

**Line 3 Replacement Project**  
**PERMIT COMPLIANCE FILING**

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**Permittee:** Enbridge Energy, Limited Partnership  
**Permit:** Route Permit  
**Docket No.:** PL-9/PPL-15-137  
**Permit Section:** Section 8.6 – Abandonment Plan  
**Date of Submission:** May 5, 2020

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Enbridge Energy, Limited Partnership (“Enbridge”) submits this compliance filing under Section 8.6 of the Route Permit, which states:

**8.6 Abandonment Plan**

The Permittee shall file with the Commission a public version of the most recent existing Line 3 abandonment report prepared in accordance with 49 CFR 195.59. The Plan shall be filed with the Commission at least 60 days prior to the first plan and profile submission as described in Section 4.8 of this Permit.

Code of Federal Regulation

For reference, the applicable federal regulation states:

*§195.2 Definitions.*

*Abandoned means permanently removed from service.*

*§195.59 Abandonment or deactivation of facilities.*

*For each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway, the last operator of that facility must file a report upon abandonment of that facility.*

*(a) The preferred method to submit data on pipeline facilities abandoned after October 10, 2000 is to the National Pipeline Mapping System (NPMS) in accordance with the NPMS “Standards for Pipeline and Liquefied Natural Gas Operator Submissions.” To obtain a copy of the NPMS Standards, please refer to the NPMS homepage at <http://www.npms.phmsa.dot.gov> or contact the NPMS National Repository at 703-317-*

3073. A digital data format is preferred, but hard copy submissions are acceptable if they comply with the NPMS Standards. In addition to the NPMS-required attributes, operators must submit the date of abandonment, diameter, method of abandonment, and certification that, to the best of the operator's knowledge, all of the reasonably available information requested was provided and, to the best of the operator's knowledge, the abandonment was completed in accordance with applicable laws. Refer to the NPMS Standards for details in preparing your data for submission. The NPMS Standards also include details of how to submit data. Alternatively, operators may submit reports by mail, fax or e-mail to the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, Information Resources Manager, PHP-10, 1200 New Jersey Avenue, SE., Washington, DC 20590-0001; fax (202) 366-4566; e-mail, "InformationResourcesManager@phmsa.dot.gov. The information in the report must contain all reasonably available information related to the facility, including information in the possession of a third party. The report must contain the location, size, date, method of abandonment, and a certification that the facility has been abandoned in accordance with all applicable laws.

(b) [Reserved]

[Amdt. 195-69, 65 FR 54444, Sept. 8, 2000, as amended at 70 FR 11140, Mar. 8, 2005; Amdt. 195-86, 72 FR 4657, Feb. 1, 2007; 73 FR 16570, Mar. 28, 2008; 74 FR 2894, Jan. 16, 2009]

§195.402 *Procedural manual for operations, maintenance, and emergencies.*

(a) *General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.*

...

(c) *Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:*

...

(10) *Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned facilities left in place to minimize safety and environmental*

*hazards. For each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through commercially navigable waterways the last operator of that facility must file a report upon abandonment of that facility in accordance with §195.59 of this part.*

### Abandonment Plan

In accordance with 49 CFR 195.59 (Abandonment or deactivation of facilities), Enbridge reviewed the waterbody crossings as provided in the NPMS system and determined that the existing Line 3 pipeline does not cross any waterbodies that are classified as commercially navigable waterways. Therefore, an abandonment report was not filed for the two segments of existing Line 3 abandoned following replacement in North Dakota or Wisconsin. Because existing Line 3 does not cross commercially navigable waterways, Enbridge does not anticipate submitting an abandonment report to PHMSA or the NPMS system following the replacement of Line 3 in Minnesota or the remainder of North Dakota.

For reference, Enbridge has attached the following portions of the current version of its Procedural Manual<sup>1</sup> (maintained pursuant to 49 CFR 195.402(c)(10)) related to abandonment:

- Book 3: Pipeline Facilities
  - Section 6: Pipe Repair & Modification
    - 06-03-02: Cold Cutting the Pipe
    - 06-03-06: Purging & Blowdown with Nitrogen
- Book 4: Welding
  - Section 2: Maintenance & Repair Welding
    - 02-02-02: Welding on Mainlines

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<sup>1</sup> The Procedural Manual establishes procedures for activities assuming a pipeline is operational at the time the activities occur. Given that existing Line 3 will be permanently removed from service and all oil will be purged from the pipeline prior to abandonment, procedures used for abandoning Line 3 may vary slightly from the Procedural Manual.



