



March 1, 2021

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First St., N.E.
Washington, D.C. 20426

Re: National Grid LNG LLC, Docket No. CP16-121-000
Fields Point Liquefaction Project
Monthly Status Report for February 2021

Dear Secretary Bose:

On October 17, 2018, the Commission issued the Order Issuing Certificate (“Certificate Order”) granting a certificate of public convenience and necessity to National Grid LNG LLC (“National Grid”) in the above captioned docket for the Fields Point Liquefaction Project (the “Project”). *National Grid LNG LLC*, 165 FERC ¶ 61,031 (2018). National Grid filed its acceptance of the certificate of public convenience and necessity on October 29, 2018 and the Implementation Plan was filed on November 1, 2018. As required by Environmental Condition 8 of the Certificate Order, National Grid is submitting the Monthly Status Report for the February 2021 reporting period.

Pursuant to Section 388.113 of the Commission’s regulations, National Grid requests nonpublic treatment of the CEII documents contained in this submission so marked. The materials marked as “CUI//CEII” concern specific engineering and design information about the proposed liquefaction facilities that is customarily treated by the Commission as critical energy infrastructure information because it could be useful to a person planning an attack on critical infrastructure. The proposed Project once constructed will meet the definition of critical infrastructure in Section 388.113(c)(4) of the Commission’s regulations. National Grid requests that the marked CUI//CEII material maintain that designation for the duration of this proceeding or the life of the facility, whichever is later. A form of protective agreement was filed as Exhibit Z-1 to the certificate application and appears at Accession No. 20160401-5169.

If you have any questions about this submission, please contact me at 781-392-6640.

Respectfully submitted,

/s/ Patrick A. Chaney

Patrick A. Chaney
Lead Project Manager – New England LNG
Capital Delivery, Gas – Complex Project
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cc: Service List

MONTHLY STATUS REPORT FOR FEBRUARY 2021

On October 17, 2018, the Commission issued the Order Issuing Certificate (“Certificate Order”) issuing a certificate of public convenience and necessity to National Grid LNG LLC (“NGLNG”) in Docket No. CP16-121-000 for the Fields Point Liquefaction Project (the “Project”). *National Grid LNG LLC*, 165 FERC ¶ 61,031 (2018). Pursuant to Environmental Condition No. 8 of the Certificate Order, NGLNG provides its monthly status report for the month of February 2021.

Update on Federal Authorizations

As previously reported in the report for December 2018, all required Federal authorizations have been received.

Project Schedule – Construction Status and Work Planned

Work Accomplished in February 2021:

- Training in the Environmental Inspector (“EI”) duties occurred six (6) times this month
- Air monitoring in accordance with the Rhode Island Department of Environmental Management Short-Term Response Action Plan is ongoing and continued during this month.
- Set UOP Pretreatment modules
- Received and Set:
 - Crossover Box
 - LN2 Vaporizer A & B
 - Truck Loading Pump Skid (Staged in Laydown Yard)
- Continued with Pipe Installation: N/S Rack, E/W Rack, Compressor Building, E/W N2 sleeper rack, Pre-Treatment, Metering Skid
- Finished punch-listing available Structural Steel on N/S Rack, E/W Rack, Compressor Building
- Continued installation of Cable Tray along N/S and E/W Pipe Racks
- Continued Pulling Cable
- Completed preassembly of E/W Truss structural steel in the Laydown yard

Work Planned for March 2021:

- Receive and Set:
 - Remaining LN2 Storage equipment
- Continue with Pipe Installation: N/S Rack, E/W Rack, Compressor Building, E/W N2 sleeper rack, Pre-Treatment, Metering Skid
- Complete installation of Cable Tray along N/S and E/W Pipe Racks
- Continue Pulling Cable

Problems Encountered and/or Instances of Non-Compliance and Corrective Actions

The problems encountered, contractor nonconformance/ deficiency logs, and each instance of noncompliance observed by the EI during this reporting period are shown below along with the corrective and remedial actions taken and the effectiveness of the implemented actions.

Problems and Noncompliance				
Date	Problem/Noncompliance	Remedial Action Taken	Date of Corrective Action	Effectiveness of Corrective Action
02/02/2021	Install erosion control blankets on sloped surfaces.	Erosion blankets installed.	02/05/2021	Effective restored erosion controls.
02/02/2021	Place oil filled equipment into secondary containment.	Equipment placed into secondary containment.	02/03/2021	Effective, equipment in secondary containment.
02/16/2021	Crushed stone tracking pad at exit of work zone requires maintenance.	Pads roughened.	02/19/2021	Effective, restored tracking pad.
02/16/2021	Asphalt road surface requires cleaning	Road surface swept.	02/22/2021	Effective, road surface cleaned.
02/16/2021	Secondary containment needs to be adjusted.	Containment adjusted.	02/18/2021	Effective, containment restored.
02/16/2021	Sheens observed in secondary containments.	Absorbent pads used to remove sheen.	02/18/2021	Effective, sheen removed.
02/22/2021	Add crushed stone to eroding area in truck loop.	Crushed stone added.	02/24/2021	Effective, restored erosion controls.
02/22/2021	Readjust filtrex soxx.	Filtrex soxx adjusted.	02/22/2021	Effective restored erosion controls.
02/22/2021	Remove filtress soxx.	Filtrex soxx removed.	02/24/2021	Effective, damaged soxx removed.
02/22/2021	Crushed stone tracking pad at exit of work zone requires maintenance.	Pads roughened.	02/24/2021	Effective, restored tracking pad.

Releases				
Date	Material and Quantity Released	Cause	Description	Corrective Action Taken
02/24/2021	4 ounces of lube oil.	Oil released during equipment inspection.	Oil released to scaffolding and crushed stone.	Oil cleaned from scaffolding with degreaser and rags, impacted crushed stone removed.
02/25/2021	2 ounces cutting oil	Bottle of oil was damaged by manlift.	Wind knocked bottle off of shelf and was stepped on.	Absorbent clay used to clean oil from concrete surface.

