

# **Distribution Integrity Management Program (DIMP)**

## **Inspection Form**

### **For Operators of Gas Distribution Systems**

### **For Requirements of 192.1005 – 192.1011**

Version 9/23/2011

This inspection form is for the evaluation of a gas distribution integrity management program for all operators of gas distribution except operators of master meter or small liquefied petroleum gas (LPG) systems. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions which are related to specific regulatory requirements are preceded by the rule section number which prescribes the applicable code citation for the question. The cell preceding informational questions states “information only”.

S/Y stands for “Satisfactory” or “Yes”, U/N stands for “Unsatisfactory” or “No”, N/A stands for “Not Applicable”, and N/C stands for “Not Checked”. If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section.

Some inspection questions contain examples to further clarify the intent of the question. For example, question 5 asks, “Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?” The list following “e.g.” is not meant to be all inclusive or that all the items are required. Some of the items may not be applicable to an individual operator’s system.

Some States require the operator to notify and send the State regulatory authority any changes to operator’s plans and procedures. Operators in these states should also notify and send revisions of the DIMP plan to the State regulatory authority.

**Operator Contact and System Information — Operator Information:**

Name of Operator (legal entity):	Puget Sound Energy
PHMSA Operator ID(s) Included in this Inspection:	22189
Type of Operator:	<input type="checkbox"/> Investor Owned <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (e.g. cooperative)
States(s) included in this inspection:	Washington
Headquarters Address:	355 110th Ave. NE Bellevue, WA 98004
Company Contact:	Cheryl McGrath Manager Gas Compliance and Regulatory Audits
Phone Number:	Off: (425) 462-3207 Cell: (206) 604-3221 Fax: (425) 462-3770
Email:	cheryl.mcgrath@pse.com
Date(s) of Inspection:	October 30 – 31, 2012
Date of Report:	November 2, 2012

**Persons Interviewed:**

<b>Persons Interviewed</b> <i>(List the DIMP Administrator as the first contact)</i>	<b>Title</b>	<b>Phone Number</b>	<b>Email</b>
Darryl Hong	Compliance Coordinator	425-462-3911	Darryl.nong@pse.com
Randy Busch	Gas System Integrity	425-462-3965	Randy.busch@pse.com
Stephanie Kreshel	GSI	425-462-3734	<a href="mailto:Stephanie.kreshel@pse.com">Stephanie.kreshel@pse.com</a>
Nancy Wong	GSI	425-417-2377	<a href="mailto:Nancy.wong@pse.com">Nancy.wong@pse.com</a>
Duane Henderson	GSI	425-462-3974	<a href="mailto:Duane.henderson@pse.com">Duane.henderson@pse.com</a>
Cheryl McGrath	Manager Gas Compliance	206-604-3221	<a href="mailto:Cheryl.mcgrath@pse.com">Cheryl.mcgrath@pse.com</a>
Toni Imad	Engineer Gas Compliance	425-456-2970	Antoinette.imad@pse.com

**State or Federal Representatives:**

Inspector Name & Agency	Phone Number	Email
Scott Rukke	360-664-1241	srukke@utc.wa.gov
<b>Inspector Comments (optional):</b>		

192.1005 What must a gas distribution operator do to implement this subpart?						
Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?  <u>OR</u> For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		08/02/2011				
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Fully <input type="checkbox"/>	Partially <input checked="" type="checkbox"/>	Not at all <input type="checkbox"/>		
		Commercial product(s)/templates name if used: <b>FIA plan</b>				
Inspector's Comments						
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		<b>Page 2 of the DIMP plan.</b>				
4	.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline:  <ul style="list-style-type: none"> <li>Design (e.g. type of construction, inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)?</li> <li>Operating Conditions (e.g. pressure, gas quality, etc.)?</li> <li>Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Section 5 Knowledge of the Dist System., Appendix B – Appendix C-1. – 3.2.1				