**Purpose**

To cold cut isolated in-service, abandoned-in-place (AIP) or decommissioned piping for repair, modification or removal.

**Related Standards**

**Company**

Book 1: General Compliance Reference

- [04-02-02 Recordkeeping](#)
- [04-02-02-A1 Operations & Maintenance Recordkeeping List](#)

Book 3: Pipeline Facilities

- Tab 04 Trenching and Excavations
- [06-03-01 Grounding Pipe for Induced Voltage](#)
- [06-03-03 Drainup & Linefill](#)
- [06-03-06 Purging the Pipeline with Nitrogen](#)
- [06-03-21 Installing Bonding Cables](#)

**Related Forms**

**Company**

- [Open System Job Planning Template](#)

**Requirements**

**Prerequisites**

For AIP or decommissioned piping, an [Open System Job Planning Template](#) may be required by regional management if the hazards (i.e., oil toxic atmosphere, ignition sources) are unknown or if they are known and significant in nature.

Low risk pipe cutting with non-present or mitigated hazards may be completed on the Field Level Hazard Assessment (FLHA).

**Procedure**

**Cold Cutting the Pipe**

1. Before using pipe saws refer to manufacturer's specifications/instructions.
2. Check pipe for induced voltage (see [06-03-01 Grounding Pipe for Induced Voltage](#)).
3. Remove pipeline coating.
4. Clean immediate area.
5. Ensure proper support of section to be cut.
6. Prepare to make cut:
  - confirm fluid level in pipe at cut location
  - review product inventory estimated volumes in the [Open System Job Planning Template](#), if applicable
  - allow extra pipe if additional hot cut is to be made

- install bonding cables (see *06-03-21 Installing Bonding Cables*) between upstream and downstream pipe sections and to pipe section
  - mount cutter on pipeline
7. Ensure fire extinguishers are ready and the fire watch is on alert.
- two 30# dry chemical extinguishers must be onsite.

**⚠ WARNING:** The pipe may spring suddenly as the cut completes. Watch both sections of pipe for movement or binding, and add or change supports as necessary.

**⚠ CAUTION:** Do not use air or hand-operated saws at speeds that create pipe surface temperatures over 121°C (250°F).

8. Cold cut pipe in accordance with manufacturer's specifications/instructions.
9. Monitor both sections of pipe during cutting for signs of movement or binding. Wedge open as necessary to prevent binding of cutter wheel.

**⚠ CAUTION:** As the cut nears completion, the pipe may twist or demonstrate stress that could cause the pipe to tear and possibly damage the saw. Consider raising the blade and moving the saw into the center of the remaining uncut section.

10. Complete cut.
- if mainline pipe is subject to compressive forces, section may continue to be securely bound through frictional forces with mainline pipe
  - additional cuts may be necessary to obtain necessary clearance for removal
11. Remove cutter.
12. Complete drainup if there is any product remaining in pipe.
13. Lift pipe section from ditch.
14. Remove bonding cables when pipe clear of hazardous area.
15. Place pipe in a safe location on right-of-way (ROW) away from worksite.
16. Tag pipe, if required.

17.

**⚠ WARNING:** If manual handling is required, consider other means to prevent lacerations before considering filing (i.e., cover edge with a split rubber hose or protective barrier) as metal tool usage with an open system may create an ignition source.

18. Inspect inside of cut out pipe for internal corrosion.

19. To determine if further analysis is required, contact Pipeline Integrity

20. Seal existing tie-in pipe end with an internal sealing device to prepare pipe end for hot work and install vapor tools on any other exposed pipe ends to prevent harmful and/or potentially explosive vapors from entering area.

21. It is recommended that a 2-in mud seal be packed around outside perimeter of internal sealing device for additional protection against welding sparks landing against sealing element.