Landowner/Resident Complaints

None during this period

Correspondence Received from Other Agencies Concerning Noncompliance

No correspondence was received concerning instances of noncompliance from other federal, state, or local permitting agencies.

Special Inspector's Report

See Attached Register and weekly reports

All site civil work requiring special inspection was, to the best of my knowledge, in conformance with the approved plans and specifications and the applicable workmanship provisions.

<u>Yes</u>	No	See discrepancies noted in the attachments
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Special Inspector:	/s/ Charles Boisvert
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Date:	February 28, 2021
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SPECIAL INSPECTOR'S WEEKLY REPORTS

[SUBMITTED AS A SEPARATE FILE]

**CUI//CEII
CRITICAL ENERGY INFRASTRUCTURE INFORMATION
REMOVED PURSUANT TO 18 C.F.R. §388.113**

ATTACHMENT

NON-CONFORMANCE REGISTERS

National Grid NON-CONFORMANCE REGISTER



Project #: 90000130901

Project Name: Field Point Liquefaction Project Providence, RI

NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-001	Contract section 3.20.6 states the Contractor shall be responsible to store, protect and maintain all equipment.	The equipment as noted above shall be fully inspected by the original equipment manufacturer to what ever extent necessary and then submit to Owner and recommended repairs that should be made	11/15/2019	6/22/2020	Vendor	Procurement
SR010-RPT-001A r1	Incorrect paint applied on vessels at GCAW was not properly addressed by Kiewit with a NCR per Section 18 of the QMS r3	UOP has agreed to blast the non-compliant vessels to achieve a SSPC-SP10 surface profile and repaint following the manufacturer's recommended procedure to apply a #14 system IZ/HS/HS paint system	07/31/19	9-30-2020	Vendor	Procurement
SR010-RPT-002	Section 12.0 of the Kiewit QMS requires all documents that are replaced to be stamped as voided or superseded	Kiewit to follow the Documents Control Procedure 102761-B-DMT-PRO-0001 section 6.3.4 Stamping and Document Notations	11/15/19	6/3/2020	Engineering	Engineering
SR010-RPT-003	National Grid requested Kiewit to provide (2) RT film packages for audit purposes related to the GCAW Adsorber PO. These documents were not provided after several requests spanning a (6) week period	National Grid to perform an audit on all RT film at the Vendor's facility	07/31/19	09/27/19	Procurement	Vendor
SR010-RPT-004	Kiewit did not follow their QMS r3 or contract requirements when changing the location of the load cells for the Micro Pile testing	Kiewit to provide refresher RFI training to field personnel on the RFI process to ensure RFI's are submitted in a timely manner.	09/09/19	09/09/19	Contractor	Construction
SR010-RPT-005	Piping specifications showed the incorrect NFPA-59A specification. The piping specification showed the 2019 version versus the 2001 version.	Kiewit issued a code revision RFI to NG referencing all piping specifications were revised to remove the NFPA 59A 2019 reference	08/27/19	09/27/19	Engineering	Engineering
SR010-RPT-006	Kiewit Project Specific Procurement Plan 102761-B-QLT-PLN-0002 requires any discrepancies or damaged materials will be tagged or labeled accordingly and isolated in the warehouse, laydown area or receiving QA/QC holding areas pending resolution. Underground piping was received at project site without documentation and the piping was not properly stored or marked as quarantined.	Place the referenced piping material into the specified quarantine area and properly mark as do-not-use	10/21/19	10/21/19	Quality	Quality
SR010-RPT-007	Kiewit did not notify National Grid for the off-site testing of the Feed Gas Booster Compressor in accordance with Section 2.23 of the Contract.	Procurement and OSSQ shall review the requirements for notification of off-site testing to ensure National Grid is properly notified in the required time frame.	11/15/19	05/28/20	Procurement	Quality
SR010-RPT-008	Incorrect hydro test pressure and hold time for firewater line. Test was not conducted in accordance with NFPA 24.	The firewater spools in question will be retested in the overall firewater system test to be performed on site at a later date. No further action required	09/27/19	09/27/19	Engineering	Engineering

