".

to date we have found:

- (i) weld logs for 31 field welds
- (ii) in-process examination documentation (signed off by the original welding inspector for TC)
- (iii) records summarizing the volts, amps, travel speed, preheat temp, heat input, rod size, rod spec for the other bidirectional projects completed by the same contractor

The probability is high that (iii) exists for Oakland, but the records are currently lost somewhere.

My drafted response to ABSA's request is:

All closure welds were completed in **the best intent** to the closure weld procedure that was later adopted and registered with ABSA as part of our 8000 series QC program. Strict compliance (as requested) cannot be confirmed at this time due to the ongoing retrieval of specific records summarizing the welding variables recorded during the joining procedure. We are confident of the existence of these specific records summarizing the welding variables because of the contractors' consistent quality program (ABSA certified) which delivered similar records for other TransCanada projects.

Do you agree with the drafted response?

Do you think it is a fair admission or a potential trigger for more investigation?

Regards, Ron

From: Evan Vokes

Sent: Wednesday, March 16, 2011 8:16 AM **To:** Carol Anne Bransby-Williams; Ron Wong

Cc: Bill Yang; John Haley

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Hello Everyone

B31.3 does not explicitly state that we must record parameters in their entirety but it is certainly the intent. What is here is defendable with the consideration that when we made the original proposal to ABSA, we had included ToFD inspection to detect root cracking for larger diameter piping and the sample travel sheet is for NPS 2 so we have complied with the original application, with the exception of recorded welding parameters.

ASME did leave the requirement for MT of the root to the designer so the question is there a note requiring MT on the root of the drawing?

The TC requirement for our welding procedures is to continue to weld till the groove is 2/3 full while keeping the heat on is proven to be a successful way to remedy delayed cracking that can occur if we stop to perform a low sensitivity technique such as dry MT in a root.

I really wish the travel sheet had more notes on whether RT or UT inspection was performed.

If there is no note on the drawing that conflicts with this; The argument to make is that the code does not require quantitative assessments, just qualitative and that we have met the intent of the code by with a weld procedure that was adhered to which is designed to minimize chances of cracking the root of the weld.

The worst ABSA can do is make us scan the big welds with ToFD.

Hope this helps Evan

From: Carol Anne Bransby-Williams Sent: Friday, March 11, 2011 1:50 PM

To: Evan Vokes; Ron Wong

Cc: Bill Yang; John Haley

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

FYI - Attached are some example travel sheets for the field welds.

Thanks, Carol Anne

From: Evan Vokes

Sent: Wednesday, March 09, 2011 5:28 PM **To:** Carol Anne Bransby-Williams; Ron Wong

Cc: Bill Yang; John Haley

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Not the whole package for me please Carol,

I would like to see one so we can see if and what we have to do if there are questions.

Can I get a print copy for a single weld?

From: Carol Anne Bransby-Williams

Sent: Wednesday, March 09, 2011 4:39 PM

To: Ron Wong

Cc: Bill Yang; Evan Vokes; John Haley

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Hi All

I touched base with the welding inspector Byron Pliva and he signed all 76 pages (Name, Signature and date). Please let ne know if you would like a copy as the files are huge (about 18 MB each).

Thanks, Carol Anne

From: Ron Wong

Sent: Friday, February 25, 2011 3:10 PM **To:** Carol Anne Bransby-Williams **Cc:** Bill Yang; Evan Vokes; John Haley

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Hi Carol Anne, you need to get your construction manager to sign these sheets for all these field welds. My email trail shows Bob Hall was the construction manager. Can you please track him down?

Thanks, Ron

From: Bill Yang

Sent: Friday, February 25, 2011 1:59 PM

To: Ron Wong; Carol Anne Bransby-Williams; Evan Vokes; John Haley

Subject: RE: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

The FW-1 In-Process Examination Sheets need Owner's Inspector's signatures. Initial Service Leak Test Travel Sheet is also required. Attached is an example of closure weld at Woodenhouse B2.

From: Ron Wong

Sent: Thursday, February 24, 2011 2:48 PM **To:** Evan Vokes; John Haley; Bill Yang **Cc:** Carol Anne Bransby-Williams

Subject: Oakland Bi-Directional Modifications Project 2008 - Closure Welds

Greetings Everyone,

In 2008, piping modifications were made to the Oakland Compressor Station yard piping to enable compressed bidirectional flow. Also in 2008, we submitted a typical design registration package to ABSA and it has unfortunately been overlooked by ABSA. ABSA's subsequent follow-up been a surprise because they are now requesting additional information to what we normally submit in the design registration package. One of the requests is that we provide "a PEng stamped letter indicating that all closure welds were completed in strict compliance with the closure weld procedure that was later adopted and registered with ABSA as part of our 8000 series QC program".

The Oakland Bi-Directional Modifications Project had 31 field welds completed and they have been summarized in the attached weld log document called "Weld Log - TCPL Oakland.pdf". Each field weld has in-process examination documentation (refering to AB-519) and I have attached the in-process examination documentation for field weld FW-1 as an example (sorry for the large file size). I have also attached a weld map document called "Weld map Oakland.pdf" to show the locations of field welds FW-1 to FW-25 (other field welds FW-26 to FW-31 were tie-ins and rerouting of the existing power gas grid system and show on other drawings).

Can you please review the in-process examination documentation for FW-1 as soon as possible and let me know if this meets ABSA's closure weld request?

If you have any questions, please ask Carol Anne or myself.

Regards, Ron From: Evan Vokes

Sent: Tuesday, April 05, 2011 3:49 PM

To: Bill Yang; John Haley
Cc: David Taylor; Robert Lazor

Subject: FW: NGTL Compressor Station Piping Design - ABSA Exemption Letter

Attachments: NGTL ABSA Agreement 1991-07-23.pdf

FYI

This is why we need things to change as it does not reflect current code.