#### Records

Retain the following records in accordance with [B1\\_04-02-02 Recordkeeping](#) (see [B1\\_04-02-02-A1 Operations & Maintenance Recordkeeping List](#) for specific retention information):

- Open System Job Planning Template

**DOCUMENT CHANGE LOG**

Version 14.0	Version 15.0	Justification
<p><b>Procedure</b> WARNING: If manual handling is required, consider filing sharp edges of the pipe or cover with a split rubber hose to prevent lacerations.</p> <p>17. Inspect inside of cut out pipe for internal corrosion.</p> <p>18. To determine if further analysis is required, contact Pipeline Integrity</p> <p>19. If pipe end will be exposed prior to mud plug installation, an internal sealing device (i.e., Foreman Plug, sealing sphere) should be placed in each open pipe end to prevent harmful and/or potentially explosive vapors from entering area.</p> <p>20. It is recommended that a 4-in mud seal be packed around outside perimeter of internal sealing device for additional protection against residual vapors.</p>	<p>Procedure WARNING: If manual handling is required, consider other means to prevent lacerations before considering filing (i.e., cover edge with a split rubber hose or protective barrier) as metal tool usage with an open system may create an ignition source.</p> <p>17. Inspect inside of cut out pipe for internal corrosion.</p> <p>18. To determine if further analysis is required, contact Pipeline Integrity</p> <p>19. Seal existing tie-in pipe end with an internal sealing device to prepare pipe end for hot work and install vapor tools on any other exposed pipe ends to prevent harmful and/or potentially explosive vapors from entering area.</p> <p>20. It is recommended that a 2-in mud seal be packed around outside perimeter of internal sealing device for additional protection against welding sparks landing against sealing element.</p>	<p>19. clarification as to which pipe this refers to (cutout pipe or existing pipe), Foreman plugs cannot be used to contain vapors.</p> <p>20. correlate with the vapor tool procedure which recommends 2" around the seal.</p>

**Minor Revision (Version 15.1)**

**Records**

Replaced retention information with reference to central record standard and list to minimize inconsistency and to increase information management efficiency.



**Purpose** To displace liquids from a section of pipe by injecting nitrogen between two pigs to allow removal, replacement or deactivation of mainline pipe, valves or fittings. Portions of this procedure should also be used for similar applications when nitrogen is being used.

**Scope** This applies whenever nitrogen is used in the liquids pipeline.

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**NOTE:** Before using an alternate purging medium, obtain approval from the Vice-President of Operations.

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**Related Standards**

**Company**  
Book 3: Pipeline Facilities

- Tab 04 Trenching and Excavations
- [08-02-06 Pipeline Tool Sending & Receiving](#)

**Industry**  
Canadian Standards Association (CSA):

- CSA Z662— Oil and Gas Pipeline Systems

**Requirements**

**Approval**  
Approval may be required from government agencies depending on the magnitude of the job, the need to reduce nitrogen pressure following the purge and during subsequent linefill. Contact Environment for assistance.

Workers must wear hearing protection at nitrogen blowdown sites.

**Communication**  
Maintain communication with the control center, and advise them of critical changes as they develop before, during and after the nitrogen purge.

**Monitoring**  
Prior to starting the nitrogen purge until the purge, is completed, assigned personnel at the downstream pump station may monitor station suction pressure, pump vibration levels and related instrumentation to ensure nitrogen does not enter the station.

Nitrogen blowdown and injection sites must be monitored for oxygen deficiency.

**Coordination with the Control Center**  
Establish nitrogen volume requirements and estimate throughput displacement with the control center.

Establish a procedure that details the timing and sequence of events with the control center regarding batch type, size, flow rates, station bypasses and potential impacts on throughput as well as N2 injection and vent points.

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Purging & Blowdown with Nitrogen - Liquids

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### Notification

Obtain necessary access routes and adequate work space from adjacent landowners.

Notify landowners and public authorities having jurisdiction in the affected areas of potential noise, odors, and additional traffic.

If blowdown is necessary in populated areas, consider using silencers or liquid knock-out tanks to minimize noise impacts.