National Grid NON-CONFORMANCE REGISTER



Project #: 90000130901

Project Name: Field Point Liquefaction Project Providence, RI

NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-009	A Master Inspection Test Plan (MITP) was provided to allow National Grid to determine which vendor inspections/meetings that National Grid wanted written notification to attend. National Grid populated this document with the required Hold/Witness points which included a hold point for "Final Inspection Prior to Shipment (first shipment)" (see attached). This inspection was noted as a hold point by the Client and the Client was not notified of the inspection step.	Revisit the requirements for Client notification of vendor testing with all personnel related to this requirement, document the training and provide National Grid with a responsibility matrix to ensure proper notification is achieved on future inspections.	11/15/19	05/29/20	OSSQ	OSSQ
SR010-RPT-010	Kiewit is required to provide the off-site vendors with the requirements of the contract between National Grid LNG LLC and Kiewit Power Constructors Co. Section 3.10 Welding Requirements was not conveyed to ABB for off-site construction.	Vendor ABB submitted weld procedures as required	08/08/19	09/27/19	Procurement	Procurement
SR010-RPT-011	Section 3.21.23 of the Contract states "the Contractor shall provide a fully functional, integrated, electronic data and document management system". TeamBinder which is the existing Document Control Management system has not proved to be a functional system. This system has shown to be unable to consistently provide access by the Owner to the technical documents for review which are related to this project both for pre-suspension and post suspensions documents. Large data dumps are transmitted without regard to previous review and comments by Owner. Documents have been removed from the obligatory (10) day period prior to period completion. Comments made by the Owner during the document review have not been incorporated into the subsequent document release. The Owner has been subjected to Beta testing of system changes which has proven to be ineffective and confusing to the overall document control procedure.	Provide the Owner with a functional system that is capable and will permanently correct the discrepancies as noted in section "A" above.	01/15/20	01/15/20	Engineering	Engineering
SR010-RPT-012	Section 7.2 Procurement Strategy of the prime Contract requires a Supplier shipment to be inspected by the Contractor to ensure compliance with Project Specifications. The first shipment for the UG piping did not receive a final release shipment	See Addendum "A" attached to the NCR report	05/21/20	05/28/20	OSSQ	Procurement
SR010-RPT-013 R2	Prime Contract Attachment 7 requires APCI to comply with NFPA 59A. A data review of the quality documents noted the actual NDE performed was not in compliance with the NFPA 59A requirements. A review of documentation for the Cross over Bridge piping did not reflect this requirement. Revision 1 added the contract requirements noted in Section 3.10 - SOW	Kiewit will direct APCI to perform the NDE on the crossover box as defined by KIEWIT RFI-000119 resolution dated 2-20-20	04/13/20	05/28/20	Vendor	Vendor
SR010-RPT-014r1	Prime Contract Section 3.10 Scope of Work requires all procedures for welding of piping, vessels and equipment performed off-site shall be submitted to the Owner for review and approval prior to construction.	Kiewit will comply with the requirements of the Prime Contract	09/27/19	11/15/19	Vendor	Vendor

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NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-015 R2	Prime Contract Attachment 7 requires APCI to comply with NFPA 59A. A data review of the quality documents noted the actual NDE performed was not in compliance with the NFPA 59A requirements. A review of documentation for the Cold Box piping did not reflect this requirement. Revision 1 added the contract requirements noted in Section 3.10 - SOW	Evaluate the correct NDE requirements as required by NFPA-59A-2001 and contract. Perform the necessary additional NDE as required to meet compliance for the Cold Box fabrication.	04/13/20	6/22/2020	Vendor	Vendor
SR010-RPT-016	UOP/GCAW equipment data books were reviewed by National Grid and found to be non-compliant with contract requirements	Kiewit shall review the data books for the equipment as mentioned above and perform the necessary tasks so the data books comply with contractual requirements.	05/28/20	11/13/20	Vendor	Procurement
SR010-RPT-017	UOP/GCAW equipment data books were reviewed by National Grid and found to be non-compliant with contract requirements	Kiewit shall review the data books for the equipment as mentioned above and perform the necessary tasks so the data books comply with contractual requirements.	05/28/20	10-6-2020	Vendor	Procurement
SR010-RPT-018	Kiewit Site Specific Procurement Plan requires all contracts with risk level of 4 or 5 to conduct kick-off meetings upon execution of the contact.	Kickoff meetings with all suppliers signed up pre-suspension rated as 4 or 5 on the Master ITP have had kickoff meetings pre-suspension and during project re-initiation. An additional Prefab Quality meeting will be held as indicated in MITP	09/27/19	11/15/19	Procurement	Procurement
SR010-RPT-019	Kiewit Site Specific Procurement Plan requires development of a Master ITP Plan including Witness and Hold Points, FAT Test, quality audits and any additional recommended in-process shop inspection. These activities shall include dates.	Kiewit is to provide an updated and completed Master ITP that complies with the requirement as noted in the Project Specific Procurement Plan 102761-B-QLT-PLN-002	11/15/19	06/04/20	Procurement	OSSQ
SR010-RPT-020	A ground Water monitoring well (mw) was identified in Kiewit's work area for Field Point Liquefaction Project in an area that required placement of several feet of fill. National Grid SIR provided guidance to Kiewit on closure of the mw in accordance with RI DEM requirements, prior to placement of the fill material. Kiewit did not follow proper closure procedures and did not notify On-site environmental for required oversight of mw closure procedure.	Kiewit is to notify National Grid SIR with proposal to locate and properly close the ground water monitoring well in accordance with RIDEM requirements. The mw closure shall be witnessed and approved by the National Grid SIR representatives.	11/15/19	11/15/19	Contractor	Construction
SR010-RPT-021	During the course of the Civil Audit #102519-002 performed at site; Checklist Item 4.0 (c) Has proof rolling been approved by the Geotechnical Engineer in coordination with the Field Representative? The audit team stated that the Geotechnical Engineer was not notified in accordance with Section 4.9 of the Earthwork Specification – 102761-B-CIV-SPC-0001. The audit team was unable to provide documentation supporting the requirement was met.	Proof rolling as described and shown meets the project requirements - M. Oakland Kiewit will be submits a Corrective Action with Preventive actions for procedural adherence - COB 4-3-2020	04/03/20	6/23/2020	Contractor	Construction