Either we are in gods book or not (Bob Rosenberg) but either way we need to know the mind of NEB so I would keep pressing them.

From: David Taylor

Sent: Monday, March 28, 2011 6:13 PM

To: Evan Vokes; Robert Lazor

Subject: FW: NGTL Compressor Station Piping Design - ABSA Exemption Letter

For your information guys! Evan you are already in discussion with the team on this one!! Over heard you and Bill this morning!!

From: Carol Anne Bransby-Williams

Sent: Wednesday, February 02, 2011 4:17 PM

To: David Taylor

Subject: FW: NGTL Compressor Station Piping Design - ABSA Exemption Letter

Hi Dave

Ron and I had a conference call with Cameron Sterling (ABSA) this afternoon about an application from 2008 that is under review. The project was a bi-directional piping modification at Oakland Compressor Station. Below, Ron summarizes some of our concerns that were raised during the meeting. I am going to set-up a time to talk with you, Jon Haley, Bill Yang and Ron so that we can determine how to proceed.

Feel free to give me a call if you have any questions.

Thanks

Carol Anne (formerly Johnstone ©)

From: Ron Wong

Sent: Wednesday, February 02, 2011 3:54 PM

To: Carol Anne Bransby-Williams

Cc: Bill Yang; John Haley

Subject: NGTL Compressor Station Piping Design - ABSA Exemption Letter

Here is the long standing exemption letter with ABSA that we are still referencing for our compressor station piping design or the NGTL System. The letter is also available in EDMS (ID# 005430634).

As per recent telephone conversation with ABSA, they would like to receive a copy of this letter for review. Also from that conversation, It appears that initiatives are underway to have this long standing exemption letter obsoleted because the letter references CSA Z184-M86 which has been superseded by CSA Z662 in 1994.

The best/preferred outcome would be for TransCanada to receive an updated exemption letter from ABSA which references CSA Z662 instead of CSA Z184.

The worst outcome would be for ABSA to notify TransCanada that the exemption letter is obsolete and no longer applies which would have serious repercussions on TransCanada's engineering guiding principles and on the current NGTL compression capital program (pipe purchase orders for Gold Creek, Berland River, Moody Creek, Hidden Lake North, Swartz Creek, Latornell).

Dave Taylor's group, Materials Engineering Governance & Quality should be included in this potential issue as soon as possible.

Regards, Ron From:

Evan Vokes

Sent:

Wednesday, March 30, 2011 8:26 AM

To:

Bill Yang John Haley

Cc: Subject:

manual ultrasonics

Hi Bill

I am re writing the manual ultrasonic inspection specification
What do I need to include from inservice inspections as per national board requirements

From:

Evan Vokes

Sent:

Tuesday, May 31, 2011 2:46 PM

To:

Greg Szuch

Cc:

Greg Szuch

Subject:

Bill Yang; Patricia Zuczek; John Haley RE: TES WELD AS and utility piping

I had looked at that as well especially with the definition of compressor station in the guidance notes.

The guidance notes only exempt municipal lines

The Order MO is an interesting problem is I am not sure what the intent was.

- a) The basic geometry of a branch leaves us able to inspect part of the volume of the welds.
- b) MT on fillet welds does not allow us to inspect the entire volume of the weld

There is supposed to be an exemption dating back to 2000 for that TES WELD AS was written to comply which is why I am assuming it has never been question by the board

Dave Taylor is asking some questions to get the correct reference.

From: Greg Szuch

Sent: Tuesday, May 31, 2011 1:14 PM

To: Evan Vokes

Cc: Bill Yang; Patricia Zuczek; John Haley
Subject: RE: TES WELD AS and utility piping

The primary question I have (right now) is related to section 17 of the Onshore Pipeline Regulations which states:

Nondestructive Examination

17. When a company conducts joining on a pipeline, the company shall examine the entire circumference of each joint by radiographic or ultrasonic methods.

I was looking at the guidance notes for the OPRs and found this.

The Board has issued case-specific exemptions from the 100% nondestructive examination requirement of section 17 and Order MO-08-2000 pursuant to <u>subsections 48(2.1) and 48(2.2)</u> of the Act. These exemptions have been for certain specific auxiliary piping systems associated with stations.

This would seem to imply that everything is in, unless we apply for an exemption under the NEB act.

From: Evan Vokes

Sent: Tuesday, May 31, 2011 9:41 AM

To: Greg Szuch

Cc: Bill Yang; Patricia Zuczek; John Haley Subject: TES WELD AS and utility piping

To confirm our conversation Greg

The utility piping was addressed in TES-WELD-AS for many board submissions.

Traditionally this has been left up to the PM to decide so the prime contractor has directed this NDE with results that we have discussed.

My assumption is the board has been looking much closer at their responsibilities so we are having examination of items that have been accepted in the past.

If you have an IR this is one more example of the NEB taking a closer look as we give them a rich field to explore with little effort.

We have been questioned on meter station field welds, weld procedures and the list goes on and the board keeps finding things so I would be pretty forward to the board with this.

I know it goes against TC practice but I would recommend that you provide the utility piping NDE as a minimum of 15% to the submission to the board. Define what utility piping is in the submission and point to the specification because any line however small with high pressure should be examined but there is no need for others as the lead.

It is time to get ABSA out of the picture or have responsibility novated from the board to ABSA so this is a time to pursue clarity from the board on what ABSAs future roles and responsibility will be.

I can't see why we should have there involvement but we need to keep a better house on our part as well.

Bill, John: do you have any comments?