### 192.1007(a) Knowledge of the System

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
5	.1007(a)(2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Section 5 Leaks back as far as possible. For trending 5 years.				
6	Information Only	Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?				
		Electronic <input checked="" type="checkbox"/>	Paper <input checked="" type="checkbox"/>	SME <input checked="" type="checkbox"/>		
Inspector's Comments		Appendix C Appendix C-2 documents subject matter expert Table B-2 Appendix G – subject matter experts				
7	.1007(a)(3)	Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Section 5, page 5  1. Section Potential Threat Identification and Data Initiatives , page 67, needs to state that they will capture manufacturer.  2. In addition they need to define "Material". Material is more than just "steel" or "plastic." It should include the specification, grade of steel or type of plastic, manufacturer, coating, etc. In accordance with the definition of "pipeline" in §192.3, this includes valves and other appurtenances through which gas flows. PSE agreed to modify this procedure.				
8	.1007(a)(3)	Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Process is section 5, page 5 Page 65 of the continuing surveillance report.				
9	.1007(a)(3)	Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Page 65  Their procedure needs to specify what information is missing and how they will capture missing data. PSE agreed to modify this procedure.				
10	.1007(a)(5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		GOS 2500.1700				

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11	.1007(a)(5)	Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		PSE agreed to add material definition, see above. .				
12	.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Appendix B documents historical knowledge Part of Continuing Surveillance report starts on page 21. PSE is capturing damages not resulting in leaks.				
13	.1007(a)	Has the operator demonstrated an understanding of its system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

### 192.1007(b) Identify Threats

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
14	.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline? <ul style="list-style-type: none"> <li>• Corrosion</li> <li>• Natural Forces</li> <li>• Excavation Damage</li> <li>• Other Outside Force Damage</li> <li>• Material or Welds</li> <li>• Equipment Failure</li> <li>• Incorrect Operation</li> <li>• Other Concerns</li> </ul>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector's Comments		Section 6, they are listed				
15	.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Appendix C subdivides threats.				
17	.1007(b)	In identifying threats did the information considered include any of the following? <ul style="list-style-type: none"> <li>• Incident and leak history      <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> <li>• Corrosion control records      <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> <li>• Continuing surveillance records      <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> <li>• Patrolling records      <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> <li>• Maintenance history      <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> <li>• Excavation damage experience      <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> <li>• Other – Describe: SME's, industry knowledge, <input checked="" type="checkbox"/> yes   <input type="checkbox"/> no</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
18	Information Only	Does the plan categorize primary threats as either "system-wide" or "localized"?				
		All System-wide <input checked="" type="checkbox"/>	All Localized <input type="checkbox"/>	Some of Both <input checked="" type="checkbox"/>	Not Identified <input type="checkbox"/>	
Inspector's Comments		Page C-2 appendix C, either asset specific or system wide.				
19	Information Only	Do the written procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Appendix C Appendix B				
20	.1007(b)	Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector's Comments										
<b>192.1007(c) Evaluate and Rank Risk</b>										
Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C				
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool? Fully <input type="checkbox"/> Partially <input type="checkbox"/> Not at all <input checked="" type="checkbox"/> Commercial tool name if used:								
Inspector's Comments										
22	.1007 (c)	Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method. Risk scores and consequence were rated by SME's using available data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments		Appendix C of the DIMP								
		For questions 23 – 25, do the written procedures to evaluate and rank risk consider:	Corrosion	Natural Forces	Excavation Damage	Other outside Force Damage	Material or Welds	Equipment Failure	Incorrect Operation	Other Concerns
23	.1007 (c)	Each applicable current and potential threat?	S	S	S	S	S	S	S	S
24		The likelihood of failure associated with each threat?	S	S	S	S	S	S	S	S
25		The potential consequence of such a failure?	S	S	S	S	S	S	S	S
		Mark each box above with one of the following: S for "Satisfactory", U for "Unsatisfactory", N/A for "Not Applicable" and N/C for "Not Checked".								
Inspector's Comments		Risk Evaluation and Prioritization Matrix.								
26	.1007 (c)	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach. Subdivided by asset type where similar threats require similar mitigation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments		Risk matrix.								
27	Information Only	Is the method used to evaluate and rank risks reasonable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments		Yes.								
28	.1007(c)	Are the results of the risk ranking supported by the risk evaluation model/method?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments										
29	.1007(c)	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe. Risk model was validated by several	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments		DIMP appendix C PSE agreed to add more detail on the validation process.								