National Grid NON-CONFORMANCE REGISTER



Project #: 90000130901

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NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-022	During the course of the Civil Audit #102519-002 performed at site; Checklist Item 3.0 (g) Does the Geogrid meet the requirements as required by Earthwork Specification section 3.12. Documentation showing approval for the Geogrid materials was not provided prior to construction and were subsequently approved by the Geotechnical Engineer on 10/24/2019 which is after the placement of the materials. The audit team was unable to provide documentation supporting approval prior to the start of construction.	Received supporting documentation	01/07/20	01/07/20	Contractor	Construction
SR010-RPT-023	On October 11, 2019 Kiewit and National Grid attended a shop inspection to witness hydro testing of the L9020-A/B N2 storage vessels located at Chart Ind. New Prague, MN. Upon arriving, the (2) vessels of interest were set up to conduct a cold-stretch test in accordance with ASME Section VIII Appendix 44. The subsequent Off-Site Vendor Surveillance report 191011 per OSSQ stated that Chart conducted a Cold Stretch Test in Lieu of a hydro and further referenced ASME Section VIII Div. 1 Appendix 44 as reference. A review of the 2017 version of Mandatory Appendix 44 states in 44-6.1 (f) ...the pressure test required by UG-99 or UG-100 shall be applied after all welding on the pressure retaining parts... Kiewit has not provided National Grid written proof that a hydro test was performed and documented on the vessels in question.	Kiewit to provide National Grid proof that a hydro test was conducted as required by ASME VIII Div.1 or have Chart perform a hydro as required. National Grid will be notified as required to attend the testing of the vessels in question.	11/15/19	7/8/2020	Vendor	OSSQ
SR010-RPT-024	Section 3.10 of the Prime Contract NUMBER 4400005216 requires Kiewit to submit all welding procedures for piping, vessels and equipment performed off-site to Owner (National Grid) prior to start of construction. Kiewit is required to review the welding procedures for project compliance prior to submittal for National Grid review. The welding procedures for IFS's subcontractor, Transend were not submitted to Owner for approval after review by Kiewit.	Attachment 1 includes the approved WPS	05/20/20	5-21-2020	Contractor	OSSQ
SR010-RPT-025	The Contract states in, Section 2.23 Inspection and Testing, that Kiewit is to provide the owner in writing no less than (10) Business days, written notice of scheduled dates for the conduct of, and opportunity to witness, the off-site testing. Kiewit allowed IFS/Transend to conduct a hydrotest of the Feed Gas Filter without providing National Grid proper notification of the test	Kiewit to provide documentation for the notification of Witness Points no less than (10) business days to provide National Grid the opportunity to witness off-site testing, For this specific case Kiewit provided an opportunity to National Grid for review of the hydrotest documentation of the Coalescing Filter Tag# D-0200 on 2/13/2020. Report is attached. The Findings documented in the report have been closed and a copy of the Findings Log is included.	05/20/20	5/26/2020	OSSQ	OSSQ

National Grid NON-CONFORMANCE REGISTER



Project #: 90000130901

Project Name: Field Point Liquefaction Project Providence, RI

NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-026	<p>Regen Gas Heater LDE-1021A tube bundle was removed for cleaning and Eddy Current testing to evaluate the condition of tubes from improper preservation. The testing was performed by IRIS NDT and the test results are attached. Two tubes were found with minor pit like indications showing a measured wall loss. In addition during the inspection several tubes were found to have been bent which caused contact between adjacent tubes causing a non relevant indication with one tube was only partially scanned due to the bent condition.</p>	<p>Rebuild and replace tube bundle performing all required testing as per the contractual requirements.</p>	05/26/20	6/8/2020	Vendor	OSSQ
SR010-RPT-027	<p>Regen Gas Heater LDE-1021B tube bundle was removed for cleaning and Eddy Current testing to evaluate the condition of tubes from improper preservation. The testing was performed by IRIS NDT and the test results are attached. Two tubes were found with indications. Open tube was bent within the first foot and could not be inspected and one tube had non-relevant indication due to tube to tube contact. See attached report</p>	<p>Rebuild and replace tube bundle performing all required testing as per the contractual requirements.</p>	05/26/20	6/8/2020	Vendor	OSSQ
SR010-RPT-028	<p>Kiewit procedure 102761-B-QLT-PRO-0011 Corrective & Preventative Actions states the purpose of said procedure is to establish a continuous improvement process for generating documentation and implementing Corrective and Preventive Actions in accordance with Kiewit's Quality Management System. Section 19.3 of the Kiewit QMS rev 3 states that Corrective or Preventative Action requests can be initiated by the clients or by our employees. National Grid has determined that the number and causes of Non-Compliance Reports (NCR) generated for this project has warranted Corrective Action Reports (CAR's) and has requested on several occasions such reports be generated (see attachment). To date Kiewit has not generated CAR's.</p>	<p>Kiewit will preform CAR's as trends are found . See attached 3 CAR's Kiewit and National Grid had a call between the quality groups and agreed on a path forward.</p>	05/27/20	7/8/2020	Quality	Quality
SR010-RPT-029	<p>Kiewit document 102761-B-QLT-PRO-0009 Project Quality Audit procedure states this procedure is to verify the overall effectiveness of the quality program along with proper implementation. It will also ensure work is conducted in accordance with customer's quality expectations including contract, code, jurisdiction requirements and Cherne Project Quality Management system. This procedure applies to all Cherne's project locations as well as shop and manufacturing facilities. Section 20.0 of the Quality Management System revision 3 defines the requirements of both internal and external audits which are required to be performed. As of this date, National Grid has not received any audit notifications or audit reports as required Kiewit QMS revision 3. National Grid has conducted several audits on Kiewit as of this date.</p>	<p>Kiewit will updated the Quality Audit Schedule. Kiewit and National Grid quality groups meet via a conference call and agreed the attached audits performed by Kiewit meet the audit requirements. Kiewit will invite National Grid to attend future audits.</p>	04/10/20	6/4/2020	Quality	Quality

