

## PENALTY CALCULATION WORKSHEET

**Docket:** PS11-002

**Operator:** NorthWestern Energy

**Date Prepared:** December 19, 2011

**Prepared by:** Nathan Solem

**Violations:** §192.225 a

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code " Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).

When inspector arrived to observe welders in the early pm of October 31, the inspector observed that the hot pass welder did not complete his pass within 5 minutes of the root pass per welding procedure GTS-WPS-BW3 in use. Concerned that this may have been due to crew stopping to introduce themselves to the inspector, the inspector inquired and learned this may have happening regularly. Welding temperatures were taken to ensure that the weld was still warm (temp was 236, above the preheat level of 200). Although the weld was fine, welders must follow procedure regardless of potential interruptions. This contractor was observed violating this same procedure in 2007 although it was a different welder. Operator must develop a method to ensure contractor welders follow welding procedures.

**Total Proposed Penalty:** \$2,191