### Procedure

### Purging and Blowdown with Nitrogen

**NOTE:** Operator Qualification is required when purging the pipeline with nitrogen in liquids pipelines in the U.S.

 **WARNING:** Petroleum vapors or other hazardous materials may be released during purging.

### Site Preparation

1. Review excavation guidelines before proceeding (see *Tab 04 Trenching and Excavations*).
2. If necessary, expose pipeline at nitrogen injection point, blowdown locations and mainline worksite locations:
  - if pig sigs are used, additional excavation at upstream and downstream block valves may be required
3. Establish listening posts upstream of nitrogen injection point, or arrange for continuous pig tracking to warn the control center that purge pig is approaching:
  - if purge terminates at a mainline station, establish a listening post upstream of station to coordinate shutting down station and opening valves to allow mainline flow past station
4. Check and record all valves that will be operated during nitrogen purge:
  - ensure valves are operational either by manual or push button control
  - ensure valves through which a pig must pass unattended are fully open and, if possible, locked in position
5. Either just before purge or immediately after closing valve, if necessary, inject valve sealant in upstream and downstream block valves.
6. Position blowdown tanks at a safe distance from excavation and worksite.
7. Install vents, piping for blowdown tanks and pig sigs.

8. Firmly secure all temporary piping to minimize risk of whipping during blowdown.

### ***Pig Launching***

1. Refer to *08-02-06 Pipeline Tool Sending & Receiving*.
2. Verify pig separation with the control center:
  - generally, use 60–120 m (200–400 ft) of oil to separate pigs.
3. Mount tracking transmitters and noisemakers, if needed, to both lead pig (purge pig) and following linefill pig:
  - each electronic tracking device must have an independent frequency to allow identification of each pig
  - nitrogen purging of traps is required when sending or receiving tools containing electrical power sources (including inspection tools and other tools with battery-powered transmitters) unless transmitters are mounted in intrinsically-safe cases
4. Launch purge pig and linefill pig approximately 60–120 m (200–400 ft) apart:
  - to ensure proper separation, advise the control center to shut down line after launching purge pig (this allows time to load linefill pig)
  - pigs tend to separate during purge as nitrogen bypasses upstream pig
  - adequate pig separation must be maintained to allow upstream block valve to close between purge and linefill pigs
  - additional separation may be necessary to allow for pig slippage during travel

### ***Pig Tracking***

1. Verify pig separation at a location just downstream from launching site.
2. Once line rate stabilizes, verify pig separation and confirm mainline rate with the control center.
3. Approximately 1 hour before purge pig arrives at upstream block valve (nitrogen injection point), verify that:
  - nitrogen pumpers are starting cool down period
  - flow rate has been reduced until purge pig passes injection point
4. Approximately 10 min before pig arrives at upstream block valve, initiate an open line of communication with the control center:
  - an open line of communication enables workers to advise the control center of desired rate reductions and eventual line shutdown
5. Prior to lead pig arriving at upstream block valve:

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- alert onsite workers to be prepared to close upstream block valve and to start nitrogen injection
- advise the control center to shut down mainline pumping units

***Nitrogen Injection***

1. When purge pig passes nitrogen injection point, close upstream block valve and begin nitrogen injection.

 **WARNING:** Secure pipe and hoses with whip check connections or steel braid line wrap, or stake them to the ground.

2. Stake exact location of linefill pig, which should be upstream of just-closed block valve.
3. Confirm that nitrogen injection is online and steady.
4. Advise the control center to start line downstream of injection, if applicable.
5. Ensure all quick-opening ball valves on nitrogen injection piping are fully open and are chained and locked to prevent closure.
6. Monitor suction pressure and vibration levels at pump station immediately downstream:
  - keep in communications with the control center until situation stabilizes (2 to 3 min)
  - continue to communicate on an intermittent basis

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**NOTE:** Every effort should be made to maintain the specified line rate and suction pressure at the downstream station. Although suction pressure will fluctuate during the purge, throughput should not be significantly higher or lower than design calculations.