National Grid NON-CONFORMANCE REGISTER



Project #: 90000130901

Project Name: Field Point Liquefaction Project Providence, RI

NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-030	The Contract, Section 3.10 Welding Requirements, requires all procedures for welding of piping, vessels and equipment performed off-site to be submitted to the Owner for review and approval prior to construction. This requirement is also noted in the Contract between Kiewit and Patterson Horth in Sub-contract SC-7200002536 Compressor Building. Nucor, sub-vendor to Patterson Horth has refused to submit the required welding procedures claiming such procedures as company proprietary information.	Require Patterson Horth/Nucor to formally submit welding procedures and quality deliverables through TeamBinder for National Grid review and approval prior to commencing any welding work.	04/22/20	5/29/2020	Procurement	OSSQ
SR010-RPT-031	<i>Fields Point Project Management of Change</i> Implementation process, dated March 15 th , 2019 define the requirements for Major Changes in Section 3.3 and the requirements for Minor Changes in Section 3.4. Each respective section further provides the steps and processes on how changes are implemented utilizing forms, team reviews, studies and an additional requirement that the MOC is only to be implemented once approval had been received. Kiewit has modified and submitted in large quantity P&ID drawings and classified these drawings as IFC. These drawings depict processes that have been changed, which is in violation of the MOC Implementation Plan. The required MOC documentation and prior approval of the MOC is required as stated in the Implementation Plan.	All Kiewit Project Engineering Staff must attend training on the project MOC procedures which will be conducted by Ryan Terry of PSRG Kiewit agrees to the above disposition 4/1/2020	04/20/20	5/29/2020	Engineering	Engineering
SR010-RPT-032	Kiewit placed backfill on Duct Bank area 7 using (12") lifts. Earthwork Specification 102761-B-CIV-SPC-0001 REV 01 states in Section 4.15 Compaction Requirements that for Trench's the Backfill shall be placed in 6" Lifts.	Kiewit will remove the non-compliant backfill and replace in 6" lifts for the area of Duct Bank 7 and follow the 102761-B-CIV-0001 Earthwork Specification going forward.	04/02/20	7/8/2020	Contractor	Construction
SR010-RPT-033	Kiewit Plain and Reinforced Concrete procedure 102761-B-STR-SPC-0024 rev 1 Section 4.6.2.3 states Form removal shall be in accordance with ACI 301/ACI 301M and the following, which further states certain forms could be removed in (48) hours. ACI 301 Section 2.1.2.1.c requires a submittal of a method for determining concrete strength for formwork removal is in accordance with 2.3.4.2 when a method other than field-cured cylinders is proposed. ACI 347 section 3.7.3.1 states the engineer/architect should specify a minimum strength of the concrete to be attained before removal of forms or shores. Section 3.7.2.3 states because the minimum stripping time is a function of concrete strength, the preferred method of determining stripping time is using tests of job-cured cylinders or concrete in place. An alternative method has not been submitted for approval and forms have been removed before a compressive strength test has been completed and accepted.	Kiewit to submit a plan to National Grid for review and approval that does not require a compressive strength values as a determine factor in form removal or submit a compressive strength value to be met prior to form removal.	6/24/2020	7/8/2020	Engineering	Construction

National Grid NON-CONFORMANCE REGISTER



Project #: 90000130901

Project Name: Field Point Liquefaction Project Providence, RI

NCR Ref:	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause	Discipline
SR010-RPT-034	Kiewit QMS rev 3 section 18.3 States "When a nonconforming situation or procedure is detected, the issues is documented and actions are taken to correct or resolve the issue in a timely manner. National Grid has (4) NCR's generated during 2019 without agreed dispositions; (14) NCR's generated during 2019 that are open without closure.	Kiewit will provide National Grid with an updated status for all open NCR's along with a schedule detailing projected dates for open NCR dispositions and closures. Kiewit will make NCR update party of the weekly client meeting with National Grid in order to keep the team focused on closing out the currently issued NCR's as well as any future NCR's issued on the project.	05/26/20	5/28/2020	Quality	Quality
SR010-RPT-035	National Grid performed an audit on legacy film for the 3886 LD-1000/C Adsorber at the GCAW facility and rejected the Number 4 weld on Nozzle "B" due to chemical stains rendering the film non-compliant with code requirements.	Open pending additional information	05/26/20	7/17/2020	OSSQ	OSSQ
SR010-RPT-036	Section 2.6 Employees and Key Personnel of the Prime Contract requires Key Personnel to be devoted to the Liquefaction Project for all of the time which is necessary to perform the Work and Contractor shall not remove or replace any of the Key Personnel without the prior written approval of Owner, which approval shall not be unreasonably withheld. Kiewit has on multiple occasions removed and replaced Key Personnel on the Project with new personnel without proper notification and/or approval.	Provide owner with current Organizational Chart that provides names to the positions as noted in Appendix "I", and submit resumes on all Key Personnel that have changed within the last (90) days.	05/29/20	5/29/2020	Project Management	Project Management
SR010-RPT-037	The Engineering, Procurement and Construction Contract Number 4400005216 provides requirements for the Contractor to submit documents for Client review and approval. These requirements are addressed in the Scope of Work Section 2.25 and further in Appendix "U". The attached Kiewit TRN # 02088 shows (10) Piping Material Specifications that were revised without providing documents to client for review and/or approval. The attached review history shows an example where Piping Specification 102761-B-MEC-SPC-0083 was issued a Studio Session for revision "A & B" but sessions for revisions "00, 01, 02, & 03" were not issued.	Summarizing the actions from the Document Control Breakout Meeting on March 25, 2020, National Grid will expand the table in Section 4.4 of the Scope of Work and List of Deliverables to expand upon the deliverables National Grid would like to formally review and approve and Kiewit will determine the appropriate methodology to facilitate those reviews. Kiewit will update the Document Control procedure with the mutually agreed table and resolve any outstanding National Grid comments. In the interim, the project will continue the current document review communication process of National Grid/CHIV submitting comments, and Kiewit responding to all comments, even if the comment is not incorporate, and regardless of document type, content of comment, or timing (i.e. when the document was issued).	04/10/20	5/29/2020	Engineering	Engineering

National Grid NON-CONFORMANCE REGISTER



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Project Name: Field Point Liquefaction Project Providence, RI

