

PG-080098



Georgia-Pacific

CONSUMER PRODUCTS (CAMAS) LLC

401 NE Adams Street, Camas, WA 98607

Telephone: (360) 834-3021

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 21, 2008

Mr. David Danner
Executive Director
Washington Utilities & Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Dear Mr. Danner:

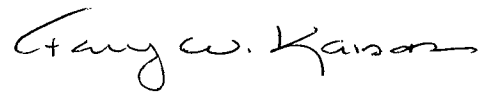
Pursuant to Docket PG-080098, your November 17, 2008 letter identified an area of concern focused on pipeline welder qualifications (40 CFR 192.227). We reviewed our records and confirmed that two of our three welders were qualified under the 18th and the 19th Editions of API 1104 (please see the attachment). The third welder (Ron Higdon) was not qualified. As a result of this finding, Mr. Higdon was barred from pipeline welding until a 19th Edition test was completed. It bears mentioning that none of the welders, including Mr. Higdon, has ever welded on this gas transmission pipeline. On November 6, 2008, Mr. Higdon successfully completed his 19th Edition test. The Acuren Radiographic Examination Report (please see the attachment) concluded that the weld was acceptable. In addition to the welder retest, we reviewed the welding procedure in our Operations, Maintenance, and Procedures Manual. It correctly specified that welders must meet the standards of Section 6 of API 1104 (19th Edition).

If you have any questions concerning this submission or need additional information, please contact Steve Young at 360-834-8322 or steve.young@gapac.com. We would like to express our appreciation to WUTC Staff for conducting the recent compliance audit in a positive and productive manner. Open discussion resulted in several

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STATE OF WASH.
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COMMISSION
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operation and maintenance manual changes that helped us improve our procedures. Since pipeline construction, the mill has taken a proactive approach to pipeline operating safety. This philosophy combined with help and direction from the WUTC has resulted in 16 years of incident free operation.

Sincerely,

A handwritten signature in black ink that reads "Gary W. Kaiser". The signature is written in a cursive style with a large, sweeping "G" and "K".

Gary W. Kaiser
Vice President

GWK/jm

Attachment

cc:

S. R. Young - GP/Camas

P. Johnson - WUTC/Olympia



ACUREN

8155 SE Deer Creek Lane
Milwaukie, Oregon 97222-9314
Phone: 503 652-8878
Fax: 503 652-8887

Materials Engineering and Testing
A Rockwood Company

11-5-08

To Whom It May Concern:

This letter is in regards to a Radiographic Examination that was done at our Milwaukie, Oregon lab Service Call# 24046. This job was to perform Radiographic Examination on (3) 10" pipe welds for GP Camas per API 1104 18th Edition.

The radiographic examination report showed that welders M. Woolridge & R. Howe passed and R. Higdon failed per API 1104 18th Edition. If these were interpreted to API 1104 19th Edition the results would be the same. If you have any further questions or concerns, please call or e-mail me.

Sincerely,

Nate Tetrick

Shop Supervisor, Portland, Oregon

Acuren Inspection Inc.

Materials Engineering & Testing

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Materials Engineering and Testing
A Rockwood Company

3101 111th St. SW, Unit C
Everett, Washington 98204
(425) 355-5019

Date: 11/6/2008

Page 1 of 1

Radiographic Examination Report

CUSTOMER/CONTACT	GP-Camas	SC#	24466
LOCATION/ADDRESS	Camas, Washington	P.O.	665042
UNIT/SYSTEM	10" Pipe Samples		

MATERIAL	A	B	C	D	E				
C/S						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
THICKNESS	3/8"								
DIAMETER	10"								
REINF. THICKNESS	1/8"								
STO	10"					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTF	1/2"								
EXPOSURE TIME	.45 secs.								
IQI SIZE/MATERIAL	B Wire								
IQI LOCATION (S/F)	F								
SHIM THK & MAT'L	N/A								
# OF EXPOSURES	3 Per.								
MARKERS: NBR OR SPACING	0-1 A 1-2,2-0								

SOURCE	ci	KV	Ma	FOCAL SPOT	SCREENS	FILM LOADING	FILM PROCESS:
<input checked="" type="checkbox"/> Ir	69.7	N/A	N/A	.167"	FRONT .010" REAR .010"	<input checked="" type="checkbox"/> Single <input type="checkbox"/> Double	TIME 9 Mins.
<input type="checkbox"/> Co	NDE PROCEDURE		ACCEPTANCE STANDARD		SURFACE CONDITION		TEMP 30°C.
<input type="checkbox"/> X-Ray	All RT-3 Rev. 0		API- 1104 Sec. 6 19th Edition		As Welded		<input checked="" type="checkbox"/> AUTO <input type="checkbox"/> MANUAL

STAGE OF MANUFACTURE INTERMEDIATE FINAL REPAIR BEFORE PWHT AFTER PWHT

C - CRACK CP - CLUSTER POROSITY IP - INSUFFICIENT PENETRATION EU - EXTERNAL UNDERCUT SU - SURFACE
 SL - SLAG P - POROSITY/GAS POCKET IF - INSUFFICIENT FUSION IU - INTERNAL UNDERCUT HL - IP DUE TO HIGH/LOW
 T - TUNGSTEN HB - HOLLOW BEAD EP - EXCESSIVE PENETRATION IC - INTERNAL CONCAVITY BT - BURN THROUGH

WELD	VIEW	DENSITY		ACC	REJ	LIST INDICATIONS	WELDER ID - OTHER ID - REMARKS
		PEN	WELD				
Ron Higdon	0-1	2.38	2.38	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Por, Sl, Film Art, Surf.	
	1-2	2.86	2.86	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Por	
	2-0	2.78	2.78	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CP, EU	
				<input type="checkbox"/>	<input type="checkbox"/>		
				<input type="checkbox"/>	<input type="checkbox"/>		
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				<input type="checkbox"/>	<input type="checkbox"/>		
				<input type="checkbox"/>	<input type="checkbox"/>		
				<input type="checkbox"/>	<input type="checkbox"/>		

<input type="checkbox"/> ADDITIONAL PAGES	COMMENTS:	FILM BRAND/TYPE	TOTAL # OF WELDS
# OF FILM AND SIZE		AGFA D4	1
(3) 4 1/2" X 17"			
Date	Customer Contact	Per Diem	Report No.
11/6/2008	Pat Terry	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	24046
			Unit #
			Shop
			No. on Job
			1
Travel if Applicable	Airlines	Hours:	Total Hrs
Hours:	Vehicle	Worked	
Miles Total:		to AM and	to PM

Signature of Customer's Representative certifies time and material correct _____
 Name, Signature, and Level of Acuren Examiner _____ Assistant

TABLE 1. AN EXCERPT FROM THE GEORGIA-PACIFIC NATURAL GAS PIPELINE OPERATIONS AND MAINTENANCE MANUAL

4.7.3 Welder Qualifications

Georgia-Pacific welders must be qualified by preparing a test weld in accordance with Section IX of the ASME Boiler & Pressure Vessel Code. In order to maintain the required qualification, the welders shall perform a weld using the specified pipeline welding procedure once in a six month period. This weld shall be tested by radiography and shall meet compliance standards in Section 6 of API 1104 (19th edition).

Georgia-Pacific welders are required to have onsite when welding, the specific weld procedure that will be followed and a copy of their last ASME qualification test report.