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7. Track purge pig as it approaches downstream block valve at following critical locations:
  - at least 3 min upstream when purging up to a station
  - at injection stop point
8. When purge pig passes downstream block valve:
  - a) notify the control center to immediately shut down line
  - b) close valve
  - c) stop the nitrogen injection
9. If downstream block valve is located at a mainline station:
  - a) when purge pig reaches 6-min location upstream of station, isolate station to prevent nitrogen from entering station
  - b) when pig passes station bypass valve, shut down line and close valve

- c) if purge pig stops upstream of station bypass valve, it may be necessary to drain up section between 3-min location and station bypass valve

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**NOTE:** The 3-min interval is based on valve travel time of 3 minutes, therefore, if any valves have a different travel time to close, alter the time interval to suit.

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- 10. Lock out upstream and downstream block valves (see *Book 2: Safety, Tab 06 Lockout*).
- 11. For additional isolation, close upstream and downstream valves adjacent to locked-out block valves for purged section.

***Blowdown***

- 1. Ensure blowdown tanks are in place.
- 2. Ensure there are adequate vent openings on tank for intended blowdown rate.
- 3. Once purged section is isolated, begin nitrogen blowdown.
- 4. Open blowdown valves slightly to ensure product will not be released to atmosphere upon blowdown:
  - if product is present, blowdown must be done through a liquid knock-out tank or other device to eliminate misting
  - if product is not present, blow down pipeline through blowdown tanks or vacuum trucks
- 5. Observe line pressure to monitor rate of pressure decrease until purge is complete.

***Linefill***

- 1. Open upstream and downstream valves that were closed for extra security.
- 2. If filling from a mainline valve, inject nitrogen in purged section to pressurize to provide adequate backpressure for linefill operations, or monitor backpressure locally and maintain communication with the control center to avoid the upstream line pressure dropping below the minimum:
  - the control center should be consulted to determine appropriate backpressure required

**⚠ CAUTION:** Actual or potential pressures must be communicated to field operations to ensure facilities, including temporary facilities, are adequately pressure rated.

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3. Remove lockout.
4. Open upstream block valve slowly.
5. Allow pressure to stabilize.
6. Advise the control center to start up line upstream of purged section.
7. If mechanical vapor plugs were used for tie-in, maintain adequate pressure to automatically release them.
8. Control venting nitrogen from pipeline to maintain adequate back pressure ahead of linefill pig.
9. Shut down upstream mainline units prior to linefill pig approaching downstream block valve.
10. Continue to vent nitrogen until product is observed at vent location.
11. Leave block valve closed, as necessary, to allow nitrogen to separate from product:
  - repeat several times until there is no more solution
12. Remove lockouts and open downstream block valve.
13. Continue venting while using a sample line connection to check for petroleum vapor or liquid:
  - if vapor is present, control vent valve and continue venting into blowdown tank until liquid appears. Repeat as many times as needed to maximize vapor removal
  - remove as much nitrogen and vapor as possible.
  - it may be necessary to adjust linefill rate to ensure a thorough blowdown of vapors
  - additional downstream blowdown sites may be required if nitrogen cannot be adequately vented at primary site
14. Track pig train to downstream receiving trap.

**DOCUMENT CHANGE LOG**

Version 14.0	Version 15.0	Justification
<p><b>Procedure</b>  <b>Pig Launching</b></p> <p>1. Verify pig separation with the control center:  <input type="checkbox"/> generally, use 60–120 m (200–400 ft) of oil to separate pigs.</p> <p>2. Mount tracking transmitters and noisemakers, if needed, to both lead pig (purge pig) and following linefill pig:  <input type="checkbox"/> each electronic tracking device must have an independent frequency to allow identification of each pig.</p>	<p><b>Procedure</b>  <b>Pig Launching</b></p> <p>1. Refer to 08-02-06 Pipeline Tool Sending &amp; Receiving.</p> <p>2. Verify pig separation with the control center:  <input type="checkbox"/> generally, use 60–120 m (200–400 ft) of oil to separate pigs.</p> <p>3. Mount tracking transmitters and noisemakers, if needed, to both lead pig (purge pig) and following linefill pig:  <input type="checkbox"/> each electronic tracking device must have an independent frequency to allow identification of each pig  <input type="checkbox"/> nitrogen purging of traps is required when sending or receiving tools containing electrical power sources (including inspection tools and other tools with battery-powered transmitters) unless transmitters are mounted in intrinsically-safe cases</p>	<p><b>OMS-REQR-00602</b>  Technical update.</p>