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SR010-RPT-038	Section 2.25 Design and Engineering Work paragraph (f) of the contract states <i>As Built Drawings and Specifications During construction, Contractor shall keep a relined, marked, up-to-date set of As-Built Drawings and specifications on the Work Site as required under Appendix "U".</i> Kiewit has not maintained a "set" of as-built drawings as required by the statement above for piling and other civil activities..	Kiewit will produce a set of "E" size drawings for all past and future construction activities where as-built conditions have been generated. These drawings will be made available to all National Grid personnel anytime construction activities are taking place on site. The drawings set will be updated immediately upon changes or issuance of the IFC construction drawings that effect or change the original approved design or Scope of Work.	04/03/20	6/3/2020	Engineering	Engineering
SR010-RPT-039	Section 3.3 Engineering Design listed under the Scope of Work states : <i>"Development of up-to-date equipment lists, Drawings, specification0s, and requisition schedules. Frequency to be agreed with Owner as appropriate"</i> . National Grid has made repeated requests for Kiewit to provide an updated Drawing Index on a weekly basis and this has not happened.	Kiewit shall produce an updated drawing index in an acceptable format for all IFC/IFD/IFI drawings and submit such list to National Grid Engineering by COB on each Friday during design and construction of the LNG Facility..	4/6/2020	6/17/2020	Engineering	Engineering
SR010-RPT-040	The contract requires Kiewit to develop within (45) days after Full Notice to Proceed (FNTP) a Project Procedure Manual and as the prime purpose of the PPM is to ensure consistent project processes and procedures. National Grid has requested that Kiewit develop a Site Specific Document Control procedure for over (8) months and as of this date the referenced procedure <i>102761-B-DMT-PRO-001 FPLP Document Control Procedure</i> has not fully addressed the Owner's comments as contractually required.	Kiewit shall immediately produce and implement the Client's comments in the referenced Document Control Procedure and submit as IFC to the project.	6/2/2020	6/2/2020	Project Management	Project Management
SR010-RPT-041	Kiewit performed a closure of the Dry Well next to the Old Propane House without properly notifying National Grid Construction, Environmental and GZA. Procedural steps were provided to Kiewit Construction Manager by National Grid Construction Manager on Friday March 20th, 2020 which outlined the steps and notification requirements for the proposed activity. Kiewit performed the work on Monday March 23rd without notifying the proper personnel as provided by National Grid.	Kiewit to perform a root cause analysis that shall accompany this NCR. The root cause shall be submitted to National Grid for review and approval and a subsequent discussion shall follow. Additionally a Corrective Action shall be generated as this is a recurring event where steps and notification requirements are not followed.	04/01/20	7/8/2020	Project Management	Construction
SR010-RPT-042	Kiewit OSSQ performed a Final Inspection and Document Review on 4-8-2020 at the Highland Tank facility (Report #200408 Highland Tank). There were multiple findings during this visit which included (1) U-1A form requires correction (2) Multiple X-ray reports were found to be non-compliant; missing IQIs, missing "F" markers, missing acceptance noted on report (3) PMI Testing showed low values on nickel composition (4) Missing NDE testing prior to hydro testing (5) Welder Performance Qualification records were found to have various errors. (5) Welding Procedures were found to have typographical errors on the PQR documents.	Kiewit to perform a root cause analysis that shall accompany this NCR. The root cause shall be submitted to National Grid for review and approval and a subsequent discussion shall follow. Additionally a Corrective Action shall be generated as this is a recurring event where documentation review uncovers multiple findings subsequent to a recent OSSQ Inspection. All items as noted in Section "A" are required to be corrected as required to a compliant status with project and code requirements.	5/21/20	7/22/2020	OSSQ	OSSQ

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Project Name: Field Point Liquefaction Project Providence, RI

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SR010-RPT-043	The Contract, Number 4400005216 between National Grid LLC and Kiewit Power Constructors Co. states in section 3.20.6 of the <i>Scope of Work and List of Deliverables</i> the Contractor shall be responsible for providing warehouse and storage facilities both on or off site. Also stated in this section " <i>It shall be the responsibility of the Contractor to store, protect and maintain all equipment and materials in accordance with SOW, the Supplier's preservation requirements and good practice.</i> " The final inspection and FAT testing were conducted on 3-5-2020 and National Grid's request for Preservation and Maintenance and inspection records have not been providing which indicates the P&M for the PDC and installed electrical equipment has not been performed in accordance with the manufacturer's requirements.	The equipment as noted above shall be inspected by either National Grid or a 3rd party inspector, suitable to National Grid to what ever extent necessary and then any repairs, if applicable, shall be corrected to National Grid's satisfaction. Kiewit shall immediately provide a P&M procedure which will include the building and installed electrical gear in accordance with the manufacturer's requirements. The P&M procedure shall provide details of how the preservation requirements will be maintained during shipment and during storage on site.	5/21/2020	5/13/2020	Engineering	Engineering
SR010-RPT-044	The Prime Contract requires Kiewit to provide Client with a copy of any Supply Contract within (10) days after request by Owner. National Grid has requested Kiewit to provide a SDS (Supplier Document Schedule) showing quality deliverables and schedule for the Compressor Building contract. As of this writing, the SDS has not been provided.	Kiewit shall provide National Grid Supplier Document Schedule as requested.	5/21/2020	6/1/2020	Procurement	Procurement
SR010-RPT-045	The Prime Contract, Vendor Contract and Vendor and Subcontractor Document Control and Expediting Procedure provide requirements for Vendors and Subcontractors to provide documentation deliverables per the Seller's Deliverable Schedule. The submittal process shall use the Vendor Data Module of InEight Document (TeamBinder). Additional requirements also state the type of quality deliverables required for submittal. The QA/QC program requirements are passed on to the second-tier suppliers and that the subcontractor enforces them. Nucor, a subcontractor to Patterson Horth has refused to submit the quality deliverables as so required through InEight for Owner review and approval.	Kiewit shall require NUCOR, as a subcontractor to Patterson Horth, to submit all required quality deliverables through the InEight/TeamBinder system for review and approval by Client.	5/20/20	8-13-2020	Procurement	OSSQ
SR010-RPT-046	Section 3.10 of the Contract requires all welding procedures to be submitted to Owner for review and approval prior to construction. The Base plates for the PDC column drawing 102761-00-0000-STR-SF-5806 detail 1 were modified to use a welded embed rod versus the anchor bolt as called out. The fabrication was performed off-site and subsequently installed without Owner approval of welding procedure or welder qualification.	Kiewit shall require the outside fabricator to provide a WPS, PQR and Welder Certifications for Client review. Kiewit shall also provide CMTR's for the base plate and embed rod used in this application. This NCR will prevent the setting of any equipment on the referenced foundation until the NCR is closed.	06/24/20	01/07/21	Procurement	Quality
SR010-RPT-047	Drawing 102761-B-00-0000-STR-SF-5175 detail 8 shows using Mirafi 180N or equal geotextile fabric. The 3rd lift construction used Mirafi 140N instead of the required 180N. This substitution was not approved by Engineering prior to the placement and is considered non-compliant with the specification.	National Grid is requiring a Corrective Action Report be initiated for this specific occurrence and the CAR shall cover the procurement, receiving and installation of the non-compliant product. The CAR must follow the requirements of 102761-B-QLT-PRO-0011 Corrective and Preventive Action procedure.	6/2/2020	8/18/2020	Contractor	Quality

