
From: David Taylor
Sent: Thursday, October 20, 2011 8:12 PM
To: Evan Vokes; Jim Platt; Cindy Guan
Cc: Grant Kowpak; Darren McLean
Subject: RE: Peerless vessel

Evan,
Did you include our Facilities Integrity department personnel (Bill Yang and John Haley) in this conversation with ABSA?
Did you contact the Company Regulatory department for guidance on this matter?

Please let me know.

Thank you

Dave

From: Evan Vokes
Sent: Thursday, October 20, 2011 10:03 AM
To: Jim Platt; David Taylor; Cindy Guan
Cc: Grant Kowpak
Subject: Peerless vessel

Hi Everyone

Yesterday Jim and myself had agreed that I should phone Material and Design at ABSA yesterday and this meeting with ABSA was very productive
I talked with Bruce McWhirter and Mick Poelhman and it made it much easier to clear up a memo that I have been working on and I need to finish writing

The short news is, if we specify our inspection, it is mandatory under the code and that means I must meet the code in my response

If we want to write a variance to our specification for method or other special requirements that are included in the code that is up to us.

The foreword in the code is the part that is the stumbling block as almost all of our vessels are simple but we operate at a much higher pressure than most owner users.

I did ask that famous question if ABSA cares and both Bruce and Mike were adamant that they do care about inspections of Cat D nozzles. There are some issues with how ABAS handles inspections of Cat D but the Materials and Design group care.

No matter what we do, if we cannot make a code inspection for the nozzles and want to accept the vessels we have to variance to one of two choices

- a) delete the requirement for Cat Ds. This was forbidden by management already as they stated that they did not want a repeat of Edson. It is still an option but if there is a failure, we will be back justifying our engineering practice with the regulator.
- b) Radiography. We can write a variance to the specification and still be within the limits of the code and ABSA's concerns.

This means if our NDE provider can prove film sensitivity. We are good. Jim had Acuren doing some prework yesterday. The problem is the source must be held very steady to meet sensitivity requirements we will know soon if this is practicable.

Mike Poelman will be talking to their Authorized inspectors (AI) about NDE requirements. There is no specific promise of what will happen but he is very open to the inspection needs of users that are not related to process fluid engineering concerns. Mike and Bruce did tell me about the detail the AI looks at vessels I will be asking Mike to give me a bit more in depth so we understand if Moody process is replicating the inspection that ABSA has done. In other jurisdictions, Moody

will always be responsible for the full inspection. to understand the context of the AI duties, there are areas that AI will never look at as they only look at the RT record, never the film so this becomes our 3PI problem.

Thank you
Evan