## Related Standards

### Company

Book 1: General Compliance Reference

- [04-02-02 Recordkeeping](#)
- [04-02-02-A1 Operations & Maintenance Recordkeeping List](#)

Book 3: Pipeline Facilities

- [01-02-03 Capacity Outage Planning & Safe Work Approval](#)
- [06-02-01 Pipeline Repairs](#)

## Requirements

### Maximum Operating Pressure

During welding on in-service pipe where wall thickness (WT) is greater than or equal to ( $\geq$ ) 6.35 mm (1/4 in.), internal pressure may be up to 100% maximum operating pressure (MOP) (i.e., a pressure restriction may not be required). During welding on in-service pipe where WT is less than 6.35 mm (1/4 in.), pressure restrictions may apply if called for in the Weld Procedure Datasheet. If magnetism is observed during welding preparation or while welding, a pressure restriction to 50% may be requested.

To maintain recommended pressures during welding, postpone any electrical or mechanical maintenance work that could inadvertently affect pressures until welding is complete.

On nitrogen-filled piping, circumferential or branch fillet welds can be made without reducing the nitrogen pressure and with no risk of burn-through or hydrogen-induced cracking, provided approved welding procedures are used.

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**NOTE:** During welding on a pipe containing liquid hydrocarbons, the pipe must be completely filled eliminating any vapor space. Alternatively, the inside of the pipe may be purged with nitrogen or cleaned and determined to be vapor free prior to welding.

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### Welding on NGL, Refined Product and Chilled Product Lines

In-service welding on lines containing NGL or refined products is to be avoided. If it is absolutely necessary to weld on a line containing NGL, consult Pipeline Integrity. An In-Service Heat Sink Capacity Test may be requested.

In-service welding on Lines with contents flowing at a temperature less than 5°C must use only UF-93 and UN-94. If weld parameters fall outside the limits of these procedures, consult Pipeline Integrity.

### Maintenance Scheduling

For information on scheduling mainline welding that affects line operations or requires pressure restrictions (e.g., hot taps, repair sleeves), see [Book 3: Pipeline Facilities 01-02-03 Capacity Outage Planning & Safe Work Approval](#).

## **Communication**

### ***Before Work***

The site contact must establish communication between the site and the control centre.

Prior to starting welding the site contact must verbally contact the control centre prior to commencing welding.

The control centre will confirm the safe line condition and give authorization to begin welding.

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**NOTE:** The control center will adjust the line to safe welding pressures and ensure the scheduled operations are steady through the welding period.

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### ***During Work***

The site contact should contact the control centre at regular intervals dictated by job and line conditions.

The site contact must contact the control centre at completion of the welding.

### ***Work Stoppage***

If pressure exceeds recommended levels while work is in progress, the control center will notify the site contact to stop work immediately until pressure has stabilized at or below an acceptable limit.

### ***Work Completion***

The site contact must contact the control centre at completion of the welding.

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**NOTE:** The control center will not resume normal operations until the message is received.

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## **Documentation**

The Operations supervisor or designate must record the following information in the COPAS request:

- welding start time
- welding interruptions due to pressures that exceed recommended levels
- welding completion time

When work is complete, the Operations supervisor must forward the applicable nondestructive examination (NDE) reports and field repair reports to Pipeline Integrity.

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**NOTE:** For information on field repair reports, see [Book 3: Pipeline Facilities 06-02-01 Pipeline Repairs](#).

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**Records**

Retain the following records in accordance with [BI\\_04-02-02 Recordkeeping](#) (see [BI\\_04-02-02-A1 Operations & Maintenance Recordkeeping List](#) for specific retention information):

- Field Repair Report
- Mainline Welding Documentation
- Nondestructive Examination (NDE) Report

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**DOCUMENT CHANGE LOG**

**Minor Revision (Version 16.1)**

***Records***

Replaced retention information with reference to central record standard and list to minimize inconsistency and to increase information management efficiency.