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Project Name: Field Point Liquefaction Project Providence, RI

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SR010-RPT-048	Kiewit procured base plates for the PDC building columns from an outside vendor. The base plates required welding (4) 1" diameter embed rods to the plate in accordance with Kiewit RFI-000161 replacing the previously designed anchor bolts. The welding of the embed rods was performed and installed. A review of the Weld Procedure and Welder Qualification Records provided from the outside vendor showed the welder was qualified for maximum 3/4" thickness in accordance with AWS D1.1 but the overall rod welded was 1" diameter for which was outside the welder's qualified limitations. Kiewit failed to properly review and vet the outside vendor for the work performed.	The base plates as installed are to be removed and properly welded with qualified welders and replaced by a method suitable to National Grid. The repeated failure by Kiewit to follow the contract and/or procedures will require a Corrective Action Report to be generated on this specific instance which will be submitted to NG for review and approval.	7/15/2020	10/15/2020	Contractor	Construction
SR010-RPT-049	Kiewit's Thermal Control plan dated December 5, 2019 provides specifications and tolerances for mass concrete pour temperatures delta between core and near surface . Section "F" of this specification limits the temperature delta between the core and near concrete surface to a maximum of 35° F during the first 4 days. The pour was placed on 5/28/2020 and the attached data log shows for a period of approximately (8) hours between 5/30/2020 @ 5:08 AM until 5/30/2020 @ 12:08 PM the monitored temperature differential was in excess of 35° F (see attached log).	Further testing and observation found the concrete did not exceed the 185 degrees (F) per the Thermal Control Plan Table 6.2.2.2	7/5/2020	7/17/2020	Contractor	Construction
SR010-RPT-050	Hudson Products, subcontractor to Kiewit, submitted their ASME Welding Process Usage Log for National Grid review and the review showed the continuity lacked full traceability to show the welders welded with their qualified process(es) during the previous welding periods as required by ASME Section IX. Hudson is contracted to provide Air Cooled Heat Exchangers and structural steel supports for this product. National Grid will not accept any welders used for the ACHE and/or structural steel fabrication that do not have full traceability of qualifications and welding continuity.	Continuity package to be reviewed prior to hydrotest	7/15/2020	07/15/20	Vendor	OSSQ
SR010-RPT-051	Kiewit provided National Grid with a data package to document current work as performed on the compressor building structural steel. The review identified (5) Welder Performance Qualification Records(WPQR) that were not signed by a qualified person at the time of welder testing rendering these records as non-compliant and the welders non-certified. AWS D1.1 Structural Welding Code - Steel requires qualified personnel to witness visual acceptance of the welds and visual acceptance of the destructive bend test. The welder I.D.'s are as follows: #7, #14, #15, #25, and #91.	All welds that were deposited by the above referenced welders are rejected and must be either cut-out and re-welded or replaced with completely new fabricated members. Other alternative corrective methods may be submitted to Client for their approval.	8/14/2020	8/14/2020	Vendor	OSSQ
SR10-RPT-052	Kiewit Specification 102761-B-MEC-SPC-0007 shows ASTM A182 fittings and flanges are allowed but Note (2) in the Fluid Limitation section states that material sourced from the Peoples Republic of China is not allowed for hazardous systems including but not limited to Fuel Gas, Feed Gas...etc. The Q-Sonic flow meter housing and various components show the material was manufactured in China as shown by the Material Test Reports.	Remove and replace the flow meter with a Q-sonic flow meter with non-Chinese materials per the project specifications.	01/07/21	01/07/21	Vendor	OSSQ

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Project Name: Field Point Liquefaction Project Providence, RI