30	.1007(c)	Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

**192.1007 (d) Identify and implement measures to address risks**

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
31	.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Section 8				
32	.1007 (d)	When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Appendix D lists the mitigative measures.				
33	.1007 (d)	Complete the table at the end of this form: <i>Threat Addressed, Measure to Reduce Risk, and Performance Measure</i>				
Inspector's Comments						
34	.1007 (d)	Does the plan include an effective leak management program (unless all leaks are repaired when found)  1. Locate the leaks in the distribution system; <input checked="" type="checkbox"/> 2. Evaluate the actual or potential hazards associated with these leaks; <input checked="" type="checkbox"/> 3. Act appropriately to mitigate these hazards; <input checked="" type="checkbox"/> 4. Keep records; and <input checked="" type="checkbox"/> 5. Self-assess to determine if additional actions are necessary to keep people and property safe. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		DIMP plan page 9				
35	.1007(d)	Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Appendix D lists measures that have been implemented.				

**192.1007(e) Measure performance, monitor results, and evaluate effectiveness**

Question No.	Rule §192	Description					S/Y	U/N	N/A	N/C
	.1007(e)	i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	ii) Number of excavation damages?	iii) Number of excavation tickets received by gas department ?	iv) Total number of leaks either eliminated or repaired categorized by cause?	v) Number of hazardous leaks either eliminated or repaired, categorized by material?	vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?			
36	Does the plan contain written procedures for how the operator established a baseline for each performance measure?	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S		
37	Does the plan establish a baseline for each performance measure?	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S		
38	Does the operator have written procedures to collect the data for each performance measure?	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S		
39	Do the written procedures require the operator to monitor each performance measure?	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S	Choose an item. S		
Mark each box above with one of the following: S for "Satisfactory", U for "Unsatisfactory", N/A for "Not Applicable" and N/C for "Not Checked".										
Inspector's Comments		Page 74 – 76 of the Continuing Surveillance Annual Report.								
40	.1007 (e)	When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Appendix F has an example of older PE pipe Pre 1986 pipe is in the scope.								
41	Information Only	Can the performance measures identified by the operator in the plan be counted, monitored, and supported?					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments										
42	.1007(e)	Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Inspector's Comments	Example is older PE pg 81 of the CSAR report.
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**192.1007(f) Periodic Evaluation and Improvement**

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
43	.1007 (f)	Do the written procedures for periodic review include: a. Frequency of review based on the complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years? b. Verification of general information (e.g. contact information, form names, action schedules, etc.)? c. Incorporate new system information? d. Re-evaluation of threats and risk? e. Review the frequency of the measures to reduce risk? f. Review the effectiveness of the measures to reduce risk? g. Modify the measures to reduce risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)? h. Review performance measures, their effectiveness, and if they are not appropriate, refine/improve them?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector's Comments		The continuing surveillance report is done annually. The data is looked at constantly and the CSAR report comes out annually. Page 8				
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
45	Information Only	Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
46	.1007(f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

### 192.1007(g) Report results

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
47	.1007(g)	Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		DIMP plan page 12, section 11				
48	Information Only	When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
49	.1007(g)	Has the operator submitted the required reports?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Submitted with the Annual Report. Section 11 refers to Procedures manual section 2425.2600 paragraph 5.				

### 192.1009 What must an operator report when mechanical fittings fail?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
50	.1009	Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		2425.1100				

### 192.1011 What records must an operator keep?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
51	.1011	Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		DIMP Plan section 12				
52	.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		DIMP Plan section 12				
53	.1011	Has the operator maintained the required records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Inspector's Comments	DIMP Plan section 12
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**Table 1: Threat Addressed, Measure to Reduce Risk, and Performance Measure**

For the top five highest ranked risks from the operator’s risk ranking list the following:

- Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);
- Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);
- Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);
- Associated performance measure.

	Primary Threat Category	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1	Excavation Damage	Failure to call	3rd party Damage Prevention Program, A/A’s in development	Number of excavation Damages, Number of Locate Requests, and Number of Excavation damages/1000 Locate Requests
2	Excavation damage	Improper Excavation	3rd party Damage Prevention Program, A/A’s in development	Number of excavation Damages, Number of Locate Requests, and Number of Excavation damages/1000 Locate Requests
3	Materials and Welds	Brittle Cracking, Older vintage PE	Older Vintage PE Pipe Mitigation Program	Number of brittle-like cracking and fusion failures on Older Vintage PE
4	Materials and Welds	Fusion failure, Older Vintage PE	Older Vintage PE Pipe Mitigation Program	Number of brittle-like cracking and fusion failures on Older Vintage PE
5	Incorrect Operation	Sewer Cross Bore	Sewer Cross Bore Program in Development	In Development

Other Inspector Comments	
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