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SR010-RPT-053	(1) APCI Line List shows line 2402 as a Nitrogen Service with a maximum design pressure of 1100 PSIG. (2) Kiewit's "Pressure Containing Material Sourced from The People's Republic of China Specification" 102761-B-MEC-SPC-007 under the notes section, states " Materials not specifically listed in this table are not allowed to be sourced from the People's Republic of China, unless specifically approved by the Contractor" (3) The Specification only allows P8-Stainless Steel Piping material under (500 psig) design pressure (higher pressures are not included for this material grade.)	Remove and replace the non-compliant material with non-Chinese material or a compliant project specific material which is acceptable	01/08/21	01/08/21	Vendor	OSSQ
SR010-RPT-054	Patterson Horth/Nucor drawings RXB010, RXB020, RXB030, RXB040 AND RXB050 show a vertical gusset weld detail with a (3/16") fillet weld 2-6" staggered on both sides of the gusset. The weld out did not meet this requirement which resulted in a weld-out of 2-12" on each side of the gusset, The attached pictures show the actual weld which is not compliant with the shop drawing weld detail.	Additional welds will be required to meet the shop detail of (3/16") fillet 2-6 staggered weld. Galvanizing is required to be completely removed to bare metal a minimum of 2-3" from the weld area and after acceptance of the final weld the welded area shall be coated with a cold galvanizing component.	10/8/20	10/21/20	Vendor	OSSQ
SR010-RPT-055	Section 4.9 Units and Scale Ratio's of the Contract Scope of Wok states "Weights and measures shall be in the English system and all instruments such as pressure gauges, thermometers, etc., shall be graduated in English units as the primary scale" The ABB Transformer's oil temperature gauge is calibrated in Celsius units.	Replace the non-compliant temperature monitors with the proper scale as per the contract requirements.	10/20/2020	Open	Vendor	OSSQ
SR010-RPT-056	The East West Pipe Rack Structural Steel Erection Sequence document 102761-B-STR-MEM-7101 Rev 1 states in the Exclusion and deviation for erection up to 34 ft TOS EL (bullet item #2) The valve access platform to the south of column line A between column lines 6 & 7 shall not be erected at this stage. This exclusion is based on completion of the 31' level and having the pipe craft install the piping prior to installation of the access platform.	A root cause analysis was performed and a Corrective Action Report detailing the plan to prevent recurrence has been developed. Please see CAR 003 for details of the cause and corrective actions to be implemented to prevent recurrence. The CAR will stay open until the corrective actions prove effective.	01/07/21	01/07/21	Contractor	Construction
SR010-RPT-057	Field construction attempted to install Column A-1 for the Compressor Building and were unable to complete the task because of rebar interference with the column key. The field construction commenced cutting the interfering rebar with a Sawzall before receiving authorization from Engineering to perform this task. See picture below. Changes made to design require Engineering written approval prior to performing work.	Engineering is to evaluate the cut rebar and determine if corrective action is required. Kiewit to perform a Root Cause Analysis to investigate the continuing action of performing work without written authorization and submit to National Grid for review and approval.	10/21/20	10/21/20	Contractor	Construction
SR010-RPT-058	Catch Basin CB107 was installed and found not to comply with project specifications resulting in the outlet opening being (1.8") higher than project requirements. This discrepancy changes the system invert elevation and has a potential impact on the overall storm water system operation. .	Kiewit is to remove and replace CB107 with a compliant catch basin or provide an Engineering corrective action that will meet the project invert elevation requirements on the outlet piping. Any repairs or modifications to the existing catch basin CB107 or related piping will require National Grid's review and approval.	Open	Open	Contractor	Construction

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SR010-RPT-059	Kiewit submitted a red-line drawings (see attached) that will change the original grounding grid design around the E/W Pipe rack. The drawing and changes have not been released by Kiewit Engineering and a RFI supporting the changes has not been submitted to National Grid for review and approval.	Kiewit Engineering shall review the proposed changes and submit a RFI to National Grid for review with proposed red-line drawing showing the necessary changes to be made.	Open	Open	Contractor	Construction
SR010-RPT-060	Prime Contract 4400005216 Scope of Work Section 4.12 Erection Procedure states "The Contractor shall submit copies of the erection procedure for all LNG Facility equipment and systems to the Owner's Representative for information prior to such erection being carried out on the Work Site." National Grid requested a N/S Pipe Rack Erection Sequence and was told Kiewit did not have a final copy for distribution at the time. A period of several days transpired without a submittal of the procedure and Kiewit continued to erect the N/S Pipe rack which is in violation of the Contract as noted above.	Kiewit is to follow the Contract requirements as listed in Section 4.12 and Section 3.21.2 by providing detailed method stated and risk assessments to Nation Grid at least one week in advance of the construction activities. These method statements shall be required for erection of all LNG Facility Equipment and systems as noted in Section 4.12	Open	Open	Contractor	Construction
SR010-RPT-061	Prime Contract 4400005216 Scope of Work Section 4.12 requires the Contractor to submit copies of the erection procedure for all LNG Facility equipment and systems to the owner's representative prior to such erection being carried out on the work site. Additional requirements are addressed in Section 3.21.2 which requires the Contractor to submit detailed method statements and risk assessments to be prepared and made available to the owner for review and comment at least one week in advance of the commencement of the related Work Site construction activities. Kiewit has placed several pieces of equipment on the project without submitting the required erection procedures.	Kiewit is to follow the Contract requirements as listed in Section 4.12 and Section 3.21.2 by providing detailed method stated and risk assessments to Nation Grid at least one week in advance of the construction activities. These method statements shall be required for erection of all LNG Facility Equipment and systems as noted in Section 4.12	Open	Open	Contractor	Construction
SR010-RPT-062	The Atlas Copco Equipment Preservation Plan for the Feed Gas Booster Compressor - L0309 requires in Section 5.3.2 that the equipment must be covered with a tarp or tent to shed to protect the equipment from the elements. There should be no standing water beneath the equipment and the tarp should not have direct contact with the equipment. The Booster Compressor was received on site and proper storage in accordance with the Compressor Preservation Plan was not in place upon receipt and has remained deficient as of this writing.	Follow the complete set of requirements for the storage of the Booster Compressor as noted in the Lay-Up Plan for the L-0309 Compressor. Hold a pre-activity meeting within a week of equipment arrival to cover requirements for the initial inspection, preservation and rigging/setting plan. Built Tent per section 5.3.2 of the ACC preservation requirements. Compressor was set on 10/7/2020; Covered with temp tarp on 10/8/2020; semi permanent scaffold and cover completed on 10/10/2020.	12/03/20	12/07/20	Contractor	Construction

